



Policy: Safeguarding and Child Protection Policy

Contents

Statement of intent

Acronyms

1. Definitions
2. Legal framework
3. Roles and responsibilities
4. Multi-agency working
5. Abuse and neglect
6. Domestic abuse
7. FGM
8. Forced Marriage
9. Virginity testing and hymenoplasty
10. Child sexual exploitation (CSE)
11. Child Criminal Exploitation (CCE)
12. Mental Health
13. Homelessness
14. County Lines
15. Serious violence
16. Pupils with family members in prison
17. Pupils required to give evidence in court
18. Contextual Safeguarding
19. Preventing Radicalisation
20. Child absent from education
21. Child abduction and community safety incidents
22. Modern Slavery
23. Pupils potentially at greater risk of harm
24. Alternative provision
25. Work experience
26. Homestay exchange visits
27. Private fostering
28. Concerns about a pupil
29. Early Help including Operation Encompass
30. Managing referrals
31. Concerns about staff and safeguarding practices
32. Allegations of abuse against staff
33. Child – on- Child abuse
34. Consensual and non-consensual sharing of indecent images and videos
35. Adult involved in Youth produced sexual- imagery
36. Communication and confidentiality
37. Online Safety

38. Cyber - crime
39. Personal Electronic Devices
40. Sports clubs, extracurricular activities and use of school premises for non-school activities
41. Safer recruitment
42. Single central record (SCR)
43. Training
44. Monitoring and review

Appendices

- A. Safeguarding Reporting Process
- B. Contacts and Advice
- C. Staff Disqualification Declaration

Statement of intent

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

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

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

The school's Designated Safeguarding Lead is: Helen Charlesworth, Deputy Head.

In the absence of the Designated Safeguarding Lead, child protection matters will be dealt with by: Louise Stubbs, Deputy Designated Safeguarding Lead and Senior Year Leader.

Acronyms

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

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
DDSL	Deputy Designated Safeguarding Lead	A member of staff trained to the same level as the DSL. They can carry out the same activities as the DSL however the ultimate lead responsibility for safeguarding and child protection remains with the DSL.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).

EHCP	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.

PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHEe	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENDCO	Special educational needs and disabilities coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior/strategic leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
UKHSA	UK Health Security Agency	Aims to protect the health of the nation from infectious diseases and other external threats to health. Replaced Public Health England in October 2021.
UKCIS	UK Council for Internet Safety	UKCIS is a collaborative forum through which government, the tech community and the third sector work together to ensure the UK is the safest place in the world to be online. It is part of the DfE, Home Office and the Department for Science, Innovation and Technology. Previously known as the UKCCIS.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

1. Definitions

- 1.1 The terms “**children**” and “**child**” refer to anyone under the age of 18.
- 1.2 For the purposes of this policy, “safeguarding and protecting the welfare of children” is defined as:
- Protecting pupils from maltreatment.
 - Preventing the impairment of pupils’ mental and physical health or development.
 - Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care.
 - Taking action to enable all pupils to have the best outcomes.
- 1.3 For the purposes of this policy, “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.
- 1.4 For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:
- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
 - **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
 - **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
 - **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- 1.5 For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:
- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
 - Sexual “jokes” and taunting.

- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

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

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

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

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

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

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

2. Legal framework

2.1 This policy has been created with due regard to all relevant legislation including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006

- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Equality Act 2010
- Apprenticeships, Children and Learning Act 2009
- The School Staffing (England) Regulations 2009
- Rehabilitation of Offenders Act 1974
- Education and Skills Act 2008
- Education Act 2002
- Human Rights Act 1998
- Amendments to the Exceptions Order 1975, 2013 and 2020
- Counter-Terrorism and Security Act 2015
- The General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Anti-social Behaviour, Crime and Policing Act 2014
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- DfE (2023) 'Keeping children safe in education 2023'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of Forced Marriage'
- HM Government (2023) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- DfE (2023) 'Working Together to Safeguard Children'
- DfE (2023) 'The Prevent duty: safeguarding learners vulnerable to radicalisation'
- Home Office (2023) Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2021) 'Staffing and employment advice for schools'
- DfE (2020) 'Governance handbook'
- DfE (2021) 'Basic check ID checking guidelines from 1 July 2021'
- Home office (2021) 'Right to work checks: employing EU, EEA and Swiss citizens'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2023) 'Recruit teachers from overseas'
- DfE (2021) 'Teachers' Standards'

- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2022) 'Working together to improve school attendance'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'
- National Police Chief's Council (2020) 'When to call the police: guidance for schools and colleges'.
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-agency guidance'

2.2 Other relevant school policies include:

- Allegations of Abuse Against Staff Policy
- Behaviour for Success Policy
- *Online Safety Policy**
- Wellbeing and Mental Health Policy for Pupils
- Corinium Education Trust Code of Conduct
- Exclusion Policy
- SEND Policy
- Whistleblowing Policy and Procedure
- Anti-Bullying Policy
- Designated Teacher Policy (Looked After Children and Previously Looked after Children) (LAC, Previously-LAC)
- IT Acceptable Use Policy
- Privacy Notice
- Data Protection Policy
- Remote learning Plan

**in the process of being written.*

3. Roles and responsibilities

3.1 All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil;
- Maintain an attitude of 'it could happen here' where safeguarding is concerned;
- Provide a safe environment in which pupils can learn;
- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation in relation to child-on-child abuse;
- Be prepared to identify pupils who may benefit from early help;
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction;
- Be aware of the role and identity of the DSL and deputy DSL;
- Undertake safeguarding training, including Prevent and online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated;
- Be alert to the risk factors of extremism and radicalisation and act proportionately;

- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually;
- Be aware of the local early help process and understand their role in it;
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments;
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child;
- Support social workers in making decisions about individual children, in collaboration with the DSL;
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected;
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful;
- Promote dialogue and understanding, and ensure all pupils feel listened to and understood;
- Empower pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm;
- Avoid victim-blaming attitudes, and challenge it in a professional way if it occurs;
- Maintain appropriate levels of confidentiality when dealing with individual cases;
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe;
- Speak to the DSL or Deputy DSL if they are unsure about how to handle safeguarding matters;
- Be aware of safeguarding issues that can put pupils at risk of harm;
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.

3.2 Teachers, including the headteacher, have a responsibility to safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards' including personally reporting any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

3.3 The Local Governing Body has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements;
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation;
- Ensure that keeping children safe and protected from harm, including child-on-child abuse and Prevent Duty, is central to all policies and procedures implemented across the school;
- Ensure that appropriate measures are in place to protect pupils from radicalisation;

- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times;
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children';
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures;
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures;
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions;
- Ensure that staff working directly with children read at least Part one of KCSIE;
- Ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE. **NB:** Individual schools assess which guidance will be most effective for their staff to safeguard and promote the welfare of children;
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children;
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements;
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development;
- Ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible;
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide;
- Ensure that staff members have due regard to relevant data protection principles which allow them to share (and withhold) personal information;
- Ensure that a member of the Local Governing Body is nominated to liaise with the trustees of the Corinium Education Trust, the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Headteacher or another member of the Local Governing Body;
- Guarantee that there are effective and appropriate child protection policies and procedures in place together with a Staff Code of Conduct;
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description;
- Appoint one or more deputy DSL(s) to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s);
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the Local Governing Body itself, the SLT and DSL;
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home) and child-on-child abuse,

through teaching and learning opportunities, as part of providing a broad and balanced curriculum;

- Adhere to statutory responsibilities by conducting preemployment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required;
- Ensure that staff members are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+;
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems;
- Guarantee that volunteers are appropriately supervised;
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training;
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually;
- Ensure that all Governors receive appropriate safeguarding and child protection training (including online safety) upon their induction and that this training is updated regularly in order to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust, whole-school approach to safeguarding – this training should include, amongst other things, the expectations and responsibilities on staff in relation to filtering and monitoring;
- Certify that there are procedures in place to handle allegations against members of staff, supply staff, volunteers and contractors;
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned;
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils;
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff;
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse;
- Make sure that pupils' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual pupils;
- Guarantee that there are systems in place for pupils to express their views and give feedback;
- Establish an Early Help procedure and ensure all staff understand the procedure and their role in it;
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training;
- Ensure that the designated teacher works with the virtual school head to discuss how the pupil premium funding can best be used to support LAC;

- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities;
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the pupil's legal status, contact details and care arrangements;
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future;
- Ensure that all members of the Local Governing Body have been subject to an enhanced DBS check;
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns;
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

3.4 The Headteacher has a duty to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession;
- Ensure that the policies and procedures adopted by the Local Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members;
- Ensure staff receive training on recognising indicators of abuse and handling disclosures or concerns about a pupil including Prevent training;
- Ensure pupils are taught about British values through the curriculum;
- Ensure visitors and speakers to the school are appropriate and vetted prior to them having access to pupils;
- Ensure the school is a safe space in which pupils can understand and discuss sensitive topics, including terrorism and extremism, and are able to challenge these ideas;
- Provide staff, upon induction, with the appropriate policies and information.

