



Holmer Green Senior School

Safeguarding Policy
(Including Child Protection
allegations against staff and low-level
concerns)

September 2026

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Emily Reed	reede@holmer.org.uk 01494 712219
Deputy Designated Safeguarding Lead (DDSL)	Laura Foster	fosterl@holmer.org.uk 01494 712219
Assistant Designated Safeguarding Lead	John Smith	SmithJ@holmer.org.uk 01494 712219
Local authority designated officer (LADO)	LADO	secure-LADO@buckinghamshire.gov.uk 01296 382070
Safeguarding Governor		
Channel helpline		020 7340 7264 counter.extremism@education.gsi.gov.uk
First Response		01296 383962

1. Aims

The school aims to ensure that:

- Appropriate action is taken **promptly and proportionately** to safeguard and promote children's welfare
- All staff understand their **statutory responsibilities** under *Keeping Children Safe in Education (KCSIE) 2026*
- Staff receive regular, relevant and up-to-date training, including online safety, filtering and monitoring, emerging risks (e.g., misogyny, incel-linked content, financial exploitation), and recognising and reporting safeguarding concerns
- Safeguarding is embedded within the school's whole-school approach, including curriculum, behaviour, attendance, SEND, mental health and online safety

2. 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 \(2023\)](#), and the [Governance Handbook](#). 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:
- 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](#), 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 protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). Governors and leaders must consider how pupils with these characteristics are supported and protected.
- [The Public Sector Equality Duty \(PSED\)](#), which requires schools to have due regard to eliminating unlawful discrimination, harassment and victimisation. This includes recognising that some pupils may be disproportionately at risk of harm (e.g., sexual violence, homophobic, biphobic or transphobic bullying, racial discrimination).
- 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 be trained in safer recruitment techniques
- [Crime and Policing Act 2026](#), which removes the supervision exemption and updates definitions of regulated activity
- Requirements relating to [Check a Teacher's Record](#), which replaces the former TRA Employer Access service.

This policy also complies with our funding agreement and articles of association.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support as soon as problems emerge, including through Early Help and Family Help
- Protecting children from maltreatment, whether within or outside the home, including online harm, exploitation, and exposure to harmful content
- Preventing impairment of children's mental and physical health or development, including recognising mental health as a safeguarding concern
- Ensuring children grow up in circumstances consistent with safe and effective care, including recognising risks such as neglect, domestic abuse, financial exploitation, and modern slavery
- Taking action to enable all children to have the best outcomes, including supporting attendance, behaviour, relationships, identity, and long-term wellbeing

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm, or including where they see, hear or experience its effects in domestic abuse. Appendix 1 explains the different types of abuse, including physical, emotional, sexual, neglect, and emerging forms such as online-facilitated abuse, financial exploitation, and child-on-parent abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail. Appendix 1 defines neglect in more detail, including supervisory neglect, medical neglect, and educational neglect.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This includes images created or shared via mobile phones, social media, or live-streaming platforms.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (2026) and defined in the Children Act 2004, (as amended by the Children and Social Work Act 2017). They work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- Buckinghamshire Council
- Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
- The chief officer of police for Thames Valley Police

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or wishes to be described that way. When managing an incident, we will use the term the child feels most comfortable with.

Perpetrator / alleged perpetrator

These terms are widely used and recognised. However, we will consider carefully what terminology we use (especially in front of children), as abusive behaviour can also be harmful to the child displaying it. We will decide what is appropriate on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, neglect, or exploitation, both online and offline, and additional barriers can exist for some children in recognising, disclosing, or reporting concerns. 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, and we take positive action where needed to reduce disadvantage and risk.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions including those with communication needs or sensory impairments
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identity, sexuality or intersectional vulnerabilities
- Have English as an additional language
- Are living in difficult circumstances, such as temporary accommodation, poverty, substance misuse in the home, domestic abuse, or homelessness
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers, refugees, or newly arrived in the UK
- Are at risk due to either their own or a family member's mental health needs, including where mental health impacts attendance, relationships, or safety
- Are looked after or previously looked after
- Are frequently missing or absent from education, home, or care, including patterns of reduced attendance that may indicate safeguarding risk
- Have a parent/carer who has expressed an intention to home educate, particularly where this may remove the child from safeguarding oversight
- Have experienced multiple suspensions, are at risk of permanent exclusion, or are attending alternative provision or a pupil referral unit

- Has a parent or carer in custody, or is affected by parental offending
- Are LGBT or gender-questioning, recognising additional barriers to disclosure and increased risk of targeted harassment or violence
- Are at risk of misogyny, incel-linked content, or online extremist ideologies, which KCSIE 2026 identifies as emerging safeguarding concerns
- Are experiencing financial exploitation, modern slavery, or child-on-parent abuse

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, governors, and any adults working with pupils on or off the school site. It is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school provision, alternative provision, work experience and off-site activities.

The school plays a crucial role in preventative education as part of a strengthened whole-school approach to safeguarding, preparing pupils for life in modern Britain. This includes a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia, sexual violence, sexual harassment, and all forms of discriminatory or harmful behaviour.

Preventative education is underpinned by our:

- Behaviour Policy, which promotes respectful relationships, safety, and inclusion
- Pastoral Support System, which identifies emerging needs early and provides targeted support
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries, consent and personal autonomy
 - Stereotyping, prejudice, equality, and the impact of discriminatory attitudes
 - Body confidence, self-esteem, and digital resilience
 - How to recognise abusive or harmful relationship including coercive and controlling behaviour
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, sexual violence domestic abuse, honour-based abuse such as forced marriage and FGM, online harms, including harmful sexual content, misogynistic/incel-linked content, and extremist ideologies
 - How to access help, support, and reporting routes inside and outside school
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable, how to report concerns safely

5.1 All staff

All staff will:

- Read and understand part 1 of [Keeping Children Safe in Education](#) 2026
- Review this guidance at least annually and sign a declaration at the start of each academic year confirming they have read and understood it
- Reinforce the importance of online safety when communicating with parents and carers, including making them aware of what pupils are asked to do online (e.g., websites, platforms, digital tools, or online interactions).
- Provide a safe space for pupils who are LGBTQ+ or gender-questioning to speak out and share concerns and access help

All staff will be aware of:

- The school's safeguarding systems, including:
- this child protection and safeguarding policy

- the staff code of conduct
- the behaviour policy
- the online safety policy, including expectations, roles and responsibilities relating to filtering and monitoring
- the identity and role of the designated safeguarding lead (DSL) and deputy DSL
- the safeguarding response to children who are absent or missing from education

Early Help and Family Help, including:

- their role in identifying emerging needs
- liaising with the DSL
- sharing information with other professionals
- understanding that Early Help aims to support children of all ages, improve family resilience, and reduce the chance of problems escalating
- The process for making referrals to local authority children's social care, including statutory assessments that may follow a referral, and the role staff may be expected to play.
- What to do if they identify a safeguarding concern or a child discloses abuse, exploitation, or neglect, including:
 - maintaining appropriate confidentiality
 - reporting concerns immediately to the DSL
 - understanding specific issues such as FGM, forced marriage, domestic abuse, and online-facilitated harm
- The signs of different types of abuse, exploitation and neglect, including:
 - child-on-child abuse
 - child sexual exploitation (CSE)
 - child criminal exploitation (CCE)
 - indicators of serious violence, including county lines
 - radicalisation and extremist ideologies
 - misogyny and incel-linked content
 - online harms, including harmful sexual content, disinformation, conspiracy content, and digital coercion (sextortion, blackmail, pressure to share images)
 - AI-generated harmful content (deepfakes, sexualised content, grooming)
 - Financial exploitation (crypto scams, money-muling, online fraud)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school, in the community and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi, trans or gender questioning may be targeted by other children and may face additional barriers to disclosure.
- What to look for to identify children who need help or protection, including changes in behaviour, attendance, presentation, relationships, or online activity.

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to fulfil these responsibilities.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding, including:

- online safety
- understanding and overseeing the school's filtering and monitoring systems
- ensuring safeguarding is embedded across behaviour, attendance, SEND, mental health and curriculum

Availability

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

The DSL and DDSL can also be contacted out of school hours if necessary, via email at : sreed@holmer.org.uk or fosterl@holmer.org.uk.

When the DSL is absent, the deputy –Laura Foster, Deputy Headteacher – will act as cover.

If the DSL and deputy are not available, Ed Hillyard, Headteacher will act as cover (for example, during out-of-hours/out-of-term activities).

