


ST TERESA of CALCUTTA
Catholic Academy Trust

# CHILD PROTECTION & SAFEGUARDING POLICY

## Policy Control Sheet

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| **1** | **Policy Title** | **Child Protection and Safeguarding Policy** (Including Safer Recruitment, Allegations Against Staff and Low-Level Concerns) | |
| **2** | **Reference No.** | SCH09 | |
| **3** | **Version number** | 1.2 | |
| **4** | **Policy Author** | Head of Safeguarding | |
| **5** | **Accountable SLG member** | Chief Performance Officer | |
| **6** | **Approving Body** | Trust Board | |
| **7** | **Date of Approval** | Term 3, 25/26 (for Publication: Term 1 26/27) | |
| **8** | **Date of next formal review** | Term 1, 27/28 | |
| **9** | **Policy Level** | Statutory | |
| **10** | **Personalisation required?** | ☒ Y ☐ N | |
| **11** | **Published on** | Trust Website<br>School Website<br>Shared Policy Area | ☐ Y ☒ N<br>☒ Y ☐ N<br>☒ Y ☐ N |
| **12** | **Related documents (if applicable)** | Low level Concerns<br>Visitor Policy<br>Whistleblowing<br>Central Child Protection Policy | |
| **13** | **Applies to** | ☒ All Staff and Volunteers<br>☐ Support Staff<br>☐ Teaching Staff | |
| **14** | **Consulted on with relevant stakeholders (Union, legal, staff)** | ☐ Y ☐ N ☒ N/A | |

## Summary of Changes

| Date | Version | Action | Summary of Changes |
|---|---|---|---|
| July 2025 | 1.0 | New Policy | Full policy re-write and alignment with KCSIE 2025 |
| July 2026 | 1.1 | To reflect amendments to KCSIE 2026 and Working Together to Safeguard children 2026 | This policy has been reviewed to reflect the changes and expectations KCSIE 2026 and Working Together to Safeguard children 2026 |

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## Summary of KCSIE 2026 Changes Leading to Amendments and Updates

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| **Stronger emphasis on safeguarding responsibility and recognition of being child centred** | • Trust aims addition Safeguarding practice is child-centred, trauma informed and responsive to need<br>• All staff; volunteers and governors, have a duty to safeguard and promote the welfare of children. |
| **Addition to statutory safeguarding responsibilities** | The school recognises and complies with emerging statutory safeguarding responsibilities, including:<br><br>• The **serious violence duty**, requiring collaboration with local partners to prevent and reduce serious violence.<br>• The principles of the **Homelessness Reduction Act 2017**, recognising homelessness as a Safeguarding risk and ensuring appropriate referrals.<br>• The expectations arising from the **Victims and Prisoners Act 2024**, including support for victims of abuse.<br>• The requirement to work in partnership with Police and local agencies through safeguarding arrangements, including **Operation Encompass**, where applicable<br><br>The school will ensure that safeguarding practice reflects current statutory expectations and multi-agency responsibilities. |
| **Changes to KCSIE Annex references, reflected in this policy** | • Annex A is now the previous Annex B – Further Information<br>• Annex B is previous Annex C – Role of the DSL<br>• Annex C is previous Annex E -Summary of changes |
| **Expanded definitions** | *See paragraphs 3.1 & 3.2*<br><br>• Safeguarding practice recognises that children may experience multiple and overlapping harms, including those occurring both online and offline. Staff must consider the cumulative impact of harm and respond in a coordinated and child-centred way, taking account of each child's lived experience. |
| **Expanded definition of Equality statement** | *See Paragraph 4.1*<br><br>• Schools expected to challenge racism and discrimination<br>• Address derogatory behaviour<br>• Consider disproportionality<br>• Embed anti-discriminatory practice into safeguarding systems |
| **Roles and responsibilities** | 5.3, annex A now removed, stronger wording to promote the requirement of the sections that must be read, understand and applied. |
| **Greater emphasis on Early help changes and multi-agency working** | *See Section 7.0*<br><br>• Updated terminology to include "universal services and community based early help" and "the targeted early help level of Family Help"<br>• Greater emphasis on Contextual safeguarding<br>• Stronger expectations around Professional curiosity<br>• Earlier identification of vulnerability<br>• Stronger multi-agency information sharing |

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| **Mental Health strengthened as a safeguarding issue** | *See Paragraph 7.9.5*<br>• Earlier identification<br>• Whole-school wellbeing<br>• Clear referral pathways<br>• Recognition that mental health may indicate a safeguarding risk<br>• Understanding trauma and cumulative harm |
| **Expansion of child-on-child abuse guidance** | *See Paragraph 7.13*<br>• Misogyny<br>• Serious violence between children<br>• AI-Generated imagery<br>• Online harmful sexual behaviour<br>• Financial exploitation – Sexploitation<br>• Greater focus on coercion and exploitation dynamics |
| **Stronger focus on online safety and Artificial Intelligence (AI)** | *See Section 8.0*<br>• Annual reviews of filtering and monitoring systems<br>• Formal records of filtering and monitoring checks<br>• Increased awareness of AI-Generated harms<br>• Recognition of deepfakes and AI Generated Images, sexual content |
| **Mobile phone free school expectations** | *See new section added '9.0 Mobile Phone Safety'.*<br>This sets out mobile phone expectations<br>Schools will implement clear expectations regarding pupil access to mobile phones during the school day.<br>As part of a whole-school safeguarding approach, this will typically include restricting access to mobile phones throughout the school day unless a specific safeguarding or medical need is identified. |
| **Gender Questioning & RSHE Guidance** | *See Section 14.0*<br>• Schools should not automatically support social transitioning<br>• Decisions must be risk assessed and carefully recorded<br>• Safeguarding and best interests remain paramount<br>• Parents should generally be involved (consider safeguarding implication)<br>• Schools should consider vulnerabilities including bullying, mental health and exploitation risks. |
| **Expansion of appendix 2.0, Safer recruitment** | See Appendix 2.0 Addition to Safer Recruitment principles |
| **Stronger expectations around evidence and record keeping related to domestic abuse** | *See Section 16.0 and Appendix 4, Section 9.8*<br>Record keeping in general is a recurring theme in the document with an expectation that safeguarding decisions are:<br>• Professionally reasoned<br>• Capable of scrutiny |

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| **Governance and Strategic implications for the Trust** | The guidance does seem to place an increased expectation on Trusts and governing bodies:<br>• To evidence safeguarding oversight<br>• Review filtering and monitoring annually<br>• Demonstrate impact<br>• Maintain stronger safeguarding records<br>• Ensure staff understand emerging risks |
| **Key overall theme** | KCSIE 2026 Proposals are aimed towards:<br>• Earlier intervention<br>• Vulnerability -led safeguarding<br>• Online and contextual safeguarding<br>• Stronger governance and accountability<br>• Better evidenced professional judgement<br>• Greater focus on culture and lived experience. |