3.5 The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place;
- Provide advice and support to other staff on child welfare, safeguarding and child protection;
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so;
- Contribute to the assessment of children, and/or support other staff to do so;
- Understand and keep up-to-date with local safeguarding arrangements including having a clear understanding of Prevent reporting and referral processes;
- Act as the main point of contact with the three safeguarding partners and the child death review partner;
- Make the necessary child protection referrals to appropriate agencies;

- Understand when they should consider calling the police, in line with the National Police Chiefs' Council (NPCC) guidance ;
- Liaise with the Headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes;
- Act as a source of support for pupils who have been abused by, or who have abused, other pupils;
- Lead the school in taking a preventative approach to child-on-child abuse;
- Liaise with the case manager and the LA designated officer(s) (LADO) for child protection concerns in cases concerning staff;
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety;
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
 - Ensuring that the school knows which pupils have or had a social worker.
 - Understanding the academic progress and attainment of these pupils.
 - Maintaining a culture of high aspirations for these pupils.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
 - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT
- Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies;
- Understand the assessment process for providing Early Help and intervention;
- Support staff members in liaising with other agencies and setting up inter-agency assessment where Early Help is deemed appropriate;
- Refer cases:
 - To CSCS where abuse and neglect are suspected, and support staff who make referrals CSCS.
 - To Prevent where radicalisation concerns arise, and support any staff who make referrals to Prevent.
 - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.

- Keep cases of Early Help under constant review and refer them to the CSCS if the situation does not appear to be improving;
- Have a working knowledge of how LAs conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the school's Safeguarding and Child Protection Policy and procedures – this will be discussed during the staff induction process;
- Be alert to the specific requirements of children in need, including those with SEND and young carers;
- Keep detailed, accurate and secure records of concerns and referrals and understand the purpose of this record-keeping;
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication;
- Work with the Local Governing Body and Headteacher to ensure the school's Safeguarding and Child Protection Policy is reviewed annually and the procedures are updated and reviewed regularly;
- Ensure the school's Safeguarding and Child Protection Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals;
- Ensure each member of staff has access to and understands the school's Safeguarding and Child Protection Policy and procedures – this will be discussed during the staff induction process;
- Ensure the best educational outcomes by identifying at-risk pupils to the school and its staff, so that the relevant personnel understand each pupil's educational and welfare needs;
- Support teaching staff to identify the challenges that at-risk pupils may face and the additional academic support and adjustments they can make to support these pupils;
- Link with local safeguarding partner arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding;
- Undergo LA training, and update this training at least every two years;
- Undertake specific Prevent awareness training;
- Obtain access to resources and attend any relevant or refresher training courses;
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so;
- Ensure that a pupil's child protection file is transferred (and copied if appropriate and necessary for Deer Park to retain a copy) when transferring to a new school within 5 days, and consider any additional information that should be shared;
- During term time, be available during school hours to discuss any safeguarding concerns. NB. The school will determine what "available" means, e.g. it may be appropriate to be accessible by electronic means such as phone or video conferencing software;

- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms;
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support;
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners;
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.

3.6 The designated teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

4. Multi-agency working

- 4.1 The school contributes to multi-agency working as part of its statutory duty.
- 4.2 The school is aware of and will follow the local safeguarding arrangements.
- 4.3 The school will be fully engaged, involved, and included in the child-centred approach to local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The school will act in accordance with the safeguarding arrangements.
- 4.4 The school will develop trusting relationships between families and agencies protect the welfare of its pupils, through the Early Help process and by contributing to multi-agency plans to provide additional support.
- 4.5 Where a need for Early Help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.
- 4.6 The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for Early Help.
- 4.7 Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.
- 4.8 Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils.
- 4.9 If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL.

- 4.10 The school also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).
- 4.11 The school will reflect the DfE's expectations to secure strong multi-agency working by:
- Collaborating with services to achieve shared goals and share information.
 - Learning from evidence and sharing perspective to evaluate provision.
 - Prioritising and sharing resources depending on pupils' needs.
 - Celebrating inclusivity and diversity and challenging discrimination.
 - Mutually and constructively challenging other's assumptions in a respectful manner

5. Abuse and neglect

- 5.1 For the purposes of this policy, "**abuse**" is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm.
- 5.2 Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.
- 5.3 Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.
- 5.4 For the purposes of this policy, "**physical abuse**" is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.
- 5.5 For the purposes of this policy, "**emotional abuse**" is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.
- 5.6 For the purposes of this policy, "**sexual abuse**" is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also

include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

- 5.7 For the purposes of this policy, “**neglect**” is defined as the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in serious impairment of a child’s health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.
- 5.8 All staff will be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL or deputy DSL.
- 5.9 All staff, especially the DSL and Deputy DSL, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environment; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms).
- 5.10 All staff members will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home and online.
- 5.11 All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse or neglect and, in all cases, will speak to the DSL or Deputy DSL if they are unsure.
- 5.12 When identifying pupils at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following:
- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
 - Lack of concentration and acting withdrawn
 - Knowledge ahead of their age, e.g. sexual knowledge.
 - Use of explicit language
 - Fear of abandonment
 - Depression and low self-esteem.
- 5.13 All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

6. Domestic Abuse

- 6.1 For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “**domestic abuse**” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected.

6.2 “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

6.3 “**Personally connected**” includes people who:

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

6.4 The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse.

6.5 All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

7. **FGM**

7.1 For the purpose of this policy, Female Genital Mutilation (FGM) is defined as all procedures involving the partial or total removal of the external female genitalia, or any other injury to the female genital organs.

7.2 FGM is considered a form of child abuse with long-lasting consequences and is illegal in the UK.

7.3 All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police.

7.4 The school’s procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

7.5 As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Teachers failing to report such cases may face disciplinary action.

NB. The above does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

7.6 All staff will be aware of the indicators that pupils may be at risk of FGM. There are a range of potential indicators that a pupil may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk to the pupil.

7.7 Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

7.8 Indicators that may show a heightened risk of FGM include the following:

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

7.9 Indicators that may show FGM could take place soon include the following:

- When a female family elder is visiting from a country of origin
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk
- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

7.10 Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

7.11 Indicators that FGM may have already taken place include the following:

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

7.12 Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate.

7.13 FGM is also included in the definition of 'honour-based' abuse (HBA), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.

7.14 All forms of HBA are forms of abuse and will be treated and escalated as such.

7.15 Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

8. Forced marriage

8.1 For the purpose of this policy, a "forced marriage" is defined as a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

- 8.2 A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Where an individual lacks the capacity to consent to marriage, coercion is not required for a marriage to be forced.
- 8.3 Forced marriage is a crime in the UK and a form of HBA. The legal age for marriage in England and Wales is 18. It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.
- 8.4 Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.
- 8.5 As part of HBA, all staff will be alert to the signs of forced marriage including, but not limited to, the following:
- Requesting for extended leave of absence and failure to return from visits to country of origin
 - Being fearful of forthcoming school holidays
 - Being subjected to surveillance by siblings or cousins at school
 - Not being allowed to attend extracurricular activities
 - Being withdrawn from school by their parents
 - Being removed from a day centre when they have a physical or learning disability
 - Being prevented from going on to further or higher education
 - Having a family history of forced marriage e.g older siblings have been forced to marry
 - Suddenly announcing they are engaged to a stranger e.g to friends on social media
 - Becoming anxious, depressed and emotionally withdrawn with low self-esteem
 - Showing signs of mental health disorders and behaviours such as self-harm or anorexia
 - Displaying a decline in their behaviour, engagement, educational performance, exam results or punctuality
 - Being absent from school – particularly where this is persistent
 - Displaying a decline in punctuality
 - An obvious family history of older siblings leaving education early and marrying early.
- 8.6 If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSL, headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.
- 8.7 The DSL or headteacher will ensure that the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and their comments taken seriously.

- 8.8 It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.
- 8.9 Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.
- 8.10 If a pupil is being forced to marry, or is fearful of being forced to the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals made on a case by case basis.
- 8.11 Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g referral to CSCS and local and national support groups.
- 8.12 Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and CSCS.
- 8.13 The school will support any victims to seek help by:
- Making them aware of their rights and choices to seek legal advice and representation
 - Recording injuries and making referrals for medical examination where necessary
 - Providing personal safety advice
 - Developing a safety plan in case they are seen e.g by preparing another reason for why the victim is seeking help
- 8.14 The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.
- 8.15 The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided.
- 8.16 The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the schools RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

9. VirginitY testing and hymenoplasty

- 9.1 Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.
- 9.2 Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether

consent has been given. Vaginal examination has no established scientific merit or clinical indication.

- 9.3 Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.
- 9.4 Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.
- 9.5 The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.
- 9.6 Victims face barriers in coming forward e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.
- 9.7 Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:
- A pupil is known to have requested either procedure or asks for help
 - Family members disclose that the pupil has already undergone the practices
 - Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
 - Concern from family members that the pupil is in a relationship, or plans for them to be married
 - A close relative has been threatened with either procedure or has already been subjected to one
 - A pupil has already experienced or is at risk of other forms of HBA
 - A pupil is already known to social services in relation to other safeguarding issues
 - A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling

- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment.