Time, training and resources

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Maintain a strong understanding of harmful sexual behaviour, including online-facilitated sexual harm
- Maintain a strong understanding of the school's filtering and monitoring systems, including reviewing reports, identifying patterns of concern, and ensuring appropriate responses

The DSL will also:

- Keep the headteacher informed of safeguarding issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to ensure school policies reflect current practice
- Be confident in knowing what local specialist support is available for all children involved in incidents (including victims and alleged perpetrators), and how to access this support
- Ensure children have an 'appropriate adult' during police investigations or searches
 - Keep written records of all concerns, discussions, decisions and rationales, including cases where referrals were or were not made to external agencies such as children's social care or Prevent
 - Oversee the school's safeguarding response to children who are absent or missing from education, recognising absence as a safeguarding indicator
 - Ensure safeguarding is embedded in online safety, including reviewing filtering and monitoring annually and reporting findings to governors
 - Ensure safeguarding is embedded in attendance, behaviour, mental health, SEND and pastoral systems
 - Ensure staff understand emerging risks such as misogyny, incel-linked content, financial exploitation, modern slavery, and child-on-parent abuse

The full responsibilities of the DSL and deputy are set out in their job description.

5.3 The governing board

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of policy development, decision-making, and school culture.
- Evaluate and approve this policy at each review, ensuring it complies with statutory requirements and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board-level lead or link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This person will always be different from the DSL.
- Ensure all staff undergo safeguarding and child protection training, including online safety, filtering and monitoring, emerging risks (such as misogyny/incel-linked content, financial exploitation, and modern slavery), and that such training is updated in line with advice from the safeguarding partners.
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Ensuring leaders and staff understand the provisions in place and their roles and responsibilities relating to filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and working with IT staff and service providers to ensure the school meets these standards

The governing board will also ensure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and oversight of filtering and monitoring systems and processes.
- The school has procedures to manage any safeguarding concerns or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- This policy reflects that children with SEND or medical/physical health conditions may face additional barriers to abuse, exploitation or neglect being recognised.

Safeguarding responsibilities when another body uses the school premises or provides activities

Where another body is providing services or activities (whether or not the children attending are on the school roll), the governing board will:

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Ensure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Ensure safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

Allegations involving the headteacher

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher (see appendix 3).

Training and compliance

All governors will read Keeping Children Safe in Education (2026) in its entirety.

Section 15 of this policy outlines how governors are supported to fulfil their role.

5.4 The headteacher

The headteacher is responsible for the implementation of this policy, including ensuring that staff (including temporary staff) and volunteers:

- Are informed of the school's safeguarding systems as part of their induction, including this policy, the behaviour policy, the staff code of conduct, the online safety policy, and the identity and role of the DSL and deputy DSL
- Understand and follow the procedures included in this policy, particularly those relating to referrals of suspected abuse, exploitation, neglect, or emerging safeguarding concerns. Communicating this policy to parents/carers when their child joins the school and via the school website
- Communicating this policy to parents/carers when their child joins the school and ensuring it is available via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, while collaborating with the DSL where appropriate to ensure concerns are recorded, reviewed and responded to in line with school procedures.
- Ensuring that safeguarding is embedded across the school's whole-school approach, including behaviour, attendance, SEND, mental health, online safety, and curriculum.
- Ensuring that staff receive regular safeguarding training, including online safety, filtering and monitoring, and emerging risks such as misogyny/incel-linked content, financial exploitation, modern slavery, and child-on-parent abuse.
- Ensuring that the school's filtering and monitoring systems meet DfE standards and that staff understand their roles and responsibilities in relation to online safety.

6. Confidentiality

The DfE's Information Sharing Guidance (2018) and the Data Protection Act 2018 set out the principles for sharing information to safeguard children. The UK GDPR, Data Protection Act 2018 and human rights law are not barriers to justified information sharing; they provide a framework to ensure personal information is shared appropriately.

All staff must understand that:

- The DfE's data protection guidance should be used to help comply with data protection law; develop data policies and processes; determine what staff and pupil data must be kept; and follow good practices for preventing personal data breaches
- 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 and UK GDPR do not prevent, or limit, the sharing of information for safeguarding purposes
- When sharing special category personal data, the Data Protection Act 2018 includes a specific condition for "safeguarding of children and individuals at risk", allowing practitioners to share information without consent when:
 - it is not possible to gain consent
 - it cannot reasonably be expected that consent is gained
 - gaining consent would place a child at risk
- Staff must never promise confidentiality to a child who reports abuse, exploitation or neglect.

Requests not to share information (sexual violence or sexual harassment)

If a victim asks the school not to share information about sexual violence or sexual harassment:

- There is no definitive even without consent, staff may lawfully share information if another UK GDPR legal basis applies.

- The DSL must balance the victim's wishes with 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. Reports of these must be referred to the police.
 - If the alleged perpetrator is under 10, the starting principle of referring to the police still applies.

Anonymity and criminal processes

- All staff will:
- Be aware of anonymity, witness support and the criminal process where a report of sexual violence or sexual harassment progresses through the justice system.
- Do all they reasonably can to protect the anonymity of children involved, including limiting who is informed and managing support sensitively.
- Consider the potential impact of social media, including the risk of rumours or exposure of identities.

Seven Golden Rules of Information Sharing

- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' These support staff in making decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below whenever a safeguarding concern arises.

In this and subsequent sections, any reference to the DSL should be understood to mean "the DSL or deputy DSL".

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

Make a referral to 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.**

If you make a referral directly, inform the DSL as soon as possible.

Safeguarding partners (Children Act 2004, as amended by the Children and Social Work Act 2017) are:

- The local authority
- The Integrated Care Board
- The Chief Officer of Police

Online referral link:

<https://www.gov.uk/report-child-abuse-to-local-council>

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely

- 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 cannot promise confidentiality.
- 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.
- If appropriate, make a referral directly to children's social care and/or the police and inform the DSL as soon as possible.

Be aware that some children may:

- Not feel ready, or know how to tell someone
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened.
- Face additional barriers due to vulnerability, disability, sexual orientation, gender identity, or language barriers

These factors must never prevent staff from exercising professional curiosity and speaking to the DSL.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

FGM is illegal and a form of child abuse with long-lasting consequences.

Possible indicators and risk factors are listed in Appendix 4.

Mandatory reporting duty

Any teacher who

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs that appear to show FGM has been carried out

Must report this to the police personally and immediately.

This is a statutory duty. Failure to comply may result in disciplinary action.

Teachers should also inform the DSL (unless specifically instructed not to disclose) and involve children's social care as appropriate.

This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 :

- Must speak to the DSL
- Follow local safeguarding procedures.

Staff must not examine pupils.

If a pupil is at risk of FGM (but FGM is not known to have been carried out), staff must speak to the DSL and follow safeguarding procedures.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Where possible, speak to the DSL first to agree a course of action.

If the DSL is not available, do not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also contact the NSPCC helpline on 0800 800 5000. Share details of any actions you take with the DSL as soon as possible.

Early help/Family Help

- The DSL will usually lead on liaising with other agencies and coordinating an inter-agency assessment.
- Staff may be required to support other professionals and may act as the lead practitioner in some cases.
- The school will work with safeguarding partners to agree thresholds for different types of assessment.
- The DSL will keep the case under review and consider referral to children's social care if concerns do not improve.
- Timelines of interventions will be monitored and reviewed.

Referrals

If referral to children's social care or the police is appropriate, the DSL will make the referral or support staff to do so.

If you make a referral directly, inform the DSL as soon as possible.

Children's social care will decide within 1 working day what action to take and inform the referrer. If this does not happen, the DSL or referrer must follow up and ensure outcomes are recorded.

If the child's situation does not improve, the DSL or referrer must follow local escalation procedures.

7.5 If you have concerns about extremism

If the child is not in immediate danger:

- Speak to the DSL first, where possible.
- If the DSL is unavailable, speak to a senior leader or children's social care.
- Make a referral directly if appropriate and inform the DSL as soon as possible.

The DSL will assess risk and decide whether to refer to:

- Channel (support for individuals at risk of radicalisation)
- Children's social care
- Other relevant agencies

DfE extremism helpline: 020 7340 7264

Email: counter_extremism@education.gov.uk

In an emergency, call 999 or the anti-terrorist hotline 0800 789 321 if:

- Someone is in immediate danger
- Someone may be planning to travel to join an extremist group
- You see or hear something terrorist-related

7.6 If you have a concern about mental health

Mental health problems can be indicators of abuse, neglect or exploitation.

Staff must be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If the mental health concern is also a safeguarding concern, follow Section 7.4 immediately.

If the concern is not a safeguarding concern, speak to the DSL to agree a course of action.

Refer to DfE guidance on [mental health and behaviour in schools](#) for more information

7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made that they pose a risk of harm to children, you must report this to the headteacher as soon as possible.

If the concern or allegation relates to the headteacher, report it to the chair of governors.

The headteacher or chair of governors will follow the procedures set out in Appendix 3.

All schools:

If you believe there is a conflict of interest in reporting a concern or allegation to the headteacher, you must report it directly to the Local Authority Designated Officer (LADO).

If an allegation relates to an incident involving an individual or organisation using the school premises to run an activity for children, staff must follow the school's safeguarding procedures and inform the LADO, as they would for any safeguarding allegation.

7.8 Allegations of abuse made against other pupils

We recognise that children can abuse other children. Abuse will never be tolerated or dismissed as "banter", "just having a laugh", or "part of growing up". Such attitudes create unsafe environments and undermine a culture of safeguarding.