## Important Contacts

| ROLE/ORGANISATION | NAME | CONTACT DETAILS |
|---|---|---|
| Designated safeguarding lead (DSL) | Rebecca Ashcroft | 01204 332658<br>office@stgregorys.stoccat.org.uk |
| Deputy DSL | Catherine Callow<br>Laura Boothroyd | 01204 332658<br>office@stgregorys.stoccat.org.uk |
| Local authority designated officer (LADO) | Lisa Kelly | 01204 337474<br>LADO@bolton.gov.uk |
| Head of Attendance and Safeguarding<br>Safeguarding Manager | Joanne Davies<br>Pauline Baker | 01617054374<br>jdavies@stoccat.org.uk<br>pbaker@stoccat.org.uk |
| Local Governing Body Chair | Lee Berry | |
| Channel helpline<br>L.A. PREVENT Lead | Carlo Schroder | 020 7340 7264 |

| ROLE/ORGANISATION | NAME | CONTACT DETAILS |
|---|---|---|
| STOC Safeguarding partner's contacts:<br><br>To report concerns of risk or significant risk of harm | Bolton | 01204 331500/out of hours<br>01204 337777 |
| | Bury | 0161 253 5678/out of hours<br>0161 253 6606 |
| | Rochdale | 0300 303 0440 |
| | Salford | 0161 206 0604/out of hours<br>0161 794 8888 |

## 1.0 Aims

1.1 Our mission at STOC, as a Catholic Academy Trust, is to Make Christ Known and ensure we are Making lives better for our communities, our children and young people and all our stakeholders.

The Trust aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff understand that safeguarding is everyone's responsibility
- Staff are properly trained in recognising and reporting safeguarding issues.
- *Safeguarding practice is child-centred, trauma informed and responsive to need.*
- *All staff; volunteers and governors, have a duty to safeguard and promote the welfare of children.*

1.2 We have a duty as a Catholic School to follow the Church's teaching, care for the poor and educate those who are socially, academically, physically or emotionally disadvantaged. There is a duty to make the person of Jesus Christ known and loved, and to place Him and the teachings of the Catholic Church at the centre.

## 2.0 Legislation and Statutory Guidance

*2.1 This policy has been updated to reflect the statutory requirements contained within* statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Academy trust governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

2.2 **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
- Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where

they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes the duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children

- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage
- This policy also complies with our funding agreement and articles of association.

2.3 School Leaders must refer to locally agreed multi-agency procedures that have been put in place by the 3 safeguarding partners (Health, Police and Social Care). This policy has been adapted to reflect the local procedures in regard to the Local Authority the school is located in.

*2.4 The school recognises and complies with emerging statutory safeguarding responsibilities, including:*

- *The **serious violence duty**, requiring collaboration with local partners to prevent and reduce serious violence*
- *The principles of the **Homelessness Reduction Act 2017**, recognising homelessness as a Safeguarding risk and ensuring appropriate referrals.*

- *The expectations arising from the **Victims and Prisoners Act 2024**, including support for victims of abuse*
- *The requirement to work in partnership with Police and local agencies through safeguarding arrangements, including **Operation Encompass**, where applicable*

*The school will ensure that safeguarding practice reflects current statutory expectations and multi-agency responsibilities.*

2.5 *The school is a relevant safeguarding agency and will:*

- *Cooperate with multi-agency partners*
- *Share information appropriately*
- *Follow local safeguarding protocols*

## 3.0 Definitions

Safeguarding practice recognises that children may experience multiple and overlapping harms, including those occurring both online and offline. Staff must consider the cumulative impact of harm and respond in a coordinated and child-centred way, taking account of each child's lived experience.

3.1 Safeguarding and promoting the welfare of children means:

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

3.2 **Child protection** is part of safeguarding and refers to activity undertaken to protect specific children at risk of significant harm. This includes harm that occurs inside or outside the home, including online.

3.3 **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. The definition of Abuse should also be recognised as child-to-parent/carer abuse Appendix 1 explains the different types of abuse.

3.4 **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.

3.5 **Sharing of nudes and semi-nudes** is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images which are AI-generated images that otherwise appear to be a photograph or video.

3.6 **Children** include everyone under the age of 18.

3.7 The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs.

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

3.8 **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 would want to be described in that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

3.9 **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

## 4.0 Equality Statement

4.1 The Trust is committed to creating an inclusive safeguarding culture in which discrimination, racism and prejudice are actively identified and challenged.

Safeguarding responses must take account of children's lived experiences and protected characteristics to ensure equitable and effective support.

4.2 Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

4.3 We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 11)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, sex, sexual orientation, gender reassignment or other protected characteristics.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers?
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after (see section 12)
- Are missing from education for prolonged periods and/or frequently.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

## 5.0 Roles and Responsibilities

5.1 Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, and governors and directors across our trust and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

5.2 The school is a relevant agency within the local safeguarding partnership and has a statutory duty to:

- Cooperate with safeguarding partners
- Share information appropriately

- Follow local multi-agency safeguarding arrangements

The school will:

- Provide relevant information in a timely manner
- Act in accordance with local safeguarding protocols
- Contribute to multi-agency assessments and plans
- Maintain an attitude of "it could happen here"
- Identify and act on concerns immediately
- Demonstrate Professional curiosity

5.3 Trust and school play a crucial role in preventative education. This is in the context of a whole-trust approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, racism, homophobia, biphobia, transphobia and sexual violence/harassment.

5.3.1 This will be underpinned by the schools:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships
  - Boundaries and consent
  - Stereotyping, prejudice and equality
  - Body confidence and self-esteem
  - How to recognise an abusive relationship (including coercive and controlling behaviour)
  - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called Honour-based violence such as forced marriage and FGM and how to access support.
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable

### 5.4 All Staff

5.4.1 All Staff **must** read, understand and, where relevant, apply part 1 of KCSIE 2026.

5.4.2 Any central staff who work in an office not on school sites but are likely to have access to information about children, or may visit schools, **must** read and understand part 1 of KCSIE 2026 and apply where relevant.

5.4.3 Copies of policies and Part One of this document should be provided to **ALL STAFF** at induction.

5.4.4 All staff should remain professionally curious where indicators suggest a child may have caring responsibilities and share concerns with the Designated Safeguarding Lead so that appropriate support can be given.

5.4.5 Sign a declaration at the beginning of each academic year to say that they have engaged with part one and understand safeguarding concepts, not just definitions.

5.4.6 Reinforce the importance of online safety when communicating with parents and carers. This includes making parents/carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)

5.4.7 Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

5.4.8 **All staff will be aware of:**

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education/who are absent from education
- Be aware of the school's unauthorised absence procedures and children missing education procedures
- All staff should be prepared to identify children who may benefit from Family Help. Family Help means providing support as soon as a problem emerges at any point in a child's life, from foundation years through to the teenage years.
- All staff should be aware of the process for community-based Family Help assessments, as set out in paragraph 13 KCSIE 2026 and explained in detail in Working Together to safeguard children 2026.
- Family help may be particularly appropriate where caring responsibilities are impacting on a child's safety, attendance, behaviour, health, emotional wellbeing or educational progress, including where the child is identified as a young carer.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health and willingness to seek help and should be considered within safeguarding practice where appropriate.
- The safeguarding issues that often overlap and can put children at risk of harm, including:
    - Drug taking and/or alcohol misuse
    - Unexplainable and/or persistent absences from education
    - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
    - Consensual and non-consensual making or sharing of nudes or semi-nudes
- 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 and online.

- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) or questioning their gender can be vulnerable to discriminatory bullying.
- All Staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. In addition, mental health concerns may themselves become safeguarding concerns where there is a risk of harm, including self-harm, suicidal ideation, eating disorders or other behaviours that place a child at risk. Staff should be alert to changes in behaviour, emotional presentation or attendance, share concerns promptly with the DSL and follow safeguarding procedures where appropriate.
- Staff should recognise that some children with medical conditions may have additional safeguarding vulnerabilities and should not assume that all concerns relate solely to a child's medical needs.
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection.

## 5.5 The Designated Safeguarding Lead (DSL)

5.5.1 The DSL is a member of the senior leadership team. The DSL at St Gregory's is R. Ashcroft Acting Deputy. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

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

RAschroft@stgregorys.stoccat.org.uk.

5.5.3 When the DSL is absent, the L. Boothroyd and C Callow – Learning mentor and Acting Headteacher– will act as cover.

5.5.4 If the DSL and deputiesare not available, J Stanton will act as cover (for example, during out-of-hours/out-of-term activities).

5.5.5 The Head teacher will ensure robust safeguarding cover arrangements when the DSL is unavailable, including arranging for safeguarding concerns to be received, monitored and acted upon without delay. This may include dedicated safeguarding email accounts, secure reporting systems and appropriately trained deputies.

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.

- Have a good understanding of the filtering and monitoring systems and processes in place at St Gregorys.
- DSL R Ashcroft as the school's Prevent lead: Make's sure that staff have appropriate Prevent training and induction.

**5.5.7The DSL will also:**

- Keep the Acting Headteacher informed of any issues (if the DSL isn't the headteacher/head of school)
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Ensure appropriate identification, assessment and support for children with caring responsibilities, including liaison with external agencies and young carers' services where appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Ensure mental health concerns are considered within safeguarding assessments, that appropriate referrals are made where required, and that multi-agency support is considered alongside all other safeguarding information to inform assessment of risk.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- Ensure that child protection files are kept up to date. That safeguarding information is shared promptly, securely and appropriately with relevant professionals and transferred to receiving education settings within 5 days in-year, and within the first 5 days of a new term, including consideration of whether additional safeguarding information should accompany the child protection record where necessary to safeguard the child and others. Will ensure child protection records are accurate, complete, current and regularly reviewed.
- The DSL will ensure young carers are identified at the earliest opportunity and appropriate support and referrals are considered.

## 5.6 The Board of Directors

5.6.1 **The Board will:**

- Facilitate a whole-Trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- The Board will ensure an inclusive and anti-discriminatory safeguarding culture in which racism, faith-based prejudice and other discriminatory behaviour are recognised, challenged and addressed.
- Ensure that all staff have read and understood part one Keeping Children Safe in Education 2026 appropriate to their role
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher/head of school 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 (or equivalent) link to monitor the effectiveness of this policy in conjunction with the full board. This is always a different person from the DSL.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils
- Ensure the school has appropriate cyber security systems in place
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness at least once every academic year. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
    - Ensuring that reviews should are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

5.6.2 **The Board will make sure:**

- DSLs have 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-trust approach to safeguarding and related policies.
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure.
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed.
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

5.6.3 The board of Directors working in collaboration with Trust HR will allocate an appropriate case manager in the event that an allegation of abuse is made against a headteacher

5.6.4 All Directors and local governors will read Keeping Children Safe in Education 2026 in its entirety.

5.6.5 Section 19 (of this policy) has information on how Directors and/or local governors are supported to fulfil their role.

### 5.7 Local Governing Bodies

5.7.1 Governors on Local Governing Bodies will review the school-specific elements of the policy after the trust level policy has been reviewed and approved.

5.7.2 They will also hold the headteacher to account for the implementation of the policy.

5.7.3 The Governing body will ensure all staff working with children read part one of KCSIE and those staff who do not work directly with children have read and understood Part one of KCSIE where they my access information about children or visit school sites.

5.7.4 We will appoint a member of each local governing body to act as the governor responsible for safeguarding, to liaise with the school DSL on local safeguarding issues and report to the safeguarding trustee.

In the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3) the Trust will appoint a suitable person to act as investigator/case manager.

### 5.8 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, they may wish to collaborate with the Head of safeguarding and DSL on this. All low level concerns to be reported to the Head of Safeguarding.
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person.
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

### 5.9 Virtual School Heads

5.9.1 Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

5.9.2 They also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

5.9.3 VSHs should also identify and engage with key professionals, e.g. DSLs, special educational needs coordinators (SENCOs), social workers, mental health leads and others.

## 6.0 Confidentiality

6.1 Please refer to our GDPR Policy, available on the Central SharePoint under references ADM03 GDPR Policy or trust website; Policies - St Teresa of Calcutta – Catholic Academy Trust under Data Protection Policies. We advise not to download or store local copies of this document, as it is subject to updates in line with GDPR legislation and Trust policies. The latest version will always be available on SharePoint.

### 6.2 Information Sharing

6.2.1 Information sharing decisions should be timely, necessary, proportionate, relevant, accurate, secure and, where possible, properly recorded together with the rationale for the decision made.

6.2.2 Saint Gregory's recognises that timely, lawful and proportionate information sharing is essential to safeguarding and promoting the welfare of children. Information will be shared with appropriate professionals where it is necessary to protect a child, support decision making or enables effective multi-agency working. The school maintains clear arrangements, setting out the processes and principles for sharing safeguarding information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Concerns should never be withheld because of uncertainty about information sharing where there is a safeguarding concern.

- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purpose of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

### 6.3 The DSL should consider that:

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

### 6.4 Regarding anonymity, all staff will:

- All staff should understand that effective safeguarding depends upon appropriate information sharing and should share safeguarding concerns promptly with the DSL. Staff should never assume that another person has passed on information.

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
    - The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
    - If staff are in any doubt about sharing information (including personal information), they should speak to the DSL (or deputy)
    - Confidentiality is also addressed in this policy with respect to record-keeping in section 18, and allegations of abuse against staff in appendix 3.

## 7.0 Recognising Abuse and Taking Action

Staff will understand and apply the distinction between:

- **Universal and community based early help** – Support provided at the earliest stage to prevent escalation
- **Targeted Family Help** -coordinated multi-agency intervention where needs are more complex.
- **The Families First Partnership (FFP) Programme Guide** provides a toolkit to assist safeguarding partners set up effective Family Help models. Family Help means both targeted early help and support and services delivered under s.17 of the Children Act 1989.

Staff will be aware of:

- Local threshold documents:
- Family help assessment
- Targeted family help
- The criteria for escalation to
    - Section 17 (Children in Need)
    - Section 47 (Child Protection)
    - Section 20
    - *Section 31*

The school will ensure:

- Decisions are professionally reasoned and clearly recorded
- Escalation is undertaken without delay where required
- Safety planning is considered and implemented as appropriate
- Relevant and appropriate staff members will be trained on the recommended evidence-based intervention and de-escalation techniques

7.1 All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for family help/referral for a child who:

- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care plan)

- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime, carrying weapons, threats involving weapons
- Is frequently missing/goes missing from education, care, or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of or has been permanently excluded.
- Have a medical conditions and who may benefit from family help where their medical needs are impacting on their welfare, education, attendance, emotional wellbeing or family circumstances.
- Maybe experiencing mental health difficulties and may require additional safeguarding support, family help or referral to appropriate services. Mental health needs should always be considered alongside any wider safeguarding concerns.