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

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

10. Child sexual exploitation (CSE)

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

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

10.2 CSE does not always involve physical contact, as it can also occur online. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity.

10.3 The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil’s immediate knowledge, e.g. through others sharing videos or images of them on social media.

10.4 The school will also recognise that pupils may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

10.5 The school has adopted the following procedure for handling cases of CSE, as outlined by the DfE:

Identifying cases

10.6 School staff members are aware of and look for the key indicators of CSE; these are as follows:

- Having older partners
- Suffering from sexually transmitted infections or becoming pregnant
- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.

- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part
- Displaying sexual behaviours beyond expected sexual development

Referring cases

- 10.7 Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to the LA.

Support

- 10.8 The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

11. Child criminal exploitation (CCE)

- 11.1 For the purpose of this policy, “**child criminal exploitation**” is defined as: where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, for any, or all, of the following reasons:

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

- 11.2 CCE may be in effect even if the criminal activity appears consensual and can happen through the use of technology.

- 11.3 Specific forms of CCE can include:

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

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

Identifying cases

- 11.5 School staff will be aware of the following indicators that a child is the victim of CCE:

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

12. Mental health

- 12.1 All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering abuse, neglect or exploitation.
- 12.2 Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional.
- 12.3 Staff will be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one.
- 12.4 Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.
- 12.5 Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSL.
- 12.6 The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies such as Young Minds Matter.

13. Homelessness

- 13.1 The DSL and deputy DSL will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.
- 13.2 Indicators that a family may be at risk of homelessness include the following:
 - Household debt
 - Rent arrears
 - Domestic abuse
 - Anti-social behaviour
 - Any mention of a family moving home because “they have to”
- 13.3 Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.
- 13.4 For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

14. County lines

- 14.1 For the purpose of this policy, “**County lines**” refers to organised criminal networks or gangs exploiting children to move, store or sell drugs and money into one or more areas (within the UK). Drugs and money may also be stored by children for the purpose of criminal activity.
- 14.2 Relevant staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs.
- 14.3 Staff members who suspect a pupil may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL.
- 14.4 The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

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

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

15. Serious violence

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

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

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

- Being male
- Having been frequently absent from school
- Having been permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending

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

15.4 The school will be aware that the Police, Crime, Sentencing and Courts Act will introduce a new duty in early 2023 on a range of specified authorities, such as the police, to share data and information, and put plans in place to prevent and reduce serious violence within their local communities. Schools will be under a separate duty to cooperate with core duty holders when asked – the school will ensure arrangements are in place to do so.

16. Pupils with family members in prison

16.1 Pupils with a family member in prison will be offered pastoral support as necessary.

- 16.2 They will receive a copy of 'Are you a young person with a family member in prison' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

17. Pupils required to give evidence in court

- 17.1 Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.
- 17.2 Pupils will also be provided with the booklet 'Going to Court and being a witness' from HM Courts and Tribunal Service where appropriate and allowed the opportunity to discuss questions and concerns.

18. Contextual safeguarding

- 18.1 Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and their deputy(s), will always consider the context of incidents – this is known as contextual safeguarding.
- 18.2 Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.
- 18.3 The school will provide as much contextual information as possible when making referrals to CSCS.

19. Preventing radicalisation

- 19.1 For the purpose of this policy, we have used the following definitions:
- **"Radicalisation"** is defined as the process by which an individual or group comes to support terrorism and extremist ideologies associated with terrorist groups;
 - **"Extremism"** is defined as the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces;
 - **"Terrorism"** is defined as violent threats or actions designed to influence government or intimidate the public with the purpose of advancing a political, religious or ideological cause. This includes endangering or causing serious violence to a person or people, serious damage to property, and seriously interfering or disrupting an electronic system.
- 19.2 The school will maintain an up-to-date awareness of the risk and threat posed in the local area and the latest developments in best practice.
- 19.3 Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties.
- 19.4 The school will assess the risk of pupils being radicalised and drawn into extremism and/or terrorism through identifying the factors that affect children in the local area and knowing how to identify those at risk. Where a pupil is identified as being at risk, proportionate action will be taken.
- 19.5 The school protects the right to freedom of expression. The points in this section are not intended or designed to restrict or prevent legitimate and lawful congregation or debate.

- 19.6 Staff will be alert to changes in pupils' behaviour which could indicate that they may be in need of help or protection.
- 19.7 Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or Deputy DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.
- 19.8 The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.
- 19.9 Any concerns over radicalisation will be discussed with a child's parents, unless the school has reason to believe that the child would be placed at risk as a result.
- 19.10 The school will aim to integrate pupils into the school community and channel their desire for excitement and adventure into suitable and healthy activities.
- 19.11 Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "the Prevent Duty".
- 19.12 The school uses filtering and monitoring software to protect pupils from terrorist and extremist material online.
- 19.13 The DSL and Deputy DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation. All staff will complete the Home Office Prevent Training online.

Risk indicators of vulnerable pupils

- 19.14 The school will always aim to integrate and engage every child within the school community.
- 19.15 Indicators of an identity crisis include the following:
- Distancing themselves from their cultural/religious heritage
 - Uncomfortable with their place in society
- 19.16 Indicators of a personal crisis include the following:
- Family tensions
 - A sense of isolation
 - Low self-esteem
 - Disassociation from existing friendship groups
 - Searching for answers to questions about identity, faith and belonging
- 19.17 Indicators of vulnerability through personal circumstances includes the following:
- Migration
 - Local community tensions
 - Events affecting their country or region of origin
 - Alienation from UK values
 - A sense of grievance triggered by personal experience of racism or discrimination

19.18 Indicators of vulnerability through unmet aspirations include the following:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality:
- Experiences of dealing with the police
- Involvement with criminal groups

Making a judgement

19.19 Although extremist behaviour can be presented in many forms, the school recognises the following as potential indicators of radicalisation or a susceptibility to radicalisation:

- Disclosure about extremist or radicalised behaviour by pupils – this could include exposure to materials outside of school
- Use of specific terms associated with certain ideological views, e.g. ‘hate’ language
- Intelligence reports from local and national agencies regarding the radicalisation of groups of people in the local area
- Focus on specific narratives that highlight particular extremist views
- Evidence of accessing online materials that include extremist materials
- Refusal to accept views expressed by others which is counter to the school’s Equality Information and Objectives Policy
- Documented concerns raised by parents or family members about the changing behaviour of the pupil
- References to an extremist narrative in the pupil’s work
- Disassociation from existing friendship groups
- A loss of interest in activities in which they previously engaged
- Behavioural characteristics, such as low self-esteem, isolation, and perceptions of failure and injustice
- Family tensions
- Events affecting their country or region of origin
- Alienation from British values
- Grievance triggered by personal experience of discrimination
- Property damage
- Refusal to cooperate with the requests of teachers or other adults

19.20 When making a judgement, staff will ask themselves the following questions:

- Does the pupil have access to extremist influences through the internet?
- Does the pupil sympathise with, or support, extremist groups or behaviour in their speech or written work?
- Does the pupil’s demeanour suggest a new social, religious or political influence e.g. through jewellery or clothing?
- Has the pupil previously been a victim of discrimination or a religious crime?
- Has the pupil experienced any major disagreements with their peers, family or faith groups, leading to rejection, isolation or exclusion?
- Does the pupil display an irregular and distorted view of religion or politics?
- Does the pupil display a strong objection towards specific cultures, faiths or race?

- Is the pupil a foreign national awaiting a decision regarding deportation or immigration?
- Is there an irregular pattern of travel within the pupil's family?
- Has the pupil witnessed or suffered from trauma or violence in a war zone or through sectarian conflict?
- Is there evidence of a relative or family friend displaying extremist views?
- Is the pupil known to have possessed, or be actively seeking, extremist literature/other media?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil travelled for extended periods of time to international locations?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil display a lack of affinity or understanding for others?
- Is the pupil the victim of social isolation?

19.21 Critical indicators include where the pupil is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

19.22 All staff will complete Prevent training via the Home Office when they join the school. This will allow them to be aware of the factors (push and pull) that could make a pupil vulnerable to being drawn into extremism or radicalisation. Updates in relation to Prevent and anti-extremism will be shared with staff when necessary taking into account the risk of terrorism and extremism in the local area.

19.23 Push factors include when a pupil may be feeling:

- Isolated
- That they do not belong
- That they have no purpose
- Low in self-esteem
- That their aspirations are unmet
- Angry or frustrated
- A sense of injustice
- Confused about life or the world
- Real or perceived personal grievances

19.24 Staff will be aware that pull factors can include where extremist or terrorist groups:

- Offer a sense of community and a support network.
- Promise fulfilment or excitement.
- Make the pupil feel special and part of a wider missions

- Offer a very narrow, manipulated version of an identity that often supports stereotypical gender norms.
- Offer inaccurate answers or falsehoods to grievances.
- Encourage conspiracy theories.
- Promote an 'us vs. them' mentality.
- Blame specific communities for grievances.
- Encourage the use of hatred and violent actions to get justice.
- Encourage ideas of supremacy.