We recognise the gendered nature of child-on-child abuse, while also acknowledging that all child-on-child abuse is unacceptable and will be taken seriously

Most incidents of pupils hurting other pupils will be dealt with under the behaviour policy, but this safeguarding policy applies where the behaviour raises safeguarding concerns, including where the alleged behaviour:

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

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

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

- You must record the allegation and inform the DSL
- Do not investigate the allegation yourself
- The DSL will contact children's social care and follow their advice, and contact the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan in place for all children involved (victims, alleged perpetrators, and any others affected).
- This will include consideration of school transport, which may be a vulnerable environment.
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police and other agencies as required while ensuring children are protected and any disciplinary measures are considered.

The school will ask the police for clarification where needed.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We take proactive action to minimise the risk of child-on-child abuse and create an environment where pupils feel confident reporting concerns.

We will:

- Challenge all derogatory, sexualised or inappropriate language or behaviour between peers, including requests for or sending sexual images.
- Be vigilant to gender-specific issues, such as:
 - sexualised or aggressive touching or grabbing towards female pupils
 - initiation or hazing-type violence affecting boys
- Ensure the curriculum teaches pupils about appropriate behaviour, consent, respect and digital safety.
- Ensure pupils can easily and confidently report abuse using the school's reporting systems (see Section 7.10).
- Ensure staff reassure victims that they are being taken seriously
 - Be alert to reports of sexual violence or harassment that may indicate environmental or systemic issues requiring policy, process or curriculum changes.
 - Support children who have witnessed sexual violence, especially rape or assault by penetration, and ensure victims, alleged perpetrators and witnesses are not bullied or harassed.
 - Consider intra-familial harms, including support for siblings following a report of sexual violence or harassment.

Staff Training and Awareness

Staff will be trained to understand:

- How to recognise indicators and signs of child-on-child abuse and respond appropriately.
- That even without reports, child-on-child abuse may still be happening — staff must maintain an attitude of “it could happen here”.
- That victims may not always make a direct report. For example:
 - A child may show signs or act in ways they hope adults will notice.
 - A friend may make a report.
 - A staff member may overhear something.
 - A child's behaviour may indicate something is wrong.
- That some children face additional barriers to disclosure due to vulnerability, disability, gender, ethnicity, sexual orientation or language.
- That a pupil harming a peer may be a sign that the child is being abused or exploited themselves.
- Their role in preventing child-on-child abuse and responding promptly to concerns.
- That any concerns about child-on-child abuse must be reported to the DSL immediately.
- That social media may play a role in the fallout from incidents, including contact between victims, alleged perpetrators and peers.

Disciplinary Action

The DSL will lead on any disciplinary action for alleged perpetrators. Support will be provided at the same time as disciplinary measures.

Disciplinary action can be taken while other investigations are ongoing (e.g., police investigations).

The school may reach its own conclusion and impose a penalty unless:

- Doing so would prejudice an investigation or prosecution — the DSL will liaise with police/children's social care.
- Circumstances make it unreasonable or irrational to reach a conclusion while an independent investigation is ongoing.

7.9 Sharing of nudes and semi-nudes ('sexting')

This section follows the [UK Council for Internet Safety \(UKCIS\)](#) guidance and KCSIE 2026 requirements.

Your responsibilities when responding to an incident

If you become 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'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery or ask a pupil to share or download it (if you accidentally view the imagery report this to the DSL immediately)
- Delete the imagery or ask the pupil to delete it
- Ask the pupils involved to disclose information regarding the imagery -this is the DSL's responsibility
- Share information about the incident with other staff, pupils, or parents/carers.
- Blame or shame any young person involved.

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

Initial review meeting

After a report, the DSL will hold an initial review meeting with appropriate staff. This may include the reporting staff member and safeguarding/leadership team members.

The meeting will consider:

- Whether there is an immediate risk to any pupil
- Whether a referral to police and/or children's social care is required
- Whether viewing the imagery is necessary to safeguard the young person
- (In most cases, images should not be viewed.)
- What further information is needed
- Whether the imagery has been shared widely and via which platforms
- Whether immediate action is needed to remove imagery from devices or online services
- Relevant facts about the pupils involved
- Whether another school, college or setting needs to be contacted
- Whether parents/carers should be informed
- (In most cases, they should be.)

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 SEN)
- The imagery suggests sexual acts that are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil is under 13

- The DSL believes a pupil is at immediate risk of harm, including suicidal or self-harming behaviour linked to the incident

If none of these apply, the DSL (in consultation with the headteacher and relevant staff) may decide to respond without involving police or children's social care.

All decisions will be recorded.

Further review by the DSL

If no referral is made at the initial stage, the DSL will conduct a further review to establish facts and assess risk.

This may include interviews with pupils involved.

If at any point there is concern that a pupil has been harmed or is at risk of harm, a referral will be made immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage unless doing so would place the pupil at greater risk.

Referring to the police

If referral to the police is necessary:

- For immediate danger: call 999
- To log an incident: call 101 or report online

Recording incidents

All incidents involving the sharing of nudes and semi-nudes, and all decisions made, will be recorded.

Record-keeping arrangements in Section 14 apply.

Curriculum coverage

Pupils are taught about the risks and consequences of sharing nudes and semi-nudes through PSHCE. Teaching includes:

- What sharing nudes and semi-nudes is
- How it is most likely to be encountered
- Consequences of requesting, forwarding or providing such images
- Including when it is abusive or constitutes online sexual harassment
- Legal implications
- Emotional and reputational harm
- Pupils also learn strategies to manage:
 - Pressure or requests to provide or forward images
 - Receiving such images

This policy is shared with pupils so they understand the school's response to incidents.

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, the school will take the child's wishes and feelings into account when determining what action to take and what support to provide.

We recognise the importance of ensuring pupils feel safe, listened to and comfortable when reporting concerns or allegations. To achieve this, we will:

- Put systems in place for pupils to confidently report abuse through a member of the pastoral team or any trusted adult
- Ensure reporting systems are well-promoted, easily understood and accessible, including through PSHCE lessons
- Make clear to pupils that their concerns will be taken seriously and that they can safely express their views and give feedback

Online safety and the use of mobile technology

We recognise the importance of safeguarding children from harmful and inappropriate online material, and understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust filtering and monitoring systems in place to ensure online safety for pupils, staff, volunteers and governors
- Protect and educate the whole school community in the safe and responsible use of technology, including mobile and smart technology
- Set clear guidelines for the use of mobile phones across the school community
- Establish clear mechanisms to identify, intervene in and escalate online safety incidents or concerns

The 4 key categories of risk

Our approach to online safety addresses the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our curriculum, including:
 - Safe use of social media, the internet and technology
 - Keeping personal information private
 - Recognising unacceptable behaviour online
 - Reporting cyber-bullying, including when they are a witness rather than a victim
- Train staff, as part of their induction, on:
 - Safe internet use
 - Online safeguarding issues including cyber-bullying and online radicalisation
 - Expectations, roles and responsibilities around filtering and monitoring.
- Educate parents/carers about online safety via the school website, direct communications and parents' evenings, including how to raise concerns
- Ensure staff understand restrictions on mobile phone and camera use, including:
 - Personal phones may be brought to school but used only during non-contact time
 - Staff must not take photos or recordings of pupils on personal devices
- Ensure all pupils, parents/carers, staff, volunteers and governors sign an acceptable use agreement covering internet use, ICT systems and mobile/smart technology
- Explain sanctions for breaches of acceptable use policies
- Ensure all stakeholders understand that staff have the power to search pupils' phones, in line with DfE guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit exposure to the four categories of risk (see ICT Acceptable Use Policy)

- Carry out an annual review of online safety, supported by an annual risk assessment reflecting the risks faced by our school community
- Provide regular safeguarding updates, including online safety, to all staff at least annually
- Review the child protection and safeguarding policy annually, ensuring online safety procedures are updated regularly

This section summarises our approach. Full details are available in our [ICT Acceptable Use Policy](#); [Information IT and Cyber Security Policy](#); [Mobile Phone Policy](#)

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Holmer Green Senior School recognises that AI can enhance teaching, learning and safeguarding. However, AI may also facilitate abuse (e.g., bullying, grooming, harassment) or expose pupils to harmful content. For example:

- Deepfakes – AI-generated images, audio or video hoaxes that appear real
- AI-generated sexual content
- AI-generated extremist or misogynistic content
- AI-generated financial scams

The school will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying/behaviour policy.

Staff must be aware of the risks of using AI tools while they are still developing and must carry out risk assessments for any new AI tool used by the school.

9. Notifying parents or carers

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

Other staff will only speak to parents/carers after consultation with the DSL.

If notifying parents/carers would increase the risk to the child, the DSL will consult children's social care before doing so.

Allegations involving other children

In cases of child-on-child abuse, we will normally notify the parents/carers of all children involved.

We will carefully consider what information to share, and when, and will work with the police and/or children's social care to ensure information sharing is consistent and safe.