7.1.1 Staff, volunteers, directors and local governors must follow the procedures set out below in the event of a safeguarding issue.

7.1.2 Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

### 7.1.3 Local Authority Referral Procedures

### 7.2 If a Child is Suffering or Likely to Suffer Harm, or in Immediate Danger, the DSL must:

- Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

- Tell the DSL as soon as possible **if you make a referral directly**.

- The GOV.UK webpage for reporting child abuse to your local council: https://www.bolton.gov.uk/safeguarding-protecting-children/reporting-child-abuse/1

### 7.3 If a Child Makes a Disclosure to You

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

7.3.2 Bear in mind that some children may:

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

7.3.3 None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

### 7.4 If You Discover That FGM Has Taken Place or a Pupil is at Risk of FGM

7.4.1 Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

7.4.2 FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

7.4.3 Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

7.4.4 **Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

7.4.5 Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

7.4.6 Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

7.4.7 **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 and follow our local safeguarding procedures.

7.4.8 The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

7.4.9 **Any member of staff** who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow your local safeguarding procedures.

Action Required: A standard multi-agency safeguarding referral must be made to Bolton Children's Social Care immediately.

Consent: Do not seek consent from the family before making this referral, as doing so may increase the imminent risk to the child.

Legal Protections: If required, authorities can apply to the courts for an FGM Protection Order to legally prevent the child from being subjected to the practice or taken out of the UK.

**7.5** 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)**

7.5.1 Figure 1 below, after section 7.9, illustrates the procedure to follow if you have any concerns about a child's welfare.

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

7.5.3 If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

7.5.4 Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

**7.6 Family Help Assessment**

7.6.1 If a Family assessment help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in a family help assessment, in some cases acting as the lead practitioner.

7.6.2 The DSL will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

7.6.3 The DSL will keep the case under constant review, and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

7.6.4 Core Procedures and Steps

Consent: The early help process is completely voluntary and requires the family's agreement, which can be withdrawn at any time.

Initiation: Any agency working with the family (such as teachers, health visitors, or voluntary services) can initiate an Early Help Assessment at the earliest opportunity.

Submission: Practitioners must verify no active assessment exists via email, submit demographics within 48 hours for a blank template, and email completed documents or enquiries to BoltonISA@bolton.gov.uk.

Lead Professional: A single, familiar worker is assigned as a main contact to coordinate multi-agency support and Team Around the Family (TAF) meetings.

Review Timescales: Progress is formally reviewed with the family and child every 8 to 10 weeks to decide whether to continue, adjust, or close the support plan.

Escalation to Statutory Care: If needs are severe enough to meet the threshold for statutory intervention (such as a Child in Need or Child Protection plan), a social worker carries out a formal Children and Family Assessment over a maximum of 45 working days.

## 7.7 Referral

7.7.1 If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. Any referral made to Local authority children's social care, should be recorded as per Trust procedures and requirements. Trust Head of Safeguarding should be informed of all referrals to Police or LADO.

7.7.2 If you make a referral directly you must tell the DSL as soon as possible.

7.7.3 The local authority should make a decision within 1 working day of a referral about what course of action to take and should let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

7.7.4 If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

7.7.5 **Core Procedures and Steps**

Consent: The early help process is completely voluntary and requires the family's agreement, which can be withdrawn at any time.

Initiation: Any agency working with the family (such as teachers, health visitors, or voluntary services) can initiate an Early Help Assessment at the earliest opportunity.

Submission: Practitioners must verify no active assessment exists via email, submit demographics within 48 hours for a blank template, and email completed documents or enquiries to BoltonISA@bolton.gov.uk.

Lead Professional: A single, familiar worker is assigned as a main contact to coordinate multi-agency support and Team Around the Family (TAF) meetings.

Review Timescales: Progress is formally reviewed with the family and child every 8 to 10 weeks to decide whether to continue, adjust, or close the support plan.

Escalation to Statutory Care: If needs are severe enough to meet the threshold for statutory intervention (such as a Child in Need or Child Protection plan), a social worker carries out a formal Children and Family Assessment over a maximum of 45 working days.

## 7.8 If You Have Concerns About Extremism

7.8.1 If a child is not suffering or likely to suffer from harm, or in immediate danger, where it is possible speak to the DSL first to agree a course of action.

7.8.2 If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if

appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

7.8.3 Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

7.8.4 The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and local governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

### 7.9 If You Have a Concern About Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

7.9.1 All staff should be aware that mental health concerns may, in some cases, constitute a safeguarding concern.

7.9.2 This includes, but is not limited to:

- Self-harm
- Suicidal ideation
- Trauma responses
- Behaviour linked to abuse, neglect or exploitation

**Staff must:**

- Recognise early indicators of mental health need
- Understand that mental health may be both a cause and consequence of safeguarding risk
- Report concerns in line with this policy
- Work with the DSL to ensure appropriate support and referral pathways are in place

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

7.9.4 Staff should recognise the early signs of mental health difficulties, understand that only appropriately trained professionals should attempt to diagnose mental health conditions, and report concerns promptly where a child's mental health may indicate or constitute a safeguarding concern.

7.9.5 If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.5 (See figure 1 below).

7.9.6 If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option

7.9.7 In an emergency situation, call 999, your local crisis team, or access CAMHS urgent response pathway.

7.9.8 If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree to a course of action.

### 7.9.9 Key Referral Routes & Procedures

Low-Level / Early Help (IThrive Hub):

- For emotional wellbeing, navigation, and early support for ages 5–19 (up to 25 with SEND) registered with a Bolton GP.
- Requires consent and involvement from the child or family.
- Requests can be sent via Bolton Together IThrive Referrals or emailed to IThrive@boltontogether.org.uk.

School-Based Mental Health Support Teams (MHST):

- For evidence-based interventions delivered in schools, online via MS Teams, or at CAMHS.
- Referrals must be made through the designated mental health lead at the child or young person's school.

Specialist Mental Health (Bolton CAMHS):