Making a referral

- 19.25 In accordance with the school's Child Protection and Safeguarding Policy, if any member of staff has any concerns about a pupil, they will raise this with the DSL or Deputy DSL either in person or through CPOMS.
- 19.26 Parents will be contacted to discuss the issue and investigate where there are any mitigating home circumstances, unless doing so would put the pupil at further risk of harm. A decision will then be made to determine whether a referral should be made to Prevent. In most cases, the DSL or Deputy DSL will refer the case to Prevent where there is a radicalisation concern, as appropriate.
- 19.27 Staff members may make referrals using the Prevent national referral form if they deem it necessary – the DSL or Deputy DSL will be notified in all cases.
- 19.28 Following a referral made to Prevent, a Channel panel will meet to discuss the referral, assess the risk and decide whether the person should be accepted into channel. The panel will be chaired by the LA and attended by multi-agency partners including the police, education professionals, health services, housing and social services. Staff members will be notified if they are required to attend a Channel panel following a referral made to Prevent.
- 19.29 The DSL or Deputy DSL will follow up any referrals and the pupil will be monitored for a period of time to determine whether there have been any changes in behaviour. Parents will be consulted during this period, unless doing so would put the pupil at further risk of harm.
- 19.30 The DSL or Deputy DSL will record and retain all incidents for school records in accordance with the Data Protection Act 2018 and the UK GDPR, as outlined in the Data Protection Policy.
- 19.31 The police will be notified immediately if someone is about to put themselves or others in immediate danger, or if they appear to be involved in planning to carry out a criminal offence and the school's emergency procedures will be followed.

Channel and Prevent

- 19.32 Channel, a key element of the Home Office's Prevent strategy, is a multi-agency approach to protect people at risk from radicalisation.
- 19.33 The school will work with the LA, local law enforcement, and religious and community leaders where appropriate, to identify children vulnerable to radicalisation and to challenge extremism if it arises.
- 19.34 This includes identifying pupils to whom any of the following criteria applies:

- Displaying feelings of grievance and injustice
- Feeling under threat
- Searching for identity, meaning and belonging
- Displaying a desire for status amongst their peers
- Displaying a desire for excitement and adventure
- Displaying a need to dominate and control others
- Displaying a susceptibility to indoctrination
- Displaying a radical desire for political or moral change
- Appearing susceptible to opportunistic involvement
- Having family or friends involved in extremism
- Appearing susceptible to being influenced or controlled by a group
- Displaying relevant mental health issues

- 19.35 Referrals made to Prevent will first be handled by Prevent Case Management, which will screen for genuine vulnerabilities. The Prevent Case Management will decide whether further action is required and, if so, will either refer the issue to mainstream services as required or carry the investigation forward to a Channel panel which will gather further information from partners and agree on the support required. The school will ensure that information is shared as required.
- 19.36 The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.
- 19.37 The school will keep in mind that an individual's engagement with the Channel programme is voluntary at all stages.
- 19.38 The school will cooperate with local panels involved in the Channel process. A representative of the school will attend meetings as required to aid the mitigation of identified risk and vulnerabilities. This could include contributing to the support plan and sharing information necessary to the effective working of the panel.
- 19.39 The school will consider if it would be appropriate to share any information with a new school or college in advance of a pupil leaving e.g if the pupil is currently receiving support through the Channel programme and the information would allow the new setting to have support in place for when the pupil arrives.
- 19.40 Extremist Speakers – the school's Lettings Policy includes some vetting to prevent speakers who may promote extremist views from using the school premises. The school ensures that balanced viewpoints are expressed by staff and outside speakers.

Building children's resilience

- 19.41 The school will:
- Ensure the school is a safe space in which pupils can understand and discuss sensitive topics, including terrorism and extremism, and are able to challenge these ideas.
 - Promote fundamental British values, alongside pupils' spiritual, moral, social and cultural development through the curriculum and opportunities on offer to pupils.
 - Allow pupils time to explore sensitive and controversial issues.

- Provide pupils with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip pupils to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach pupils about how democracy, government and law making/enforcement occur.
- Teach pupils about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

Resources

- 19.42 The school will develop effective partnerships with local prevent leads, the police and the LA through multi-agency forums.
- 19.43 The school will utilise a wide range of resources including but not limited to:
- Local safeguarding arrangements
 - Local police (contacted via 101 for non-emergencies)
 - The DfE's dedicated helpline (020 7340 7264)
 - The Channel awareness programme
 - The Educate Against Hate website
 - Outside speakers, with appropriate vetting checks.

20. Children absent from education

- 20.1 A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future.
- 20.2 The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future.
- 20.3 Staff will monitor pupils who go missing from the school, particularly on repeat occasions, these will be dealt with by the Attendance Support Officer in the first instance. The Attendance Support Officer will liaise with the DSL and normal safeguarding procedures will be followed when necessary. The school will follow the DfE's [guidance](#) on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.
- 20.4 In line with the Children Act 2004, the school will follow appropriate procedures when carrying out reasonable enquiries to determine whether a child may be at risk of harm. Reasonable procedures are defined as limited, investigative powers that the school may action to determine a child's whereabouts and whether they may be in danger such as discussions with relatives, landlords, neighbours.
- 20.5 The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

Admissions register

- 20.6 Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending.
- 20.7 The school will notify the LA within five days of when a pupil's name is added to the admissions register.
- 20.8 The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur.
- 20.9 Two emergency contact details will be held for each pupil where possible.
- 20.10 Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.
- 20.11 If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:
- The full name of the parent with whom the pupil will live
 - The new address
 - The date from when the pupil will live at that address
- 20.12 If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:
- The name of the new school
 - The date on which the pupil first attended, or is due to attend, that school
- 20.13 Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.
- 20.14 To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:
- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
 - Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
 - Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention of the pupil continuing to attend school after ceasing to be of compulsory school age.
 - Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
 - Have been permanently excluded.
 - Have died.
 - Have been registered at another school where it is not indicated this should be the case.

- Are registered at more than one school but have failed to attend the school and the proprietor of any other schools concerned have consented to the deletion.
- Have been granted authorised leave but have failed to attend school within 10 school days after the period of authorised absence ended, and;
 - There is reason to believe the pupil is able to attend school;
 - The LA and school are unable to determine the pupil's whereabouts after making joint reasonable enquires.
- Have been continuously absent from school for a period of at least 20 school days and:
 - The absence was not authorised;
 - There is reason to believe the pupil is able to attend school;
 - The LA and school are unable to determine the pupil's whereabouts after making joint reasonable enquires.
 -
- Will cease to be of compulsory school age before the school next resumes i.e after the summer, and the relevant person has indicated the pupil will not attend the school.

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

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

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

20.17 The school will work with the LA to establish methods of making returns for pupils back into the school.

20.18 The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown.

20.19 The school will also highlight any other necessary contextual information including safeguarding concerns.

21. Child abduction and community safety incidents

21.1 For the purposes of this policy, "**child abduction**" is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child.

21.2 Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

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

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

22. Modern Slavery

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

22.2 All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery and discuss any concerns with the DSL or Deputy DSL.

22.3 Staff will also be made aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

23. Pupils potentially at greater risk of harm

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

Pupils who need social workers

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

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

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

Home-educated children

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

23.6 In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

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

LAC and PLAC

- 23.8 Children most commonly become looked after because of abuse and/or neglect. Because of this they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.
- 23.9 The Local Governing Body will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:
- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
 - Contact arrangements with parents or those with parental responsibility.
 - Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.
- 23.10 The Designated Teacher for LAC will have the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers. These will be shared with the DSL and Deputy DSL.

Pupils with SEND

- 23.11 When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:
- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability;
 - Pupils with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs;
 - Communication barriers may exist, as well as difficulties in overcoming these barriers.
- 23.12 When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration.
- 23.13 When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENDCO, as well as the pupil's family where appropriate, to ensure that the pupil's needs are effectively met.

LGBTQ+ pupils

- 23.14 The fact that a pupils may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals.
- 23.15 Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.
- 23.16 Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with who they can speak openly with.
- 23.17 Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

24. Alternative provision

- 24.1 The school will remain responsible for a pupil's welfare during their time at an alternative provider.
- 24.2 When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

25. Work experience

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

26. Homestay exchange visits

School-arranged homestays in UK

- 26.1 Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay.
- 26.2 In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.
- 26.3 Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host.
- 26.4 In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

- 26.5 The school will liaise with partner schools to discuss and agree the arrangements in place for the visit.
- 26.6 The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK.
- 26.7 The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange.
- 26.8 Pupils will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

- 26.9 Where a parent or pupil arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

27. Private fostering

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

28. Concerns about a pupil

- 28.1 If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or the deputy DSL.
- 28.2 Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.
- 28.3 All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in section 35 of this policy.
- 28.4 Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL with the matter.
- 28.5 If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.
- 28.6 The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer.
- 28.7 Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil.
- 28.8 If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.
- 28.9 If Early Help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered.
- 28.10 All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded on CPOMS. Handwritten information will be kept securely in a locked cabinet in meeting room 2 adjacent to the pastoral office.
- 28.11 If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately.
- 28.12 If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.
- 28.13 Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views.

- 28.14 When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.
- 28.15 An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.
- 28.16 The school will consider whether a family group conference is appropriate to determine the help and support the family network can provide for a pupil where concerns have been raised about their safety or wellbeing. Where necessary school, or another agency, can make a referral to the Gloucestershire Family Group Conference Team.