The DSL will, with relevant agencies (as appropriate):

- Meet with the victim's parents/carers (with the victim present if appropriate) to explain safeguarding measures and understand their wishes regarding support and progression of the report
- Meet with the alleged perpetrator's parents/carers to discuss support, safeguarding measures (e.g., class changes), and the rationale for decisions

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

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges, and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse 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 disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in reporting concerns
- Increased vulnerability to online harms, including digital coercion, grooming, and exposure to harmful content
- Increased vulnerability to misogyny, incel-linked content, extremist content, and other emerging online risks identified in KCSIE 2026

Any safeguarding concern involving a pupil with SEND will require close liaison between the DSL and the SENCO, ensuring:

- A holistic understanding of the child's needs
- Appropriate adjustments to communication and reporting processes
- Tailored support and risk assessment
- Consideration of whether the child requires Early Help or Family Help

11. Pupils with a social worker

Pupils may have a social worker due to safeguarding or welfare needs. We recognise that experiences of adversity and trauma can leave children vulnerable to further harm and may create barriers to:

- Attendance
- Learning
- Behaviour
- Mental health
- Relationships

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, persistent absence or unexplained absence, recognising absence as a safeguarding indicator
- Providing pastoral, mental health and academic support
- Coordinating Early Help or Family Help
- Multi-agency working and information sharing

Staff will maintain **professional curiosity**, recognising that pupils with a social worker may not always disclose concerns directly.

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
- Staff understand the additional barriers looked-after children may face, including trauma, attachment needs, disrupted education, and increased vulnerability to exploitation and online harm

We have appointed a designated teacher, Deputy Headteacher, Alan Wooller, 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 (PEPs)
- Ensure staff understand the impact of trauma and attachment on behaviour, attendance, learning and relationships
- Support transitions, ensuring information is shared appropriately and safeguarding risks are managed

13. Children and the Court system

A growing number of children may be required to give evidence as witnesses in crown, magistrates' or youth courts. This experience can have a significant impact on their:

- Family relationships
- Education and attendance
- Behaviour and emotional regulation
- Mental health and wellbeing

We recognise that children who act as witnesses may experience:

- Feelings of guilt or responsibility
- Anxiety about the court process
- Fear of repercussions or social stigma
- Disruption to routines and learning
- Increased vulnerability to exploitation or peer pressure

Our pastoral team has experience supporting children involved in court processes and will work closely with the DSL to ensure:

- Trauma-informed support
- Adjustments to attendance, timetable or pastoral provision
- Liaison with social workers, youth offending teams or legal representatives
- Consideration of Early Help or Family Help
- Monitoring of wellbeing, behaviour and online activity (including risks such as social media rumours or harassment)

Guidance for children aged 12–17 about being a witness is available here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/708093/ywp-12-17-eng.pdf

Children with family members in prison

An increasing number of children have family members in prison. This can be a traumatic experience and may leave children with:

- Vulnerable or unstable care arrangements
- Reduced supervision or emotional support
- Feelings of shame, confusion or isolation
- Barriers to attendance, learning and behaviour

- Increased risk of exploitation or harmful peer associations
- Limited or fragmented communication between courts, police, social care and school

We recognise that children with family members in prison may not always disclose their situation, and staff must maintain professional curiosity.

The DSL and pastoral team will:

- Provide trauma-informed support
- Monitor attendance, behaviour and wellbeing
- Liaise with social workers or Family Help teams where appropriate
- Consider whether the child requires Early Help, Family Help or additional pastoral intervention
- Be alert to online risks, including bullying, harassment or exposure of family circumstances on social media
- Ensure staff understand the stigma and emotional impact associated with parental imprisonment

Support for children with a family member in prison is available here:

<https://www.nicco.org.uk/userfiles/downloads/5ad4850cb565e-action-for-prisoners-families-young-peoples-booklet.pdf>

<https://www.nicco.org.uk/>

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff

Complaints against staff that may require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 3).

This includes concerns relating to:

- Teachers
- Supply teachers
- Volunteers
- Contractors
- Any adult working with pupils on or off site

Where a complaint or concern meets the threshold for a safeguarding allegation, the headteacher (or chair of governors, if the allegation concerns the headteacher) will follow statutory procedures and consult the Local Authority Designated Officer (LADO).

14.2 Whistle-blowing

Our whistle-blowing policy sets out how staff can raise concerns about poor or unsafe practice, including safeguarding concerns. The whistle-blowing policy can be found [here](#)

Staff can also contact:

- The LADO
- The NSPCC Whistleblowing Advice Line
- The governing board's safeguarding lead

Whistle-blowing concerns will always be taken seriously and handled in line with statutory guidance.

15. Record-keeping

We will hold records in line with our records retention schedule and statutory requirements.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Safeguarding concerns and referrals will be kept in a separate child protection file for each child.

Access and Security

- Non-confidential records will be readily accessible.
- Confidential information will be held securely and only accessible to those with a professional need to see it.
- Digital safeguarding records will be stored in secure systems with appropriate access controls.

Retention

Safeguarding records relating to individual children will be retained for a reasonable period after they leave the school, in line with statutory guidance and our retention schedule.

Transferring Child Protection Files

If a child with safeguarding concerns moves to another school, the DSL will ensure their child protection file is:

- Transferred securely
- Sent separately from the main pupil file
- Forwarded promptly, within:
 - 5 days for an in-year transfer
 - The first 5 days of the start of a new term

Where concerns are significant or complex, or where social care is involved, the DSL will:

- Speak directly to the receiving school's DSL
- Provide relevant information to support transition
- Ensure the receiving school has time to prepare appropriate support and risk management

Additional Record-Keeping Requirements

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

All staff will undertake safeguarding and child protection training at induction, including whistle-blowing procedures and online safety. This ensures staff understand the school's safeguarding systems, their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated into the whole-school safeguarding approach, aligned with wider staff training and curriculum planning
- Be in line with advice from the three safeguarding partners
- Include online safety, including expectations, roles and responsibilities relating to filtering and monitoring
- Cover emerging risks identified in KCSIE 2026, including:
 - Misogyny and incel-linked content
 - Harmful sexual content
 - Digital coercion
 - Financial exploitation
 - Modern slavery

- Child-on-parent abuse
 - Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. and prevent them from becoming terrorists or supporting terrorism

Staff will also receive regular safeguarding, online safety and child protection updates, including via:

- Weekly Safeguarding Snapshot briefings
- Emails, e-bulletins and staff meetings
- The staff safeguarding library on One Drive
- Additional updates when new risks or guidance emerge

To monitor understanding and impact, staff will complete half-termly quizzes on topics covered in training.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, proportionate to their role.

16.2 The DSL and Deputy

The DSL and deputy will undertake child protection and safeguarding training at least every two years.

In addition, they will update their knowledge and skills at regular intervals and at least annually for example, through:

- E-bulletins
- DSL Networks and meetings
- Reading and digesting safeguarding developments
- Local safeguarding partnership updates

They will also undertake Prevent awareness training.

Training for DSLs will ensure they have:

- A strong understanding of filtering and monitoring systems, including reviewing reports and identifying patterns of concern
- Knowledge of emerging risks (misogyny/incel-linked content, online sexual harm, digital coercion, extremist content)
- Confidence in managing sexual violence and sexual harassment cases
- Understanding of Family Help, Early Help thresholds and multi-agency working
- Skills to lead safeguarding across attendance, behaviour, SEND, mental health and online safety

16.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This ensures governors:

- Have the knowledge needed to perform their strategic safeguarding functions
- Understand their responsibilities, including providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support a whole-school approach to safeguarding
- Understand the DfE's Filtering and Monitoring Standards and their oversight role

As the chair of governors may be required to act as the case manager in the event of an allegation against the headteacher, they receive specific training on managing allegations.

16.5 Staff who have contact with pupils and families

All staff who have contact with children and families will receive regular safeguarding supervision.

Supervision will:

- Provide support, coaching and professional development
- Promote the interests, safety and wellbeing of children
- Allow for confidential discussion of sensitive issues
- Strengthen staff confidence in managing complex safeguarding cases
- Ensure staff are able to reflect on practice, decision-making and emerging risks (including online harms, misogyny/incel-linked content, digital coercion and Family Help thresholds)

Supervision will be delivered in line with the school's whole-school safeguarding approach and overseen by the DSL.

17. Monitoring arrangements

This policy will be reviewed annually by the DSL Emily Reed, Assistant Headteacher. At every review, it will be approved by the full governing board.

- The governing board will ensure the policy:
- Reflects current statutory guidance, including KCSIE 2026
- Aligns with the DfE's Filtering and Monitoring Standards
- Supports a whole-school approach to safeguarding
- Responds to emerging risks and local safeguarding trends
- Is consistent with multi-agency safeguarding arrangements

18. Links with other policies

Links to the following policies and procedures below can be found [here](#):

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Mobile Phone Policy
- Equality
- Relationships and sex education
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Recruitment Policy (including Safer Recruitment)
- Whistleblowing
- ICT Acceptable Use Policy
- Mental Health

Policy Agreed by Governors:

To be reviewed: July 2027

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and wider safeguarding issues are rarely standalone events that fit neatly into one definition. In most cases, multiple issues overlap, and children may experience several forms of harm simultaneously, including online-facilitated abuse.