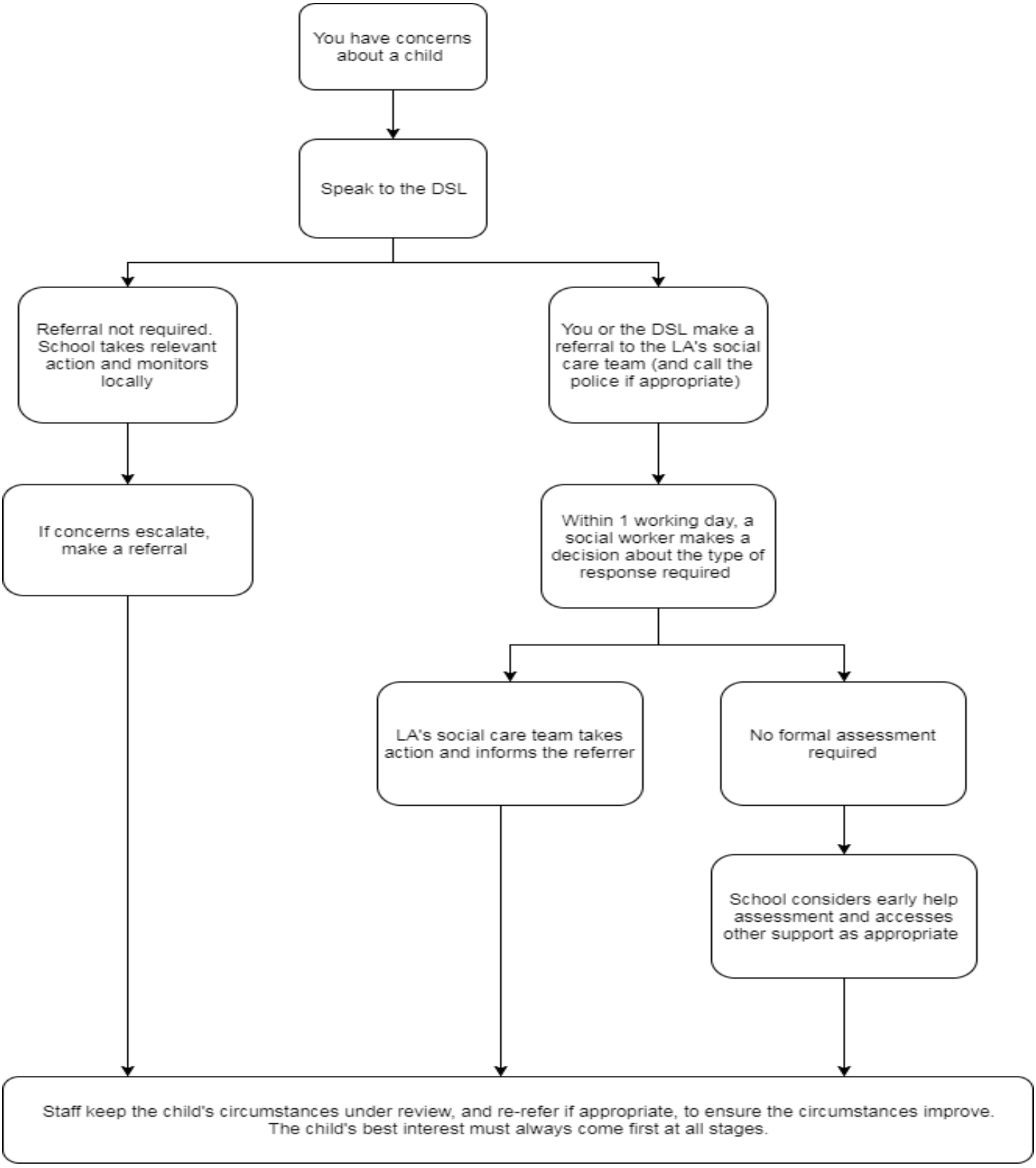
- For moderate-to-severe mental health difficulties, eating disorders, or neurodevelopmental pathways (Autism/ADHD) for ages 5–18 registered with a Bolton GP.
- Professional referrals and clinical criteria details are submitted directly via the GMMH Bolton CAMHS portal. Referrals should detail symptom duration, day-to-day impact, and risk factors (self-harm or aggression).

Urgent & Crisis Support:

- If there is an immediate safety risk or mental health crisis, contact Bolton's 24/7 mental health crisis line at 0800 953 0285 or text SHOUT to 85258. Safeguarding concerns must go to social care via the Integrated Front Door.

**Figure 1: Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action. See section 7.2 for what to do.)



### 7.10 Concerns about a Staff Member, Supply Teacher, Volunteer or Contractor

7.10.1 If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the [head-teacher/head of school] or if the Head-teacher is unavailable contact the Trust Head of Safeguarding as soon as possible.

7.10.2 If the concerns/allegations are about the [headteacher/head of school,) report to the Trust Head of Safeguarding who will follow the Trust reporting procedures.

7.10.3 The [headteacher/head of school) or Head of Safeguarding (depending on the subject of the allegation) will then follow the procedures set out in appendix 3, as appropriate.

7.10.4 Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the [headteacher/head of school], report it directly to the local authority designated officer (LADO) and the Trust Head of Safeguarding.

7.10.5 The school will deal promptly with any allegation raised regarding a supply teacher to ensure this is dealt with properly. All safeguarding concerns/allegations must be referred to the Trust Head of Safeguarding/Safeguarding Manager. Employment concerns must be referred to Trust HR, in the first instance, to ensure Trust procedures are carried out.

7.10.6 If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO and Trust Head of Safeguarding, as you would with any safeguarding allegation.

7.10.7 Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

### 7.11 Allegations of Abuse Made Against Other Pupils

7.11.1 We recognise that children are capable of abusing their peers. Abuse **will never** be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

7.11.2 All child-on-child abuse is unacceptable and will be taken seriously.

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

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

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

### 7.12 Procedures for Dealing with Allegations of Child-on-child Abuse

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

- You must record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

7.12.2 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 protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

School record all incidents of child-on-child abuse on Cpoms and are investigated thoroughly. Appropriate action is then taken and support given to the victims.

### 7.13 Creating a Supportive Environment in School, Minimising the Risk of Child-on-child Abuse

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

7.13.2 To achieve this, we will:

- Challenge any form of derogatory or Sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, Sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems.
- Ensure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here."
- If they have any concerns about a child's welfare, they should act on them immediately rather than waiting to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report.
  - A member of staff may overhear a conversation.
  - A child's behaviour might indicate that something is wrong.

- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.
- Child-on-child abuse can also include abuse facilitated through technology, including:
  - Sharing of real or AI-generated sexual imagery
  - Deep-fake imagery
  - Online misogyny and harmful sexual behaviour

The School recognises that misogyny and gender-based harm form part of harmful sexual behaviour and will be addressed accordingly.

7.13.3 The DSL will take the lead role in any disciplining of the alleged perpetrator(s), where needed. The Trust, alongside Trust HR, will provide support at the same time as taking any disciplinary action.

7.13.4 Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent school from coming to its own conclusion about what happened and imposing a penalty accordingly. School will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this.
- There are circumstances that make it unreasonable or irrational to reach a view about what happened while an independent investigation is ongoing.
- School will work with Trust HR during this process.

### 7.14 Sharing of Nudes and Semi-nudes

7.14.1 Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non- consensual.

7.14.2 Based on guidance from the UK Council for Internet Safety and Department of Science, Innovation and Technology for all staff and for DSLs and senior leaders.

### 7.15 Your responsibilities when responding to an incident:

7.15.1 If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are AI-generated images that otherwise appear to be a photograph or video you must report it to the DSL immediately.

7.15.2 You must **not**:

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

### 7.16 Initial Review Meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or local authority children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

7.16.2 The DSL will make an immediate referral to police and/or local authority children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents.

- 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 their SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

### 7.17 Further Review by the DSL

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

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

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

### 7.18 Informing Parents/Carers

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

### 7.19 Referring to the Police

7.19.1 If it is necessary to refer an incident to the police, this will be done through 101.

### 7.20 Recording Incidents

7.20.1 All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

### 7.21 Curriculum Coverage

7.21.1 Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships education/relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
  - Specific requests or pressure to provide (or forward) such images.

- The receipt of such images

7.21.2 The procedures to be followed on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

7.21.3 Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scaremongering
- Challenging victim-blaming attitudes.