29. Early Help

- 29.1 Early Help means providing support as soon as a problem emerges, at any point in a child's life. The school will be proactive in ensuring that pupils are able to access full-time education, as far as possible, to aid their development and protect them from harm whilst also identifying concerns as early as possible
- 29.2 Any pupil may benefit from Early Help, but in particular staff will be alert to the potential need for Early Help for pupils who:
- Are disabled, have certain health conditions, or have specific additional needs;
 - Have SEND, regardless of whether they have a statutory EHCP;
 - Have mental health needs;
 - Are young carers;
 - Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
 - Are frequently missing or going missing from care or from home;
 - Are at risk of modern slavery, trafficking, or sexual or criminal exploitation;
 - Are at risk of being radicalised or exploited;
 - Have family members in prison, or are affected by parental offending;
 - Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse;
 - Misuse drugs or alcohol;
 - Have returned home to their family from care;
 - Are at risk of HBA, such as FGM or forced marriage;
 - Are privately fostered;
 - Are missing education, or persistently absent from education, or not in receipt of full-time education;
 - Show early signs of abuse and/or neglect in other ways;
 - Are bereaved;
 - Are viewing problematic or inappropriate online content or developing inappropriate relationships online;
 - Have experienced multiple suspensions and are at risk of, or have been, permanently excluded.
- 29.3 Early Help will also be used to address non-violent harmful sexual behaviour to prevent escalation.

- 29.4 All staff will be made aware of the local Early Help process and understand their role in it. Since October 2016 Gloucestershire has used a graduated approach to Early Help in line with the graduated approach to SEND.
- 29.5 The DSL or deputy DSL will take the lead where Early Help is appropriate and may delegate the completion of the Early Help referral to a member of the pastoral team. If the referral leads to TAC/TAF meetings it may be deemed more appropriate by the DSL for the Year Leader to attend these meetings.
- 29.6 The local Early Help process will be followed as required.
- 29.7 Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.
- 29.8 The school will liaise with other agencies and take an active role in TAC (Team Around the Child) and TAF (Team around the Family) meetings when required and will work with the local MASH (Multi-Agency Safeguarding Hub). In Gloucestershire MASH is a partnership between Gloucestershire County Council, Gloucestershire Constabulary, Gloucestershire Domestic Abuse Support Service, Gloucestershire Schools and Gloucestershire Health Services.
- 29.9 As part of the school's commitment to keeping children safe we have agreed to implement the principles and aims of the Gloucestershire Encompass Model. In agreeing to Gloucestershire Encompass the Local Governing Body and Senior Leadership Team:
- Endorse the Gloucestershire Encompass Model and support the key adults in our school to fulfil the requirements of the Gloucestershire Encompass Protocol;
 - Promote and implement Gloucestershire Encompass processes and use these in accordance with internal safeguarding children processes;
 - Recognise the sensitive nature of the information provided and ensure that this is retained in accordance with the principles of data protection.
- 29.10 The school can provide access to a counsellor or mentor for pupils with specific identified needs and will make use of the school nursing service.
- 29.11 The school will raise awareness of issues such as eating disorders, self-harm, E-safety, FGM, CSE, radicalisation and healthy relationships through curriculum lessons, assemblies and speakers from other agencies. Chelsea's Choice (a short play) is shown to all pupils in Year 8.

30. Managing referrals

- 30.1 The reporting and referral process outlined in Appendix A will be followed accordingly.
- 30.2 All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed.
- 30.3 When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

- 30.4 The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved.
- 30.5 The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.
- 30.6 Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker or social care team for more information.
- 30.7 The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS.
- 30.8 Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. The Escalation of Professional Concerns Procedure may also be used.
- 30.9 Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as Early Help and pastoral support.
- 30.10 At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so when appropriate.
- 30.11 Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm.
- 30.12 The school will work closely with parents to ensure that the pupil, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

31. Concerns about staff members and safeguarding practices

- 31.1 If a staff member has concerns about another member of staff (including supply staff and volunteers) it will be raised with the Headteacher or the DSL.
- 31.2 If the concern is with regards to the Headteacher, it will be referred to the chair of the Local Governing Body.
- 31.3 Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy.
- 31.4 If a staff member feels unable to raise an issue with the SLT, they should follow the guidance in the Whistleblowing Policy or access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

32. Allegations of abuse against staff

- 32.1 All allegations against staff, supply staff, volunteers and contractors will be dealt with in line with The Corinium Education Trust's 'Allegations of Abuse Against Staff' policy, a copy will be available on InCET. (InCET is the Corinium Education Trust MAT portal

for MAT staff where documents can be uploaded and shared). Staff are expected to understand it.

- 32.2 The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.
- 32.3 When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”, as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:
- Behaved in a way that has harmed a child, or may have harmed a child;
 - Committed or possibly committed a criminal offence against or related to a child;
 - Behaved towards a child in a way that indicates they may pose a risk of harm to children;
 - Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.
- 32.4 When using an agency to access supply staff, the school will inform them of its processes for managing allegations, including any updates to the relevant policies, and liaise with the agency’s human resources manager/provider where necessary.
- 32.5 When an allegation is made, an investigation will be carried out to gather enough evidence to establish whether it has a foundation, and the school will ensure there is sufficient information to meet the DBS referral criteria.
- 32.6 On conclusion of a case, where an individual is removed from regulated activity – this could be due to suspension, redeployment to work that is not in regulated activity, dismissal or resignation – the school will refer the case to the DBS as soon as possible.
- 32.7 If a case manager is concerned about the welfare of other children in the community following a staff member’s suspension, they may report this concern to CSCS.
- 32.8 The school will preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry in question.

33. Child-on-child abuse

- 33.1 For the purposes of this policy, “**child-on-child abuse**” is defined, for the purposes of this policy, as any form of abuse inflicted by one child or a group of children, i.e. individuals under the age of 18, against another child or group of children.
- 33.2 The school has a zero-tolerance approach to abuse, including child-on-child abuse.
- 33.3 All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online.
- 33.4 All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports.
- 33.5 All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL or Deputy DSL if they have concerns about child-on-child abuse.

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

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying. Bullying will generally be dealt with in line with the Anti-Bullying Policy.
- Intimate partner abuse in personal relationships between peers- sometimes known as 'teenage relationship abuse'. This involves a romantic partnership between children in which one or both partners are emotionally, physically or sexually abusive to the other. This could include: repetitive insults, controlling behaviour e.g. preventing a child from socialising with others or deliberately isolating them from sources of support, sexual harassment, threats of physical or sexual abuse. The school will manage intimate partner abuse in the same way as a case of abuse between any other children.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Discriminatory behaviour- encompasses abuse inflicted on a pupil because of their protected characteristics, e.g. religion, ethnicity, gender, sexual orientation, culture, or any SEND. Discriminatory behaviour is never acceptable. In accordance with the Equality Act 2010, schools will not tolerate unlawful discrimination against pupils because of any protected characteristics they may have.
- Upskirting.
- Sexual violence encompasses the definitions provided in the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, i.e. non-consensual sexual touching, and causing another child to engage in sexual activity without consent, e.g. forcing someone to touch themselves sexually. It may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment refers to any sexual behaviour that could violate another child's dignity, make them feel intimidated, degraded or humiliated, and/or create a hostile, offensive or sexualised environment, including:
 - Sexualised jokes, taunting or comments;
 - Physical behaviour, e.g. deliberately brushing against someone;
 - Online sexual harassment, including upskirting, sexualised online bullying, unwanted sexual comments and messages, including on social media, sexual threats or coercion.
- The sharing of sexualised imagery can also constitute sexual harassment – this refers to the consensual and non-consensual sharing between pupils of sexually explicit content, including that which depicts:
 - Another child posing nude or semi-nude;
 - Another child touching themselves in a sexual way;
 - Any sexual activity involving another child;
 - Someone hurting another child sexually.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

33.7 The DSL will ensure they appropriately assess instances of child-on-child abuse, including in cases of image-based abuse to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will refer

the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

33.8 “**Harmful sexual behaviour**” is defined as any sexual behaviour which:

- Does not observe and respect any individuals on the receiving end of the behaviour, e.g. touching someone without their consent;
- Is inappropriate for the age or stage of development of the pupil;
- Is problematic, abusive or violent;
- May cause developmental damage.

Harmful sexual behaviour can occur online and/or face to face, and can also occur simultaneously between the two.

33.9 The policy will use the following terms to describe pupils involved in child-on-child abuse:

- **Victim(s)** – the individual(s) against whom the abuse has, or has allegedly, been inflicted.
- **Perpetrator(s)** – the individual(s) exhibiting abusive behaviour against their peers.
- **Alleged perpetrator(s)** – individual(s) against whom a report of abusive behaviour has been made, where guilt has not yet been ascertained.