Physical abuse 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 is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Exploiting or corrupting children

Emotional abuse can also occur online, including through misogynistic/incel-linked content, digital coercion, harassment, or exposure to harmful sexual content.

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 oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- 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 online grooming)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse and children can abuse other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

Neglect may also include unresponsiveness to a child's basic emotional needs, including ignoring distress, failing to provide affection, or failing to support the child's mental health.

Appendix 2: allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

This appendix is based on Part 4 of Keeping Children Safe in Education (2026) and applies to all adults working in or on behalf of the school, including:

- Staff
- Supply teachers
- Volunteers
- Contractors
- Adults using the school premises to run activities for children

This appendix covers:

- Section 1: Allegations that may meet the harm threshold
- Section 2: Concerns that do not meet the harm threshold (low-level concerns)

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school
- Reference to online behaviour, including misogyny/incel-linked content, harmful sexual content, digital coercion, extremist content, inappropriate AI use, and deepfakes.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement. The case manager must review filtering and monitoring logs where allegations involve digital behaviour.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. The case manager must consider trauma-informed practice and emotional impact on children and staff.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children

- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **DSL advises case manager on digital safeguarding risks and filtering/monitoring evidence.**
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer

what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate
- **Support will be trauma-informed, including wellbeing check-ins.**
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- **Case manager must consider the child's wishes and feelings when planning next steps.**
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- **Conduct involving AI-generated harmful content (e.g., deepfakes, sexualised content) may meet DBS threshold.**

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, **case manager must escalate delays to the LADO.**

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, **a referral to Family help where concerns indicate unmet needs** or children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care or **Family Help** may be appropriate where concerns indicate unmet needs.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. **This includes to social media rumours, online speculation, and digital confidentiality breaches.**

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality

- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. **Digital evidence and filtering/monitoring logs must be included where relevant.**

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – 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 of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils
- Misogynistic/incel-linked content
- Harmful sexual content
- Digital coercion
- Inappropriate AI use
- Extremist content

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff behaviour policy/code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Patterns may include repeated digital behaviour flagged by filtering/monitoring systems.
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer. The school will request the agency's safeguarding history where patterns emerge.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 3: Specific safeguarding issues

This appendix summarises key safeguarding issues referenced in Keeping Children Safe in Education (2026). These issues rarely occur in isolation; children may experience multiple, overlapping risks, including online-facilitated harm. Staff must maintain professional curiosity and report concerns to the DSL (or deputy).

Emerging and Contextual Risks

KCSIE identifies several emerging risks that staff must be alert to:

- Misogyny and incel-linked content influencing attitudes, peer-on-peer abuse, sexual harassment and extremist pathways
- Harmful sexual content online, including pornography, sexualised memes, and coercive digital behaviour
- Digital coercion, including sextortion, blackmail, and pressure to share sexual images
- AI-generated harmful content, including deepfake sexual imagery, AI-generated harassment, grooming or extremist content
- Online financial exploitation, including crypto scams, money-muling and financial grooming
- Child-on-parent abuse, including violence, intimidation and coercive control
- Modern slavery, including forced labour, domestic servitude and exploitation
- Online extremist content, including radicalisation through social media, gaming platforms and AI-generated propaganda

Staff must report any concerns immediately to the DSL.

Online Safety and Digital Harm

Children face significant risks online. Staff must understand:

- The four categories of online risk: content, contact, conduct and commerce
- The role of filtering and monitoring systems, including how alerts are reviewed and escalated
- Risks from AI tools, including deepfakes, grooming, sexualised content and extremist material
- The impact of social media rumours, online harassment and exposure of identities following incidents
- Sextortion, digital blackmail and coercive control
- Financial exploitation (crypto scams, money-muling, online fraud)
- Online misogyny, incel ideology and harmful sexual content
- Online bullying, including anonymous or group-based harassment, Social media fallout after incidents

The DSL must understand the school's filtering and monitoring systems and review digital evidence where relevant.

Mental Health and Safeguarding

Mental health concerns may indicate abuse, neglect or exploitation. Staff must be alert to:

- Sudden changes in behaviour
- Withdrawal or isolation
- Self-harm or suicidal ideation
- Exposure to harmful online content

The DSL must consider whether mental health concerns require safeguarding intervention.

Children who are absent from education

A child being absent 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.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These 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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Children with a Social Worker

Children with social workers may experience:

- Adversity
- Trauma
- Barriers to attendance, learning and behaviour

The DSL must consider social worker involvement in all safeguarding decisions.

Modern Slavery and Human Trafficking

Includes:

- Forced labour
- Domestic servitude
- Sexual exploitation
- Criminal exploitation

Indicators include:

- Fearful behaviour
- Lack of personal possessions
- Signs of physical abuse

Exploitation Online

Children may be exploited through:

- Social media
- Gaming platforms
- AI-generated content
- Encrypted messaging apps

Staff must be alert to digital behaviour patterns flagged by filtering/monitoring systems.

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, in exchange for something the victim may need 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.

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.

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 and are subsequently found in areas away from their own
- Regularly missing school or education
- Not taking part in education
- Have been the perpetrator or alleged perpetrator of serious violence (e.g. knife crime), as well as the victim
- Carrying weapons
- Fearful or withdrawn behaviour

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, in exchange for something the victim may need 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.

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.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, 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-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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 children (this is sometimes known as 'teenage relationship abuse')
- 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)
- **Harmful sexual behaviours**
 - 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 nude and semi-nude 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 coercion**)

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

If 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 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse (Including Child-on-Parent 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.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

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. Children who witness domestic abuse are also victims.

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.

Child-on-parent abuse, which may include:

- Violence
- Intimidation
- Coercive control
- Emotional manipulation

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.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, 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.

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputy will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

'Honour-based' abuse (including FGM and forced marriage)

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.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out

- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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 1 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 also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmfu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups 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.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism ~~to an extremist ideology~~. 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.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment 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 any form of abuse, exploitation or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

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:

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

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

Attempt to contact the named adults who have responsibility for the child.

Notify the DSL or Deputy.

Missing pupils

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

Contact the DSL.

Contact the named adults who have responsibility for the child.

If appropriate notify the police of the missing child.

Skin betting

Skin betting is a growing problem where children win virtual items, like online weapons in games (the item is known as a 'skin') which can then be sold for real money. It is estimated that 370,000 children between the ages of 11-16 on a weekly basis, spend their own money on purchasing such items. This can obviously lead to significant debt and leads to further vulnerability, e.g. from gangs.

Private fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse, exploitation and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated Safeguarding lead when they become aware of private fostering arrangements. The designated Safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family
- host families for language schools
- parental ill-health
- where parents who have moved away, but the child stays behind (eg. to stay at the same school to finish exams)
- teenagers estranged from their families

Appendix 4: Sharing nudes and sexting

Sharing nudes and semi-nudes (previously known as 'sexting')

The Definition of Sexting

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting' as defined by police guidance and therefore the school has defined sexting as:

- the sharing of sexual imagery by young people;
- creating and sharing sexual photos and videos.

How the School will handle an incident

All incidents involving youth produced sexual imagery will be responded to in line with the school's Safeguarding and Safeguarding (Child Protection) Policy.

When an incident involving youth produced sexual imagery comes to the school's attention, the incident should be referred to the DSL as soon as possible.

The DSL should hold an initial review meeting with appropriate school staff and there should be subsequent interviews with the young people involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a teacher, the DSL in school, or any member of the school or college staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school, or inform the police directly.

All members of staff (including non-teaching) are made aware of how to recognise and refer any disclosures of incidents involving youth produced sexual imagery. This is covered within staff training.

Any direct disclosure by a young person is taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

Initial review meeting

The initial review meeting should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery **should not be** viewed
- What further information is required to decide on the best response
- Whether the imagery 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 from devices or online services
- Any relevant facts about the young people 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 should be involved

An immediate referral to police and/or children's social care will be made if at this initial stage:

1. The incident involves an adult
2. 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).
3. The school knows about the image and suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
4. The imagery involves sexual acts and any pupil in the imagery is under 13.
5. The school has reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

If none of the above apply, then the school may decide to respond to the incident without involving the police or children's social care (a school can choose to escalate the incident at any time if further information/concerns come to light).

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and if appropriate local network of support.

The decision will be made by the DSL with input from the Headteacher and input from other members of staff if appropriate. The decision will be recorded in line with school Policy.

The decision will be made in line with the school's Safeguarding/Child Protection procedures and will be based on consideration of the best interests of the young people involved. This will take into account proportionality as well as the welfare and protection of the young people. The decision will be reviewed throughout the process of responding to the incident.