### 7.22 Reporting Systems for our Pupils

7.22.1 The school will ensure there are well-promoted, easily understood and easily accessible systems through which pupils can raise safeguarding concerns, worries or disclosures. Pupils will be regularly reminded of how to access support and who they can speak to if they are worried about themselves or another child. All concerns raised by pupils will be taken seriously, responded to appropriately and acted upon in accordance with this policy.

7.22.2 Staff should maintain an attitude of "it could happen here" and ensure pupils feel heard, valued and respected when raising concerns.

Additional support will be provided for pupils who may find it more difficult to communicate their worries, including younger children, pupils with SEND, pupils with communication needs and pupils who are vulnerable to exploitation and abuse.

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

7.22.4 We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

7.22.5 To achieve this, we will:

- Put systems in place for pupils to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- Pupil's are made aware of the reporting systems and processes, e.g. through discussion in your relationships/sex education curriculum

## 8.0 Online Safety and the Use of Mobile Technology

8.1 The school recognises the safeguarding risks associated with emerging technologies, including artificial intelligence.

8.1.1 These risks may include:

- AI-generated explicit imagery, including "deepfake" content

- Misinformation and Disinformation
- AI-assisted grooming or exploitation

**8.2 These risks are recognised as potential forms of child-on-child abuse and harmful sexual behaviour.**

8.2.1 Schools will:

- Ensure filtering and monitoring systems consider emerging risks including AI
- Review the effectiveness of filtering and monitoring systems at least annually
- Maintain records of these reviews
- Ensure staff are trained to recognise and respond to emerging online risks
- Have robust processes in place (including filtering and monitoring) to ensure the online safety of pupils, staff, volunteers and governors.

8.3 Our Acceptable Use and Device Managements detail our approach in this regard. These are accessible to staff on the central Policy Hub, alternatively these can be requested from admin@stoccat.org.uk

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

## 9.0 Mobile Phone Safety

9.1 As a school, we recognize the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

9.2 To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school is a mobile phone-free environment by default
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### 9.3 Online Safety – Governance Requirements

The school adopts a whole-school approach to online safety, addressing risks across the four categories

#### 9.3.1 The 4 Key Categories of Risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **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

9.3.2 **The school will:**

- Ensure all staff understand cyber security risks, including cyber crime
- Provide regular updates to parents and carers on online safety risks and protection

9.3.3 **The Governing body will**:

- Undertake an annual review of filtering and monitoring systems
- Ensure records are kept of all monitoring and review activity
- Be assured that systems are:
  - Effective
  - Regularly tested
  - Responsive to emerging risks (including AI-generated harms)

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

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including the risks of online radicalisation, and their expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regard to the use of their mobile phone and cameras, for example:
  - Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present.
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Carry out an annual review of our filtering and monitoring effectiveness. This will be conducted by R Ashcroft with the support of our DDSL and IT support.
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises St. Gregory's approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our school website.

### 9.4 Artificial Intelligence (AI)

9.4.1 Images may be digitally altered or wholly generated using artificial intelligence, including deepfakes and deep nudes.

9.4.2 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 Gemini.

9.4.3 Saint Gregory's recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

9.4.4 Saint Gregory's will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying, behaviour and artificial intelligence policies.

9.4.5 Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

## 10.0 Notifying Parents or Carers

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

10.2 Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

10.3 If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

10.4 In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

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

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

## 11.0 Pupils with Special Educational Needs, Disabilities or Health Issues

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

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

11.2 We offer extra pastoral support for these pupils. This includes:

11.3 Support from our school's Learning Mentor, nurture and support from class teachers and teaching assistants.

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

## 12.0 Children with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners. Having a medical condition does not, in itself, indicate that a child is at greater risk of harm. However, some children with medical conditions may have additional safeguarding needs or vulnerabilities. Staff should be alert to the impact that a child's medical condition may have on their physical health, emotional wellbeing, attendance, participation, communication or ability to recognise or report abuse, and ensure concerns are shared promptly and appropriately with the DSL.

## 13.0 Pupils with a Social Worker

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

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

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

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

## 14.0 Young Carers, Looked-after and Previously Looked-after Children

14.1 Young carers are children under the age of 18 who provide, or intend to provide, care of another person. Caring responsibilities can have a significant impact on a child's education, attendance, emotional wellbeing, physical health and social development. Staff should remain professionally curious where a child may have caring responsibilities and consider where family help or additional support is required.

14.2 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 is looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL has details of local authority children's social workers and relevant virtual school heads.

14.3 The school has appointed a designated teacher, R Ashcroft, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

14.5 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.

## 15.0 Pupils who are Lesbian, Gay, Bisexual

15.1 School recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual (LGBTQ+) is not in itself a risk factor for harm. However, pupils who are or (who are perceived to be by other children to be) can be targeted by other children. See the school's behaviour policy on the school website: https://www.stgregorys.stoccat.org.uk/

15.2 School also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL. Children are given support from the school's lLearning Mentor when needed.

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

## 16.0 Pupils who are questioning their Gender

### 16.1 Supporting pupils who are questioning their gender

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

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

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

The DSL will lead in these cases.

### 16.2 Involving parents/carers in cases of pupils questioning their gender

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

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

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

### 16.3 Considering requests for support with social transition

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

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

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

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes

- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

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

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

### 16.4 Rules on single-sex spaces

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

### 16.5 Rules on single-sex sports

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

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

## 17.0 Complaints and Concerns about School Safeguarding Policies

### 17.1 Complaints Against Staff

17.1.1 Complaints against staff that are likely to 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).

### 17.2 Other Complaint

17.2.1 Please see the Trust Complaints Policy for guidance on how to raise wider complaints; ADM02 Complaints Policy

### 17.3 Whistleblowing

17.3.1 Please refer to the Whistle Blowing Policy available on the Central SharePoint, under reference HR11 Whistleblowing Policy, we advise not to download or store local copies of this document, as it may be updated in line with GDPR legislation and Trust policies. The most recent version will always be available on the Trust website; Policies - St Teresa of Calcutta – Catholic Academy Trust under Administration and Governance Policies.

## 18.0 Record-keeping

18.1 All safeguarding concerns, discussions, decisions made and the rationale for those decisions must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL. The DSL can discuss with the Trust Head of Safeguarding.

18.2 *All safeguarding concerns must be:*

- *Recorded accurately*
- *Stored securely*
- *Shared appropriately*
- 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.

18.3 Concerns and referrals will be kept in a separate child protection file for each child.

18.4 Where a child transfers to another education setting, the DSL will consider what additional safeguarding information should be shared with the receiving setting, where it is relevant to safeguarding or indicates that the child may present a risk to themselves or others, including serious violence, harmful sexual behaviour or other significant safeguarding concerns, in accordance with data protection legislation and statutory guidance. Safeguarding records will:

- Capable of scrutiny and professional challenge
- Include:
  - The concern
  - Action taken
  - Decision making rationale
  - Outcomes

Records will be:

- Retained in line with statutory guidance
- Transferred securely when pupils move schools
- Kept confidential and stored securely

18.5 Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

18.6 Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

18.7 If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file.

18.8 To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

18.9 In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

18.10 In addition:

- 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.