Note: The use of the word ‘alleged’ does not mean that the pupil in question is not guilty of child-on-child abuse, that the school does not believe the allegation, or that the allegation will not be taken seriously. Staff will remember that the school has a legal duty of care to all perpetrators and alleged perpetrators who are pupils at the school, including a requirement to ensure they can access their education. Staff will also keep in mind that, in some cases, the abusive behaviour will have been harmful to the perpetrator as well. Staff will think very carefully about terminology when speaking in front of pupils. Victims will be reassured that use of the term ‘alleged perpetrator’ is not an attempt to discredit their allegation.

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

33.11 The school will implement a contextual approach to safeguarding pupils against child-on-child abuse, and will ensure that all procedures take into account incidents of child-on-child abuse that occur outside of school or online.

33.12 The school prioritises cultivating a safe and respectful environment amongst pupils, and ensures that all pupils are aware that the school adopts a **zero-tolerance stance** on child-on-child abuse of any kind.

33.13 The school promotes respectful interactions amongst pupils, and all staff model appropriate and respectful behaviour.

33.14 The school’s procedures for managing allegations of child-on-child abuse are outlined below. The school will ensure that procedures for handling child-on-child abuse are transparent, clear and understandable, and are readily accessible to any member of the school community who wishes to access them. Staff will follow these procedures,

as well as the procedures outlined in the school's Anti-Bullying Policy and Exclusion Policy, where relevant.

A preventative approach

- 33.15 The school will ensure that wider societal factors that exacerbate the problem of child-on-child abuse are reflected in its approach to creating a preventative culture. This means that individuals who are more likely to be abused, e.g. girls or LGBTQ+ pupils, or who are at increased risk of acting as a perpetrator in abusive situations, e.g. due to abusive home situations or anger management issues, are given additional support from an early stage.
- 33.16 The school will educate pupils about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons.
- 33.17 The school will manage all early help and interventions for pupils that show early signs of harmful behaviour.
- 33.18 The curriculum will ensure that pupils of all ages are taught about and understand the concept of consent and its importance in an age-appropriate way.
- 33.19 The school will also ensure that pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSHE and group sessions. Such content will be age and stage of development specific, and tackle issues such as, but not limited to, the following:
- Healthy and respectful relationships
 - Boundaries and consent
 - How to recognise an abusive relationship, including coercive and controlling behaviour
 - Stereotyping and equality
 - LGBTQ+ identities and relationships
 - Body confidence and self-esteem
 - Prejudiced behaviour
 - What constitutes as sexual violence and sexual harassment and why these are always unacceptable
 - Addressing cultures of sexual harassment
 - Laws and how to access support relating to abuse, consent, HBA, grooming etc.
- 33.20 Pupils will be allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled.

Awareness

- 33.21 All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up” or “boys being boys”.
- 33.22 The school is aware that, while child-on-child abuse can be perpetrated by, and against, anyone, there are certain groups of pupils who are at an increased risk of being on the receiving end of child-on-child abuse.

Girls

- 33.23 All staff will be aware that girls are more likely to be on the receiving end of child-on-child sexual abuse than their male counterparts, and that sexual violence and harassment against girls is very common and accounts for the majority of cases.
- 33.24 Taking into account that sexual harassment against girls is widespread in society, and largely based in gender inequality, the school will aim to encourage gender equality in all aspects of its operations. The school will aim to promote and nurture healthy attitudes and relationships amongst pupils of all genders, e.g. by challenging and working to deconstruct gender stereotypes in school.
- 33.25 Staff will challenge any incidents of misogynistic language or gender-based abuse, whether of a sexualised nature or not, as holding misogynistic viewpoints can make a pupil more likely to commit sexualised violence in the future.

Pupils with SEND

- 33.26 All staff will be made aware of the heightened vulnerability of pupils with SEND, who are three times more likely to be abused than their peers.
- 33.27 The school will ensure that there are mechanisms in place to support pupils with SEND in reporting abuse, with due regard that these pupils may face additional barriers to reporting abuse and that spotting signs of abuse in these pupils may be harder.
- 33.28 Staff will not assume that possible indicators of abuse relate to the pupil's SEND and will always explore indicators further. The DSL, or Deputy DSL, and the SENDCO will collaborate in the handling of instances of abuse towards pupils with SEND to ensure that barriers to communication can be effectively managed.

LGBTQ+ pupils

- 33.29 All staff will be made aware of the heightened vulnerability of LGBTQ+ pupils, who evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children.
- 33.30 The school holds a zero-tolerance policy towards pupils using homophobic, biphobic or transphobic language, regardless of whether or not the language is being directed at another individual. Every staff member is individually responsible for challenging such behaviour and making clear to all pupils that any abuse towards pupils who are LGBTQ+, or who are perceived to be, is unacceptable.
- 33.31 The school will ensure that LGBTQ+ pupils are able to speak out and/or share their concerns with members of staff.

Black, Asian and minority ethnic (BAME) pupils

- 33.32 All staff will be aware that minority ethnic pupils, particularly black pupils, may be less likely to report abuse committed against them, and may be more likely to be misidentified as perpetrators of abuse.
- 33.33 Staff will also be aware that BAME girls, BAME pupils with SEND, or BAME LGBTQ+, or perceived LGBTQ+ pupils, are likely to face increased abuse due to the intersection of these identities. Staff will be vigilant with regard to these pupils and the ways in

which other pupils behave towards them, in order to ensure any incidents or potential incidents can be handled as soon as they occur.

- 33.34 The school will hold a zero-tolerance policy towards pupils using racist language, regardless of whether the language is directed at another individual. Every staff member is responsible for challenging such behaviour and making it clear to all pupils that any abuse towards pupils from BAME backgrounds is unacceptable.

Reporting abuse

- 33.35 The school's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.
- 33.36 The school will maintain a culture that promotes reporting abuse, whether the individual is the victim, a bystander, or a friend or relative of the victim.
- 33.37 Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will be reassured that they will be taken seriously, be supported, and kept safe.
- 33.38 Staff will address any incidents of pupils equating reporting abuse to 'snitching' or being a 'tattle-tale', and will convey to these pupils how important it is to report abuse to help tackle the wider problem of child-on-child abuse in schools.
- 33.39 Staff will remain cognisant that downplaying abusive behaviour can lead to a culture of unacceptable behaviour throughout the school and, as such, will treat all displays or reports of abusive behaviour with the utmost severity and sensitivity in order to reinforce to all pupils that such behaviour will not be tolerated, and to prevent further instances of this behaviour in the future.
- 33.40 Victims will never be made to feel like they are causing a problem by reporting any form of abuse, be made to feel ashamed, or have their experience minimised by staff.
- 33.41 Staff will be aware that they have a duty of care to both the alleged perpetrator(s) and victim(s).
- 33.42 When identifying pupils at risk of potential harm or who have been harmed by their peers, staff members will look out for a number of indicators including, but not limited to, the following:
- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
 - Lack of concentration and acting withdrawn
 - Knowledge ahead of their age, e.g. sexual knowledge
 - Use of explicit language
 - Fear of abandonment
 - Depression and low self-esteem
 - Changes to their social group, e.g. spending time with older pupils, or social isolation
 - Alcohol or substance misuse

Support available if a child has been harmed, is in immediate danger or at risk of harm

33.43 The school will ensure that action is taken, where possible, before major concerns arise; therefore, incidents of low-level abuse related to the characteristics of the below groups will be handled in line with early help procedures

33.44 If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to CSCS.

33.45 Within one working day, a social worker will respond to the referrer to explain the action that will be taken.

Support available if Early Help, section 17 and/or section 47 statutory assessments are appropriate

33.46 If Early Help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

Support available if a crime may have been committed

33.47 Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to CSCS. The DSL will be aware of the local process for referrals to both CSCS and the police.

33.48 Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.

33.49 The school has a close relationship with the local police force and the DSL will liaise closely with the local police presence.

Support available if reports include online behaviour

33.50 Online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

33.51 If the incident involves sexual images or videos held online, the police will be contacted and parents informed if they are not already aware. The Internet Watch Foundation will be consulted to have the material removed by an appropriate person.

33.52 Staff will not view or forward illegal images of a child unless asked to do so by the Police. If they are made aware of such an image, they will contact the DSL.

Managing disclosures

33.53 Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.

33.54 Staff will be aware of the importance of not downplaying any reports of abuse; however, will ensure that they remain sympathetic, and observant of the duty of care, to both the alleged perpetrator(s) and victim(s).

33.55 If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff

will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of CSCS where necessary. If staff are in any doubt, they will speak to the DSL.