How the School will Assess the Risk

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks, the following should be considered:

- Why was the imagery shared?
- Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery?
- Where has the imagery been shared?
- Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the pupils involved?
- Do the pupils involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

DSLs should always use their professional judgement in conjunction with their colleagues to assess incidents.

Informing parents (or carers)

Parents (or carers) will be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm. Any decision not to inform the parents will generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed.

DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases, DSLs may work to support the young people to inform their parents themselves.

Reporting incidents to the police

If it is necessary to refer to the police, contact will be made through existing arrangements. This may be by dialling 101.

Once a report is made to the police, the report has to be recorded and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

Securing and handing over devices to the police

If any devices need to be seized and passed onto the police then the device(s) may be confiscated and the police will be called. The device will be turned off and placed under lock and key until the police are able to come and retrieve it.

Children's social care contact and referrals

If the DSL is aware that children's social care are currently involved with a young person involved in an incident of youth produced sexual imagery then they will contact children's social care. They will also contact children's social care if they believe they may be involved, or have been involved with a young person in the past.

If as a result of the investigation the DSL believes there are wider issues which meet the threshold for children's social care involvement, then they should make a referral in line with their Safeguarding/Child Protection procedures.

DSLs will ensure that they are aware of, and familiar with, any relevant local policies, procedures and contact points/names which are available to support schools in responding to youth produced sexual imagery.

Holmer Green Senior School make the initial referral to the First Response team.

Searching devices, viewing and deleting imagery

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery.

The decision to view imagery should be based on the professional judgement of the DSL and should always comply with the Safeguarding (Child Protection) Policy and procedures of the school or college. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the pupil. A "good reason" to examine or erase the data on an electronic device would be that the DSL reasonably suspects that the data or file in question has been/could be used to commit an offence, cause harm, to disrupt teaching, or break the school rules.

If a decision is made to view imagery the DSL needs to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)

- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network

If it is necessary to view the imagery then the DSL will:

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Headteacher.
- Ensure viewing is undertaken by the DSL or another member of the Safeguarding team with delegated authority from the Headteacher.
- Ensure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on school or college premises, ideally in the Headteacher or a member of the senior leadership team's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the school's Safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated and meets the wider standards set out by Ofsted for recording Safeguarding incidents.
- If youth produced sexual imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring school systems) then DSLs should ensure that the staff member is provided with appropriate support. Viewing youth produced sexual imagery can be distressing for both young people and adults and appropriate emotional support may be required.

Deletion of images

If the school has decided that other agencies do not need to be involved, then consideration should be given to deleting imagery from devices and online services to limit any further sharing of the imagery. If, however, the material on the device is suspected to be evidence relevant to an offence, it should not be deleted prior to giving to the police.

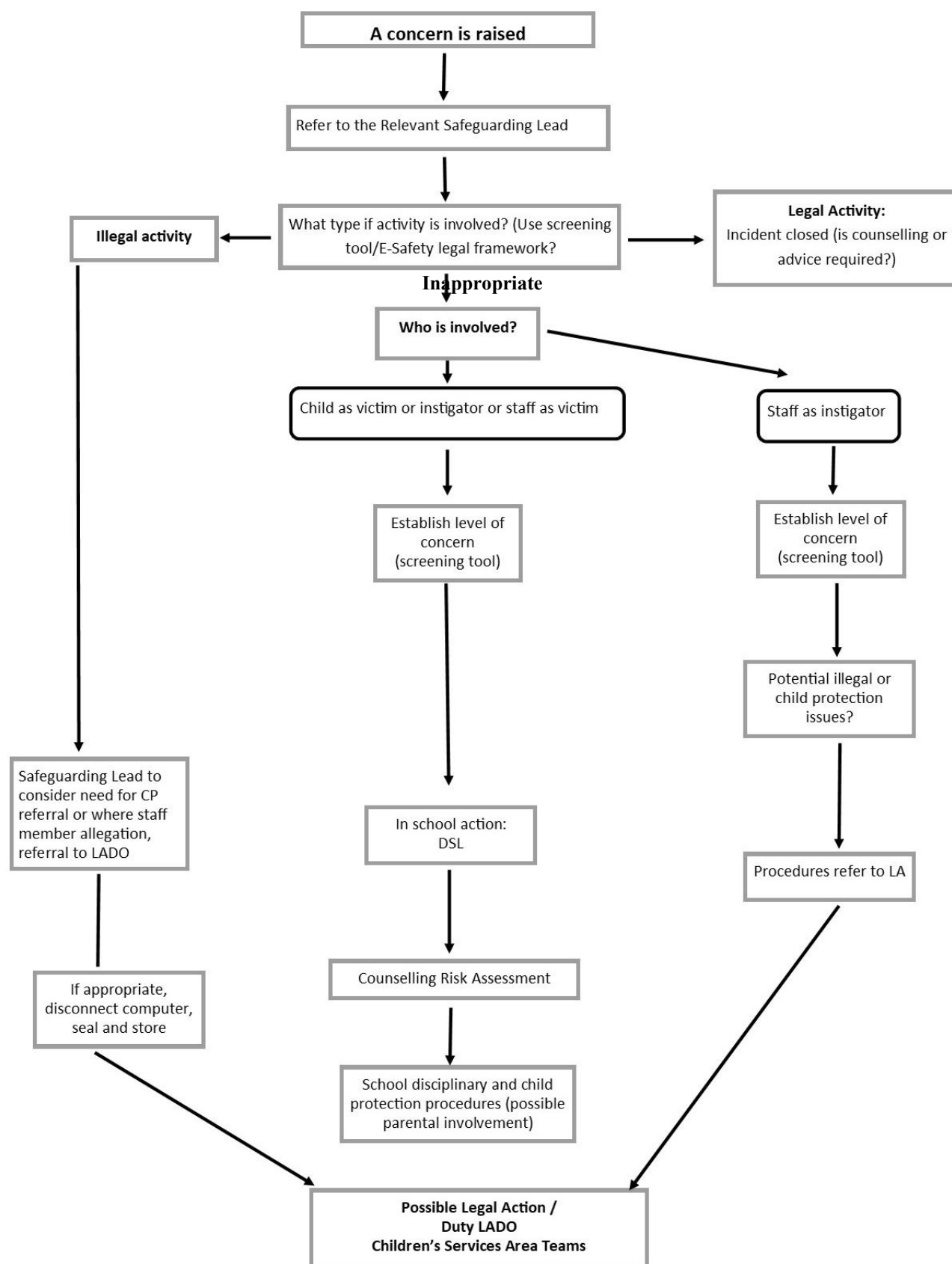
The Searching, Screening and Confiscation advice highlights that schools have the power to search pupils for devices, search data on devices and delete youth produced sexual imagery.

Further Guidance

The school will adhere to additional guidance set out in:

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020)

Appendix 5: What to do if you have an E-safety concern



Screening Tool

This screening tool can be used to assist decision making in dealing with incidents of computer or e-communications misuse within school. It can be used to inform initial action but is not a substitute for a thorough risk assessment / investigation.

This should be used alongside the e-Safety flow chart and incidents of misuse matrix.

If you are concerned that a child may have been a victim of a criminal offence or suffered child abuse, please contact a member of the Children's Safeguard Service.

Type of incident

- Sexual ☐
- Bullying ☐
- Violence ☐
- Incitement ☐
- Financial ☐
- Grooming ☐
- Other ☐

How was the incident discovered?

- Self reported ☐
- Reported by 3rd party (friends or parents) ☐
- Reported by Teacher ☐
- Other (e.g. Police or Internet Watch foundation) ☐

What was their response to the incident?

- Unconcerned ☐
- Curious ☐
- Distressed ☐
- Frightened ☐
- Secretive ☐
- Other ☐

What did the incident refer to?

Answer the key questions relating to the particular incident

Child as Victim:

Content

1. What was the type of content? (Sexual, violence, racial, other)
2. Did anyone else see it?
3. Have they told anyone else about it?

Publishing

1. Is the child identifiable?
2. Can their location be traced/
3. Is text or image potentially indecent or illegal?

Bullying

1. What was the type of bullying? (sexual, violent, physical, group)
2. Were information or images published of the child?
(If yes, refer back to publishing section for more questions to ask)

Predation / Grooming

1. Assess the extent of the contact :
 - One off conversation
 - Regular conversation
 - Regular conversation using inappropriate or sexualised language or threats
 - Attempts to breakaway
 - Offline meeting arranged
 - Offline meeting occurred(Consider if an offence has occurred)
2. Are the parents aware?
3. When did the incident occur?

Request for information

1. Did the child give out any personal information?

Child as Instigator:

Content

Refer to 'Child as Victim' questions on content

Refer to AIM project matrix to assess the child's response to the content

Incitement

1. Was the child secretive about the site?
2. Did the child access the site in an isolated place?
3. Did they understand the risks of accessing this site?
4. Was their response to the site?
 - Healthy (e.g. using for research)
 - Problematic (looking for advice or guidance)
 - Harmful (relying on site for tips, using site to communicate with likeminded individuals, the site is reinforcing /minimising potentially harmful behaviours e.g. self-harm, pro anorexia sites)

Send/Publishing

1. Has an offence taken place?
(Refer to glossary for information on what constitutes an offence)
2. Were others put at risk e.g. their image / information was sent / published
3. Was this an isolated incident or persistent?
4. Did the instigator have empathy for the victim?