### 18.11 Local Record-keeping Arrangements

- Records are kept electronically
- School use Cpoms to record all safeguarding concerns
- Records are kept secure and retained in line with the STOCCAT Trust policy.

Bolton's Local Record Keeping Arrangements are as follow:

1. Digital Record Keeping & Storage

- The CPOMS System: Many local schools (such as The Oaks Primary and Clarendon Primary) utilize CPOMS (Child Protection Online Management System) to log all safeguarding concerns, actions, discussions, and decisions.
- Separation of Files: Child protection records are kept strictly confidential and stored separately from a student's regular academic profile.
- Retention Periods: Safeguarding files are legally retained by the child's last educational setting until their 25th birthday (or up to 75 years if the child was ever Looked After / in care).

2. Information Sharing & School Transfers

When a pupil moves to a new educational setting, strict timelines apply to prevent gaps in oversight:

- The 5-Day Rule: The Designated Safeguarding Lead (DSL) must securely transfer the child's protection files to the new school or college within five days of an in-year transfer or within the first five days of a new term.
- Chain of Custody: These files are sent independently of the main academic folder. Schools use a standardized "Transferring of Safeguarding Information" checklist and require a signed receipt from the receiving school to confirm safe delivery.

3. Multi-Agency Information Sharing

Bolton schools operate alongside local emergency services, social care, and the council via structured avenues:

- Operation Encompass - A statutory police-to-school partnership. Greater Manchester Police send secure, confidential morning notifications directly to a school's trained "Key Adult" if a student (ages 4–17) witnessed or was present during a domestic abuse incident overnight. This lets schools implement immediate, low-level support.
- Strategy Meetings & Conferences - When a formal investigation is open, staff attend Child Protection Strategy Meetings and multi-agency conferences. They share information dynamically with health providers, law enforcement, and child protective services.
- Bolton Council Queries - External professionals or Bolton Children's Services requesting data must submit formal information sharing requests, which are processed on a case-by-case basis within 5 working days.

4. GDPR, Consent, and Parents

- Under the Data Protection Act 2018 and GDPR, schools do not require parental consent to share information if a child is deemed at risk of harm or neglect. However, as a matter of standard partnership, schools aim to share information transparently with parents/carers before strategy meetings or multi-agency panels whenever it is safe to do so

## 19.0 Training

### All Staff

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

19.1.2 This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole trust safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the 3 safeguarding partners.
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- 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.

19.1.3 All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism and to challenge extremist ideas.

19.1.4 All staff will be required to undertake annual safeguarding training appropriate to their role and responsibilities. Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

19.1.5 Relevant and appropriate staff members will be required to undertake recommended evidence-based intervention and de-escalation techniques training

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

19.1.7 Volunteers will receive appropriate training, as required.

### 19.2 The DSL and Deputies

19.2.1 The DSL and deputies will undertake DSL specific child protection and safeguarding training at least every 2 years.

19.2.2 In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs by attendance at Local Authority Network meetings, Trust network meetings, or taking time to read and digest safeguarding developments).

19.2.3 They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

### 19.3 Directors and local governors

19.3.1 All directors and local governors receive training about safeguarding and child protection (including online safety) at induction and on annual basis thereafter which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

### 19.4 Recruitment – interview panels

19.4.1 At least 1 person conducting any interview for any post at the school/trust will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

19.4.2 See appendix 2 of this policy for more information about our safer recruitment procedures.

### 19.5 Staff who have contact with pupils and families

19.5.1 All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## 20.0 Monitoring Arrangements

This policy will be reviewed annually by The Trust Head of Safeguarding in conjunction with the relevant Heads of Service and approved by Board of Directors. At every review, it will be approved by the full board of directors and the locally set sections then reviewed by the local governing body and headteacher.

## 21.0 Links with Other Policies

21.1 This policy links to the following policies and procedures:

- Behaviour
- Complaints
- Health and safety
- Attendance
- Online safety
- AI
- Mobile phone use
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children.
- Privacy notices
- Whistleblowing
- Central Child Protection Policy
- Medicine Administration Policy
- Allergen Policy
- Digital Safeguarding
- Fire Policy
- Incident Response Policy
- Mental Health and Wellbeing Policy
- Physical Intervention Policy
- Social Media Policy
- Violence and Aggression Policy

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

## Appendix 1: Types of Abuse

**Abuse**, is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

**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.
- Persistent verbal abuse, belittling, humiliation or degrading comments, criticism, intimidation, rejection, manipulation or name calling that undermines a child's self-worth, confidence, or emotional wellbeing.
- 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.
- Verbal abuse such as criticism, belittling, or name calling.

**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 via the internet)

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

Sexual abuse can take place online and technology can be used to facilitate offline abuse.

**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 caregivers)
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

# Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures

## 1.0 Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

## 2.0 Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

## 3.0 Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

## 4.0 Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
    - If they are known to the policy and children's local authority social care and
    - If they have been disqualified from providing childcare
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

## 5.0 Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept references from a family member
    - Not accept open references (for example, "To whom it may concern")
    - Not rely on applicants to obtain their reference
    - Liaise directly with referees and verify any information contained within references with the referees
    - Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
    - Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
    - Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. If the applicant has never worked with children, then ensure a reference is from their current employer, training provider or education setting.
    - Ensure electronic references originate from a legitimate source
    - Contact referees to clarify where information is vague or insufficient information is provided
    - Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed
    - Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
    - Resolve any concerns before any appointment is confirmed

## 6.0 Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

## 7.0 Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

## 8.0 New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check:
  - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
  - Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: criminal records checks for overseas applicants
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

*Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

- Responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or
- Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once

The above applies to both paid staff and volunteers.

## 9.0 Existing staff and volunteers

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

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

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

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

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

## 10.0 Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

## 11.0 Contractors

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

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

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

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

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

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

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

## 12.0 Trainee/student teachers

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## 13.0 Volunteers

We will:

- Never allow an unchecked volunteer to work in regulated activity, or leave them unsupervised
- Obtain references for volunteers before they are recruited.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

## 14.0 Governors

All governors. All Trustees, local governors and members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.
- Identity

- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

## 15.0 Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### 16.0 Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### 17.0 Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

## Appendix 3: Allegations of Abuse Made Against Staff

### Allegations Against Staff (Including Low-level Concerns) Policy

### 1.0 Allegations that may Meet the Harm Threshold

1.1 This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.

1.2 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 he or she 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.

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

1.4 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.

1.5 An appropriate senior colleague will be appointed 'case manager'. This will be the [headteacher / head of school], or the Trust Head of Safeguarding or Performance Officer where the [headteacher / head of school] is the subject of the allegation.

1.6 Our procedures for dealing with allegations will be applied with common sense and judgement.

### 2.0 Suspension of the Accused Until the Case is Resolved

2.1 Suspension of the accused will not be the default position and will only be considered as a last resort, 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.

2.2 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.

2.3 Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the trust.

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

## 3.0 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.

## 4.0 Procedure for Dealing with Allegations

4.1 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.
- I inform the designated officer at the local authority of the allegation and discuss. 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 local authority 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 local authority children's social care services, where necessary). Where the police and/or local authority 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 local authority 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 local authority children's social care.
- **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 local authority 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 can be sought from trade union representatives or a colleague. Where welfare or counselling or medical advice is required, the trust will support these arrangements.
- 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 local authority 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)
- 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.