- 33.56 Where an alleged incident took place away from the school or online but involved pupils from the school, the school's duty to safeguard pupils remains the same and the incident will be treated equally as seriously and investigated in the same way as an incident that took place in school.
- 33.57 Staff will enforce the school's policy that no known and substantiated incident of abusive or harmful behaviour between pupils will occur without consequences for the perpetrator(s), although these consequences will be decided on a case-by-case basis and will take into account the views of any victims involved, the context of the behaviour and the severity of the incident.
- 33.58 All staff will be trained to handle disclosures. Effective safeguarding practice includes:
- Never promising confidentiality at the initial stage;
 - Only sharing the report with those necessary for its progression;
 - Explaining to the victim what the next steps will be and who the report will be passed to;
 - Recognising that the person the child chose to disclose the information to is in a position of trust;
 - Being clear about boundaries and how the report will be progressed;
 - Not asking leading questions and only prompting the child with open questions;
 - Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted;
 - Only recording the facts as the child presents them – not the opinions of the note taker;
 - Understanding that victims may not disclose the whole picture immediately and may be more comfortable providing information on a step by step basis;
 - Ensuring that dialogue is kept open and encouraged;
 - Where the report includes an online element, being aware of searching, screening and confiscation advice and UKCIS (previously UKCCIS) sexting advice;
 - Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy as one of the staff members);
 - Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.
- 33.59 Staff will be aware that just because a victim of abusive behaviour does not report the behaviour or react to the behaviour negatively, this does not mean that the behaviour is not still harmful; some pupils will be uncomfortable challenging their peers on inappropriate behaviour, or may not be aware themselves that the behaviour is abusive. Staff have a responsibility to ensure that both the perpetrator(s), or alleged perpetrator(s), and the victim(s) understand that such behaviour inflicted by or against them was unacceptable; failing to challenge a pupil on unacceptable behaviour can normalise that behaviour not just for the pupil in question, but for all pupils who see the behaviour going unchallenged.

- 33.60 The DSL will be informed of any allegations of abuse against pupils with SEND. They will record the incident on CPOMS and, working with the SENDCO, decide what course of action is necessary, with the best interests of the pupil in mind at all times.

Confidentiality

- 33.61 The school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school cannot make this promise. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.
- 33.62 The DSL will consider the following when making confidentiality decisions:
- Parents will be informed unless it will place the victim at greater risk.
 - If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to CSCS.
 - Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.
- 33.63 The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

Anonymity

- 33.64 There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.
- 33.65 When deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

Risk assessment

- 33.66 The DSL or a deputy alongside senior staff will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.
- 33.67 Risk assessments will consider:
- The victim, especially their protection and support.
 - Whether there have been other victims.
 - The alleged perpetrator.
 - Other children at the school, especially any actions that are appropriate to protect them.

- The time and location of the incident, and any action required to make the location safer.

33.68 Risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the school's Data Protection Policy.

Taking action following a disclosure

33.69 The DSL or a deputy will decide the school's initial response, taking into consideration:

- The victim's wishes;
- The nature of the incident;
- The ages and developmental stages of the children involved;
- Any power imbalance between the children;
- Whether the incident is a one-off or part of a pattern;
- Any ongoing risks;
- Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare;
- The best interests of the child;
- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

33.70 Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved.

33.71 For reports of rape and assault by penetration, whilst the school establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The school will consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator.

33.72 For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately.

33.73 Where a pupil is found to have been involved in harmful sexual behaviour, e.g. non-consensually sharing indecent imagery of another pupil, the school will help the pupil to move forward from the incident by supporting them in adopting more positive behaviour patterns and attitudes.

33.74 In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

Managing the report

33.75 The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to CSCS or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.

33.76 There are four likely outcomes when managing reports of sexual violence or sexual harassment:

- Managing internally
- Providing Early Help

- Referring to CSCS
- Reporting to the police

33.77 Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically.

33.78 The following situations are statutorily clear and do not allow for contrary decisions:

- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is always rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

Managing internally

33.79 In some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and anti-bullying policies and by providing pastoral support.

Providing Early Help

33.80 The school may decide that statutory interventions are not required, but that pupils may benefit from Early Help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Referral to CSCS

33.81 If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to CSCS. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with CSCS.

33.82 The school will not wait for the outcome of an investigation before protecting the victim and other children.

33.83 The DSL will work closely with CSCS to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.

33.84 If CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.

33.85 If the school agrees with the decision made by CSCS, they will consider the use of other support mechanisms such as Early Help, pastoral support and specialist support.

Reporting to the police

33.86 Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in

parallel with referral to CSCS. The DSL and Deputy DSL will follow the local process for referral.

- 33.87 Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the child with any decision they take, in unison with CSCS and any appropriate specialist agencies.
- 33.88 The DSL and senior staff will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.
- 33.89 The DSL will be aware of local arrangements and specialist units that investigate child abuse.
- 33.90 In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

Bail conditions

- 33.91 Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks.
- 33.92 The school will work with CSCS and the police to support the victim, alleged perpetrator and other children (especially witnesses) during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.
- 33.93 The term 'released under investigation' (RUI) is used to describe alleged perpetrators released in circumstances that do not warrant the application of bail. Where this occurs and the perpetrator returns to school, the school's primary focus will be conducting an assessment of the risk the perpetrator poses to the victim or other pupils and staff at the school, both physically and in terms of trauma or emotional stress, and implementing any mitigating measures necessary to reduce the harm caused.
- 33.94 Where bail is deemed necessary, the school will work with CSCS and the police to safeguard children – ensuring that the victim can continue in their normal routine and continue to receive a suitable education.
- 33.95 The school will work with children's social care and the police to support the victim, alleged perpetrator and other pupils (especially witnesses) during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.
- 33.96 The school will liaise with police investigators to develop a balanced set of arrangements whereby both the alleged perpetrator and the victim can continue to receive a suitable education without compromising any ongoing investigations or the emotional state of the victim.
- 33.97 The school will not wait for the outcome (or even the start) of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made.
- 33.98 The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The end of the criminal process

- 33.99 Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same school as the victim, the school will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable.
- 33.100 The school and parents will ensure that the victim and perpetrator remain protected from bullying and harassment (including online).
- 33.101 Where an alleged perpetrator is found not guilty or a case is classed as requiring "no further action", the school will offer support to the victim and alleged perpetrator for as long as is necessary. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer support.
- 33.102 The headteacher will carefully consider, on a case-by-case basis, whether allowing the victim and the alleged perpetrator to share classes or attend the same activities is conducive to either party's effective education, and will implement alternative arrangements, in consultation with the DSL (and SENDCO where the victim or alleged perpetrator has SEND), where necessary.
- 33.103 The alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience.

Ongoing support for the victim

- 33.104 Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:
- The terminology the school uses to describe the victim
 - The age and developmental stage of the victim
 - The needs and wishes of the victim
 - Whether the victim wishes to continue in their normal routine
 - The victim will not be made to feel ashamed about making a report
 - What a proportionate response looks like
- 33.105 Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.
- 33.106 Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.
- 33.107 The school will provide a physical space for victims to withdraw to.
- 33.108 Victims may require support for a long period of time and the school will be prepared to offer long-term support in liaison with relevant agencies.
- 33.109 Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made.

33.110 If the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents.

33.111 If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.

Ongoing support for the alleged perpetrator

33.112 When considering the support required for an alleged perpetrator, the school will take into account:

- The terminology they use to describe the alleged perpetrator or perpetrator;
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support;
- The reasons why the alleged perpetrator may have abused the victim – and the support necessary;
- Their age and developmental stage;
- What a proportionate response looks like;
- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials;
- What the outcome of the investigation was.

33.113 When making a decision, advice will be taken from CSCS, specialist sexual violence services and the police as appropriate.

33.114 If the alleged perpetrator moves to another school (for any reason), the DSL will inform the destination school of any ongoing support needs and transfer the child protection file.

33.115 The school will work with professionals as required to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

Disciplining the alleged perpetrator

33.116 Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and imposing an appropriate penalty.

33.117 The school will make such decisions on a case-by-case basis, with the DSL and senior staff taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSCS will be consulted where necessary.

33.118 The school will also consider whether circumstances make it unreasonable or irrational for the school to make a decision about what happened while an investigation is considering the same facts.

33.119 Disciplinary action and support can take place at the same time.

33.120 The school will be clear whether action taken is disciplinary, supportive or both.

Shared classes

33.121 Once the DSL has decided to progress a report they, alongside senior staff, will again consider whether the victim and alleged perpetrator will be separated in classes, on

school premises and on school transport – balancing the school's duty to educate against its duty to safeguard. The best interests of the pupils will always come first.

- 33.122 Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.
- 33.123 Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other pupils.
- 33.124 Where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable sanctions and permanent exclusion. If the perpetrator will remain at the school, the school will keep the victim and perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.
- 33.125 Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.
- 33.126 In all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

Working with parents and carers

- 33.127 In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator alongside all relevant outside agencies. For cases of sexual harassment, these decisions will be made on a case-by-case basis.
- 33.128 The school will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.
- 33.129 Schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or Deputy DSL will attend such meetings, with other senior staff and agencies invited as necessary.
- 33.130 This policy (Safeguarding and Child Protection Policy 2023) which clearly sets out how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported is available to parents on the school's website. A hard copy is available on request.

Safeguarding other children

- 33.131 Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support.