Interception of communications / Hacking

1. Have they placed themselves or others at risk?
2. Has personal or financial information been stolen?
(If yes, this constitutes a criminal offence and advice should be sought from the police)
3. Has illegal content been accessed and sent to other's computers?

Once you have gathered the appropriate information, assess the effect of the incident on the child and identify how the child can be best supported. This may be either in school (using existing policies and resources to support children) or in certain circumstances with external help.

Staff misuse

Did the member of staff misuse the school's internal email system?

Did the member of staff communicate with a young person inappropriately e.g. via text message, multimedia images.

Consider the extent of the communication

- One off conversation
- Regular conversation
- Regular conversation using inappropriate or sexualised language or threats
- Attempts to breakaway
- Offline meeting arranged
- Offline meeting occurred

Did the member of staff access inappropriate/ illegal material within school?

Did the member of staff access inappropriate/ illegal material using school equipment?

Did the member of staff access inappropriate/ illegal material using their own equipment?

If you are concerned that a child may have been a victim of a criminal offence or suffered child abuse, please contact the child protection officer before taking any other action.

Appendix 6: Safeguarding/Child Protection procedures

Holmer Green Senior School - Safeguarding/Child Protection Procedures:

You are concerned about a student OR a student makes a disclosure to you. ↓ Make sure the student is in a safe place. ↓ Tell Designated Safeguarding Lead or deputy DSL immediately. ↓ As soon as possible complete ROSC referral.	You are concerned as a result of a disclosure about a member of staff at Holmer Green Senior School. ↓ Make sure the student is in a safe place if relevant – for example take to Pastoral ↓ Tell the Headteacher immediately. Do not discuss details with others in the school (staff, students, or parents) ↓ If the Headteacher is absent, inform the Deputy Head or most senior member of school staff who is deputising.
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Appendix 7: Safeguarding expression of concern

Safeguarding Procedures **Expression of Concern Record**

Use this form to make a record of the concern you have and pass this to the Designated Safeguarding Lead as soon as possible on the day on which your concern arose.

Staff Name:

Date:

Student/s of Concern:

Tutor

Group: Situation during which your concern arose:

Please describe as accurately as possible what was said / overheard which causes you to be concerned about this student:

Please note the action you have taken as a result of your concern (include any discussions you have had and actions taken)

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Appendix 8: Confidentiality and Information sharing

Confidentiality and Information Sharing Guidance from Safeguarding Board

All information obtained by school staff about a student and their family is confidential and will be shared with other professionals and agencies once the family have been informed.

If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 or over are able to give their own consent

Where a child is at risk of suffering significant harm, schools have a legal duty to share this information with Children's Social Services and make appropriate referrals. Equally, where a child is subject to a Safeguarding/Child Protection investigation, schools must share any information about the child requested by Children's Social Services.

Parental consent to making a Safeguarding/Child Protection referral should be sought but if withheld, the referral must still be made, and parents just made aware of this.

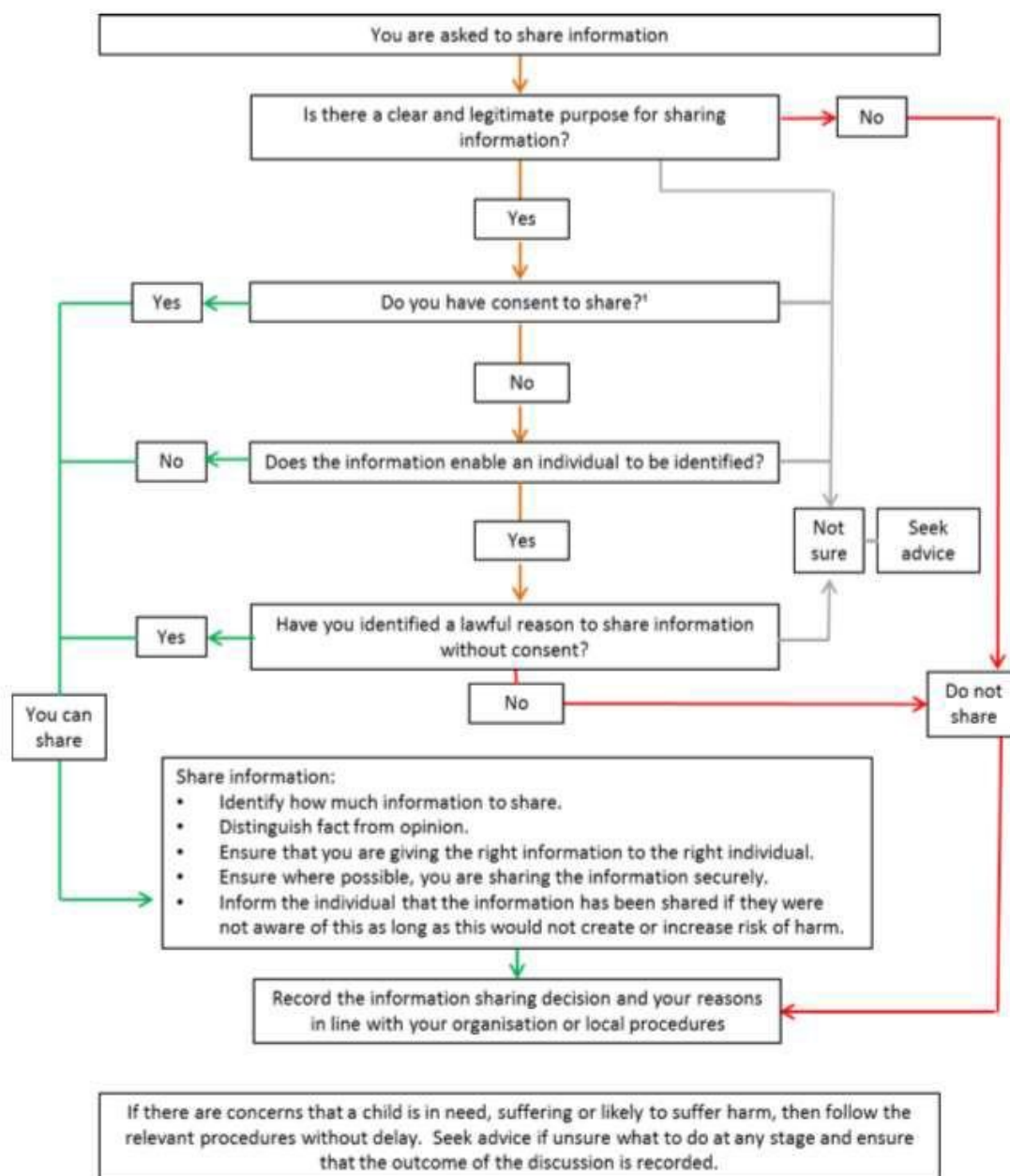
Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure, and remind recipients that the information is confidential and only to be used for the stated purpose.

In the event that a child makes a disclosure of neglect, exploitation or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the school's duty to share information.

Staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated Safeguarding lead or a member of the Senior Leadership Team.