4.2 For early years provision: we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

4.3 If the trust 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.

4.4 Where the police are involved, wherever possible the trust 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.

## 5.0 Additional Considerations for Supply Teachers and all Contracted Staff

5.1 If there are concerns or an allegation is made against someone not directly employed by the trust, 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 Headteacher will take advice from the Trust Head of Safeguarding and Trust Head of HR to determine whether it is appropriate for the individual to remain in school/trust. The Headteacher will discuss the feasibility of continued employment with the third-party agency while the investigation is undertaken.
- We will involve the agency fully, but the school/trust 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)

5.2 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.

## 6.0 Specific Actions

### 6.1 Action following a Criminal Investigation or Prosecution

6.1.1 The case manager will keep the local authority's designated officer informed of any further action, including disciplinary action, taking into account information provided by the police and/or local authority children's social care services.

### 6.2 Conclusion of a Case Where the Allegation is Substantiated

6.2.1 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 trust will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

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

### 6.3 Individuals Returning to Work After Suspension

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

6.3.2 The case manager/line 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.

### 6.4 Unsubstantiated, Unfounded, False or Malicious Reports

6.4.1 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 local authority 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.

### 6.5 Unsubstantiated, Unfounded, False or Malicious Allegations

6.5.1 If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the case manager with support from the LADO will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to local authority 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.

### 6.6 Confidentiality

6.6.1 The trust will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

6.6.2 The case manager will take advice from the LADO, police and local authority 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.

### 6.7 Record-keeping

6.7.1 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.

6.7.2 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).

6.7.3 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.

6.7.4 In these cases, the school will provide a copy to the individual, in agreement with local authority, 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.

### 6.8 References

The school will ensure:

- Only substantiated safeguarding concerns are included in references
- False or malicious allegations are removed from personnel record

6.8.1 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.

### 6.9 Learning Lessons

6.9.1 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 trust's procedures or practice to help prevent similar events in the future.

6.9.2 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.

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

### 6.10 Non-recent Allegations

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

6.10.2 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.

6.10.3 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.

## 7.0 Section 2: Low-Level Concerns

7.1 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.

7.2 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

7.3 The school maintains an open and transparent culture in which all concerns about staff behaviour are shared appropriately.

## 8.0 Definition of Low-level Concerns

8.1 Low -level concerns are defined as behaviour that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- Does not meet the harm threshold but may indicate emerging risk

8.2 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.

The school will ensure:

- All low-level concerns are recorded
- Records are reviewed to identify patterns or trends over time
- Staff are actively encouraged to self-report concerns
- Concerns are addressed proportionately and promptly

School leaders will:

- Maintain oversight of themes and trends
- Use information to strengthen safeguarding culture and practice
- Ensure appropriate action is taken where cumulative concerns indicate increased risk

## 9.0 Sharing Low-level Concerns

9.1 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.

9.2 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.
- Empower staff to share any low-level concerns.
- 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 or trust's safeguarding system.

## 10.0 Responding to Low-level Concerns

10.1 If the concern is raised via a third party, the headteacher will first inform the Trust Head of Safeguarding of the concern and then 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

10.2 The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the relevant staff policies. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL. Head of Safeguarding will be kept informed throughout the process till conclusion.

## 11.0 Record Keeping

11.1 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.

11.2 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
- Retained at least until the individual has left employment at the school.

11.3 Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## 12.0 References

12.1 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 4: Specific Safeguarding Issues

## 1.0 Assessing Adult-involved Nude and Semi-nude Sharing Incidents

This section is based on Part one of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

## 2.0 Sexually Motivated Incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from children and young people using online platforms.

To make initial contact, the offender may present as themselves or use a false identify on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chat rooms or on gaming platforms and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person.
- Quickly engaged in sexually explicit communications which may include the offender sharing unsolicited images.
- Moved from a public to a private/E2EE platform.
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes.
- Offered something of value such as money or gaming credits.
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images.

## 3.0 Financially Motivated Incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated, organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them.
- Use images that have been stolen from the child or young person taken through hacking their account.
- Use digitally manipulated images, including AI-generated images, of the child or young person.

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person.
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first.
- Moved from a public to a private/E2EE platform.
- Pressured into taking nudes or semi-nudes.
- Told they have been hacked, and they have access to their images, personal information and contacts.
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

## 4.0 Children Missing from Education

A child being absent from education for prolonged periods and/or on repeat occasions 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 Traveler families.
- Come from the families of service personnel.
- Go missing or running away from home or care.
- Are supervised by the youth justice system.
- Cease attending school.
- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation 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 missing, 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.

## 5.0 Child Criminal Exploitation

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

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

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

Indicators of CCE can include a child:

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

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

## 6.0 Child Sexual Exploitation

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

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

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

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. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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.

## 7.0 Child-on-child Abuse (Including harassment and violence)

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

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

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 peers (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)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- 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 including those generated using AI
- Upskirting, which is a criminal offence, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or if a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. Staff must report concerns regarding a pupils exposure to misogynistic or misandrist content, influencers or online communities to the DSL.

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.

## 8.0 Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse and stalking)) 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. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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.

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

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

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

The school will ensure appropriate arrangements are in place to receive and respond to information shared by Police regarding domestic abuse incidents (e.g. Operation Encompass).

This includes:

- Considering the child's voice
- Identifying immediate safeguarding needs
- Providing appropriate pastoral and emotional support

## 9.0 Homelessness

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

The DSL and DDSL's will be aware of contact details and referral routes into 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 local authority children's social care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

## 10.0 So-called 'Honour-Based' Abuse (including FGM and Forced Marriage)

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

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

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

## 11.0 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 7.4 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 practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced 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.

## 12.0 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 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one 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 fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

## 13.0 Preventing Radicalisation

**Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence

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

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people.
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system.

The use or threat 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 becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll 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 from becoming involved with or supporting 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. 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 the 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 social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to, 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 7.8 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, including behaviour policy, curriculum policies and online safety.

## 14.0 Harmful Sexual Behaviour, Sexual Violence and Sexual Harassment Between Children in Schools

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

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

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

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

HSB can occur:

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

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience 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 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 and bisexual children, or children questioning their gender are at greater risk. It is more likely that girls will be victims and boys will be perpetrators.

Staff should be aware of the importance of:

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

If staff have any concerns about HSB, 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 7.12 set out more detail about our school's approach to this type of abuse

### 15.0 Serious Violence

Serious violence is a continuing safeguarding concern which may involve:

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

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

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

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

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

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

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

The DSL will:

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

## 16.0 Checking the Identity and Suitability of Visitors

Please review our Visitors Policy (Ref ADM05) on Trust Policy hub, or please request via admin@stoccat.org.uk

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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 must sign in on entering the school internal premises using the InVentry system and wear the assigned visitor's badge/lanyard provided.

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.

Where a visitor will have no contact with children, it is unlikely that a DBS will be required

## 17.0 Non-collection of Children

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

- Telephone all emergency contacts listed in school and leave a voicemail where possible.
- If I child has not been collected after 60 minutes, school will ring the police.
- For children with a social worker, social workers would be contacted.

## 18.0 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:

- Telephone the police
- Inform parents
- Report incident to the Trust and local authority.
- The incident would be recorded on Cpoms.