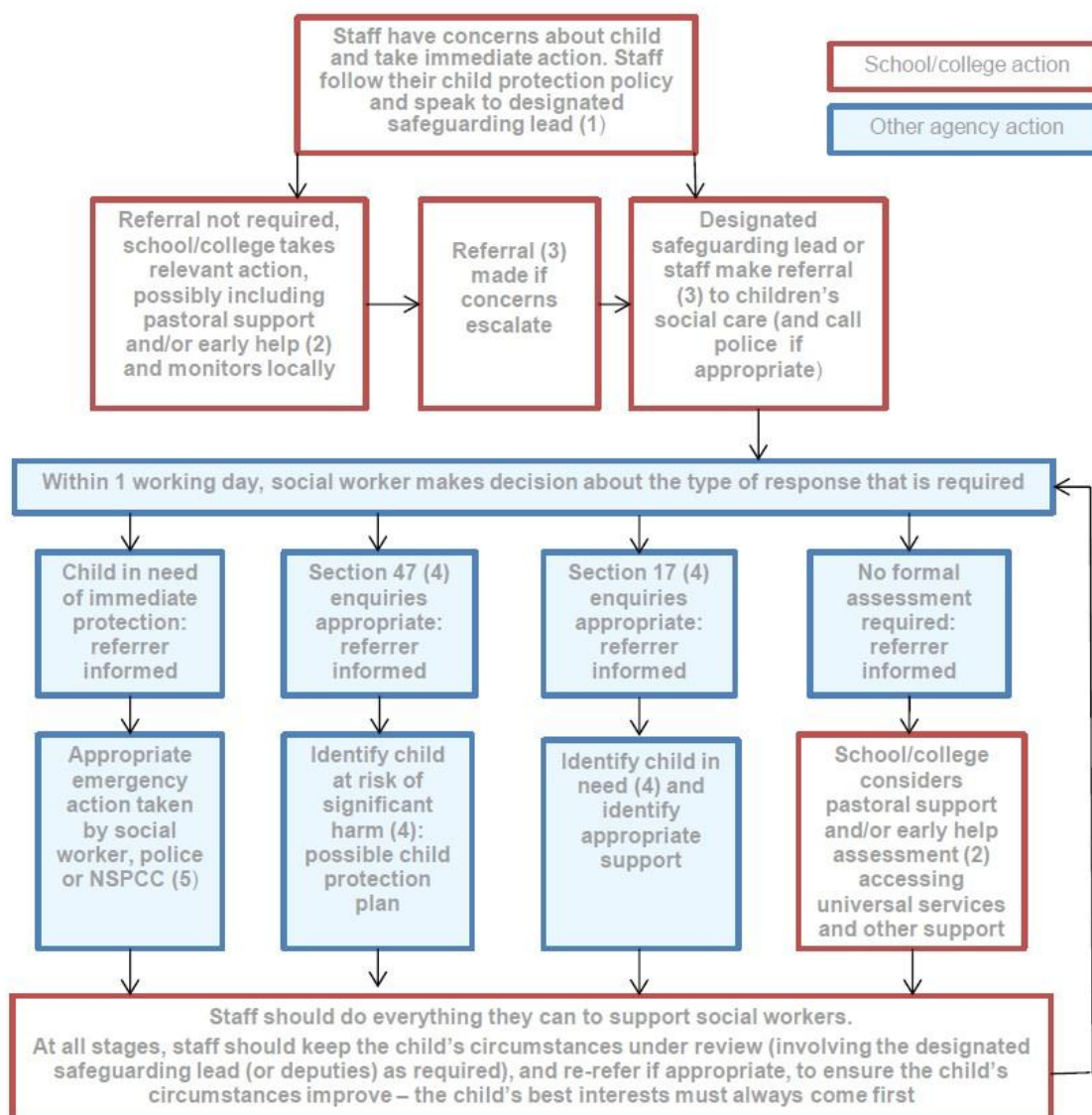
Appendix 9: Flow chart of how to share information

Flowchart of when and how to share information (Dfe Information Sharing July 2018)



Appendix 10: Flowchart for concerns about a child

Actions where 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 as soon as a problem emerges at any point in a child's life. 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](#) 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](#).

(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](#).

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

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Appendix 11: Individual Student Safety Plan

Individual Pupil/Student Safety Plan

Name of the student		Data and student Information	Previous Year(s) <i>If required</i>	Current
Name of the school/academy		FTE (number/period)		
Date of birth		Attendance (%)		
School Year		SEND level		
Start date at school		EAL		
Previous schools		PP		
Safety Plan version		LAC/PLAC		
Safety Plan Lead		Social Care/ Early Help		
Present at Safety Plan meeting		Health Care Plans		
Date of meeting		Other to Note		

Key CPOMS categories reported		Identified Risk(s)	
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Historical context and current concerns	
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Any medication required and possible side effects	
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Location of other documents not held on the safety plan.

Below is to list other key documents that may be held for the student in relation to assessing risk but not as part of this safety plan document due to confidentiality or other such reasons. Please note the location and review dates of these documents.

Document	Complete/Ongoing	Review Date	Review Date	Review Date
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Identified Risk/Hazard	Who May Be Harmed? Who is at risk?	Severity	Likelihood	Control Measure	Who is key to control measure?
anything with the potential to cause harm – building, item, person, situation, event/trigger, behaviour	this could be the student, a visitor, a peer, a member of staff			Now the risk has been identified, what will be done to reduce the risk? The control measures may include interventions from external agencies or parents/carers, as well as those implemented by the academy. Some of the control measures may be repeated against another identified risk NB. Where applicable staff will always refer to and follow the DfE guidance <i>Searching, Screening and Confiscation in Schools (2023)</i> and/or <i>Restrictive interventions, including use of reasonable force, in schools (2026)</i> Searching, screening and confiscation in schools - GOV.UK Use of reasonable force and other restrictive interventions guidance	Named Lead Plus 1

In -School Support Intervention	Date	External Services Support	Date

Table 2 - RISK RATINGS - Please note - Severity may also include risk to psychological health of an individual.					
SEVERITY		LIKELIHOOD	RISK RATING	ACTION REQUIRED	
5	Death, debilitating injury (incl. psychological)	5 It is expected to happen in most circumstances	Unacceptable	Stop	Stop activity and take immediate action
			High	Urgent action	Take immediate action, stop activity if necessary, maintain existing controls rigorously.
4	Major injury – broken bone, deep lacerations, unconsciousness, significant psychological harm	4 Will probably occur at some time, or in most circumstances	Medium	Action required	Improve within a specified timescale
			Low	Monitor	Seek to improve at the next review or if there is a significant change
3	Moderate injury - sprains, strains, lacerations, hospital referral, emotional / psychological support	3 Fairly likely to occur at some time, or in some circumstances	Trivial	No action	No further action, but ensure controls are maintained and reviewed
2	Minor injury – superficial cuts, 1 st Aid required, emotional support	2 It is unlikely to, but could, occur at some time			
1	Trivial injury - Minor impact - bumps, bruises, emotional wellbeing	1 May only occur in exceptional circumstances			

Parental Statement

1. I have read through this document and have been given the opportunity to express my opinion.
2. If my child can process the information contained in this document then they have been involved in the production of this document.
3. I am aware of which members of staff are my contacts to ask questions about the information contained in this document and the process of regular review that will take place in the different sections.

4. I understand that I am responsible for keeping the academy up to date with any information affecting the health, safety and wellbeing of my child and that any information given will be treated with sensitivity and confidentiality in line with GDPR, other than if matters of a safeguarding nature prevent this from being the case.
5. I have been made aware of the legislation related to holding a child (section 93 of the Education and Inspections Act)
6. I understand that this safety plan may need to be shared with outside agencies.
7. I understand this safety plan may need to be updated and these updates will be shared with me.

Signature of Parent/Carer			Date		
Signature of Student			Date		
Signature of Academy Lead			Date		
Review dates:					
Review date:	Review date:	Review date:	Review date:	Review date:	Review date:
Signed:	Signed:	Signed:	Signed:	Signed:	Signed:
Updates: (Green font)	Updates: (Amber font)	Updates: (Red font)	Updates:	Updates:	Updates:
Communicated to:	Communicated to:	Communicated to:	Communicated to:	Communicated to:	Communicated to:

Completing the Risk Audit

Note: The primary function of the risk audit pro forma set out overleaf is that of a diagnostic tool, allowing for the compilation of an accurate and comprehensive individual pupil behaviour profile. It is also possible to use the same form for carrying out a formal risk assessment, although in cases where numerous or detailed control measures are required, the 'ACTION' column may lack sufficient space.

- Consider what sorts of behaviour are likely to be exhibited by the pupil in question. What hazards might arise as a result of the behaviour? Find out if there is a pattern to the behaviour. Does it happen at a particular time or place? Is there something usually going on immediately before or after? Is there any way of predicting it? Are there circumstances which make the behaviour more likely to occur?
- Based on past evidence, common sense and likelihood of occurrence, think about the impact of this behaviour - who is likely to be harmed and how? **Life-threatening** = fatality, hospitalisation, long-term absence etc; **Serious** = requiring medical treatment and, usually, absence from work; **Harm** = e.g. 1st Aid, possible GP check-up and/or treatment.
- How likely is this behaviour? How frequently has the behaviour happened in the past? How recently? Is it possible to make realistic predictions for the future? On what grounds? (NB: Where more than one form of poor behaviour has been identified, the combined impact of *all* of them should be considered when determining the likelihood and frequency of harm arising).
- Calculate the numerical risk factor by multiplying **likelihood x frequency x harm**. Any resulting percentage greater than 1 per cent indicates a measure of risk; a figure of 100 per cent means it is certain to happen.
- Evaluate the risks and decide what recommendations might be made for further action. Is a full risk assessment required, together with suitable control measures? Are existing precautions – where applicable – sufficient, or should further steps be taken?
- It is important that the 'percentage chance' of harm occurring is not seen as a single, authoritative predictor of future outcomes.
- It is merely one indicator of several which can assist those charged with tackling such behaviour in schools. The action to be taken will clearly depend on the type(s) of behaviour identified. A ten per cent chance of a pupil carrying a knife, for example, clearly poses a greater level of possible harm than a ten per cent chance of a pupil verbally abusing somebody. As a general rule, any percentage risk of more than one per cent should be closely analysed, and where the potential harm is calculated as a score of two or more, this becomes even more important.
- Decide when this audit should be reviewed (for example, in 6 months' time, or sooner if behaviour patterns change). If a formal risk assessment is required, then reviews should follow automatically as part of the risk assessment process

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