- 33.132 It is likely that children will “take sides” following a report, and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.
- 33.133 The school will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.
- 33.134 As part of the school’s risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

34. Consensual and non-consensual sharing of indecent images and videos.

- 34.1 The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery), as a safeguarding concern and will treat them seriously.
- 34.2 ‘Youth-produced sexual imagery’ (YPSI) is defined as the illegal act of creating and distributing nude or semi-nude images, videos or livestreams by young people under the age of 18. The term ‘nudes’ is more commonly used by young people and covers most types of creating and sharing incidents.
- 34.3 The term ‘indecent imagery’ is the legal wording that refers to nude or semi-nude images or videos of anyone under the age of 18, although it can also refer to sexual posing or sexual violence.
- 34.4 ‘Sexting’ is used by many adults to encompass the broad array of YPSI, however many young people interpret ‘sexting’ as writing and sending explicit messages with another, rather than images or videos.
- 34.5 ‘Revenge porn’ is the creating and sharing of nude or semi-nude photos or videos of another person without their consent and the intention of causing distress or embarrassment. It is a criminal offence under the Criminal Justice and Courts Act 2015.
- 34.6 ‘Upskirting’ refers to the capturing of an image or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification or cause the victim humiliation, distress or alarm. It is a criminal offence under the Voyeurism Act 2019.
- 34.7 Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful.
- 34.8 Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour. Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.
- 34.9 Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed,

and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

- 34.10 Where a member of staff becomes aware of an incidence of sexting that involves indecent images of a pupil, they will refer this to the DSL as soon as possible. The DSL, or pastoral staff, will work to support the affected pupils and inform them of the reporting routes to remove a nude or semi-nude that has been shared online or to prevent an image from being shared online
- 34.11 Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:
- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
 - Tell the DSL immediately if they accidentally view an indecent image and seek support.
 - Explain to the pupil that the incident will need to be reported.
 - Respond positively to the pupil without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL or Deputy DSL.
 - Report the incident to the DSL or Deputy DSL.
- 34.12 The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution- they will categorise the incident into one of two categories:
- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of pupils, including where there is an adult involved, where there is an intent to harm the pupil depicted, or where the images are used recklessly.
 - **Experimental:** incidents involving the creation and distribution of indecent images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil.
- 34.13 Where it is necessary to view the imagery, e.g. if this is the only way to make a decision about whether to inform other agencies, the DSL should:
- Discuss this decision with the headteacher or another member of SLT.
 - Ensure the image is, where possible, viewed by someone of the same sex as the individual depicted.
 - Ensure viewing takes place on school premises and with another member of staff present in the room – this other staff member does not need to view the imagery.
 - Record on CPOMS, how and why the decision was made to view the imagery and who was present.
 - It may be unavoidable to not view the imagery if the pupil has presented the image directly to staff or if it was found on a school device or network.
- 34.14 Where the incident is categorised as ‘aggravated’, the situation will be managed in line with the school’s Child-on-child Abuse procedures which includes reporting to the police and CSCS.
- 34.15 Where the incident is categorised as ‘experimental’, the pupils involved are supported to understand the implications of sharing indecent imagery and to move forward from

the incident. The DSL will not refer to CSCS and/or the police if they are confident that the risks can be managed effectively by the school.

34.16 Where there is reason to believe that indecent imagery being circulated will cause harm to a pupil, the DSL will refer the incident to CSCS and the police. Where indecent imagery of a pupil has been shared publicly, the DSL will work with the pupil to report imagery to sites on which it has been shared and will reassure them of the support available.

34.17 The DSL and other relevant staff will support and guide the affected pupils through any process that is undertaken. They will avoid victim-blaming.

34.18 Affected parents will be supported including signposting and offering support on:

- Help on how to speak to and listen to their child about such incidents;
- How to deal with their emotions;
- How they can discuss issues around consent and trust in healthy relationships;
- Understanding the law around YPSI;
- Being kept up to date on any actions being taken;
- Resources to support their child.

34.19 If the DSL has decided no other stakeholders should be involved, consideration will be given to deleting the imagery and/or messages from devices and other services.

34.20 In most cases the pupil will be advised to delete the image and will be asked to confirm they have done so. They will be asked to delete all images on all devices, online storage or social media sites. All pupils involved will be informed that possession of the content is illegal and if they fail to delete the content they are committing an offence.

34.21 Where there is reason to believe that indecent imagery being circulated will cause harm to a pupil, the DSL will refer the incident to CSCS and the police. Where indecent imagery of a pupil has been shared publicly, the DSL will work with the pupil to report imagery to sites on which it has been shared and will reassure them of the support available.

35. Adult involved in youth-produced sexual imagery (YPSI).

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

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

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

- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

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

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

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

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

36. Communication and confidentiality

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

36.2 Where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents.

36.3 Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

36.4 Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.

36.5 During disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

36.6 Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim’s consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime.

36.7 Before doing so, the DSL will weigh the victim’s wishes against their duty to protect the victim and others.

- 36.8 Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.
- 36.9 Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved.
- 36.10 Discussions with parents will not take place where they could potentially put a pupil at risk of harm.
- 36.11 Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report.
- 36.12 Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, etc., with the reasons behind decisions being explained and the available support discussed.
- 36.13 External agencies will be invited to these discussions where necessary.
- 36.14 Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.
- 36.15 Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

37. Online safety

- 37.1 As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.
- 37.2 Through training, all staff members will be made aware of the following:
- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online
 - The procedure to follow when they have a concern regarding a pupil's online activity
- 37.3 Parents will receive regular information on how they can keep their children safe online through the school newsletter, website and learning conferences.
- 37.4 The school will ensure that suitable filtering systems are in place to prevent children accessing inappropriate material.
- 37.5 The school will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what pupils can be taught online.
- 37.6 The school will ensure that it meets the filtering and monitoring standards published by the DfE.
- 37.7 Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns when they are identified. Staff will also be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

- 37.8 Where pupils need to learn online from home, the school will support them to do so safely in line with the remote learning policy and government guidance at that time.

There is a separate Online Safety Policy.

38. Cyber - crime

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

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

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

39. Mobile phone and camera safety

- 39.1 Staff members will not use personal mobile phones or cameras in areas where pupils are present in school.
- 39.2 Staff may use mobile phones on school premises outside of working hours when no pupils are present.
- 39.3 Staff may use mobile phones in the staff areas during breaks and non-contact time.
- 39.4 Mobile phones will be safely stored and in silent mode whilst pupils are present.
- 39.5 Staff will use their professional judgement in emergency situations.
- 39.6 Staff will be provided with a school mobile phone to use on a trip or residential stay in an emergency or for contacting parents. Personal mobile phones can be taken on trips but they must only be used in emergencies and should not be used when pupils are present.
- 39.7 Members of staff will not use their personal mobile devices to take images or videos of pupils or staff.
- 39.8 The sending of inappropriate messages or images from mobile devices is strictly prohibited.
- 39.9 Staff who do not adhere to this policy will face disciplinary action.
- 39.10 ICT technicians review and authorise any downloadable apps or programmes that are to be used in school by staff and pupils.
- 39.11 Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school’s privacy notice and Data Protection Policy.
- 39.12 The person in charge of an event will oversee the planning of the event where photographs and videos will be taken.

- 39.13 Pupils on the “no photograph permission” list will not be included in published (internally or externally) photographs or videos. All staff can access this list. This list may include LAC pupils, adopted pupils, or pupils for whom there are security concerns.
- 39.14 The Designated Teacher will, in known cases of a pupil who is a LAC or who has been adopted, liaise with the pupil’s social worker, carers or adoptive parents to assess the needs and risks associated with the pupil.
- 39.15 Staff will report any concerns about another staff member’s use of mobile phones to the DSL, following the procedures outlined in this Policy (Safeguarding and Child Protection Policy 2022) and the ‘Allegations of Abuse Against Staff’ document.

Upskirting

- 39.16 Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting.
- 39.17 “Operating equipment” includes enabling, or securing, activation by another person without that person’s knowledge, e.g. a motion activated camera.
- 39.18 Any incidents of upskirting will be reported to the DSL who will then decide on the next steps to take, which may include police involvement.

40. Sports clubs, extracurricular activities and use of premises for non-school activities.

- 40.1 Clubs and extracurricular activities organised by the school and run by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.
- 40.2 Staff, including paid and volunteers, running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of pupils.
- 40.3 Staff, including paid and volunteers, understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.
- 40.4 Where The Corinium Education Trust hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe. The DfE’s guidance on keeping children safe in out-of-school settings should be used in these circumstances.
- 40.5 Where the local governing body provides the activities under the direct supervision or management of school staff, child protection arrangements will apply.
- 40.6 Where activities are provided separately by another body, this may not be the case; therefore, The Corinium Education Trust will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The Corinium Education Trust will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate.
- 40.7 The Corinium Education Trust will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

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

41. Safer recruitment

41.1 Cirencester Deer Park School has implemented a separate Safer Recruitment Policy to assist with recruitment and employee selection. It outlines the school's recruitment procedure and how the school ensures safer recruitment is considered at all levels of the recruitment process.

41.2 The safety and protection of the school's pupils is always at the forefront of the school's concerns, the Safer Recruitment Policy aims to embed a robust safeguarding culture into the recruitment practices of the school.

42. Single central record (SCR)

42.1 The school keeps an SCR which records all staff, including supply staff, teacher trainees on salaried routes and all others who work in regular contact with children in the school or college, including volunteers who work at the school.

42.2 All members of the proprietor body are also recorded on the SCR.

42.3 The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A section 128 check for those in management, trustee or governor positions
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

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

42.5 If any checks have been conducted for volunteers, this will also be recorded on the SCR.

42.6 If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

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

42.8 The Corinium Education Trust will keep separate SCRs for each academy.

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

43. Training

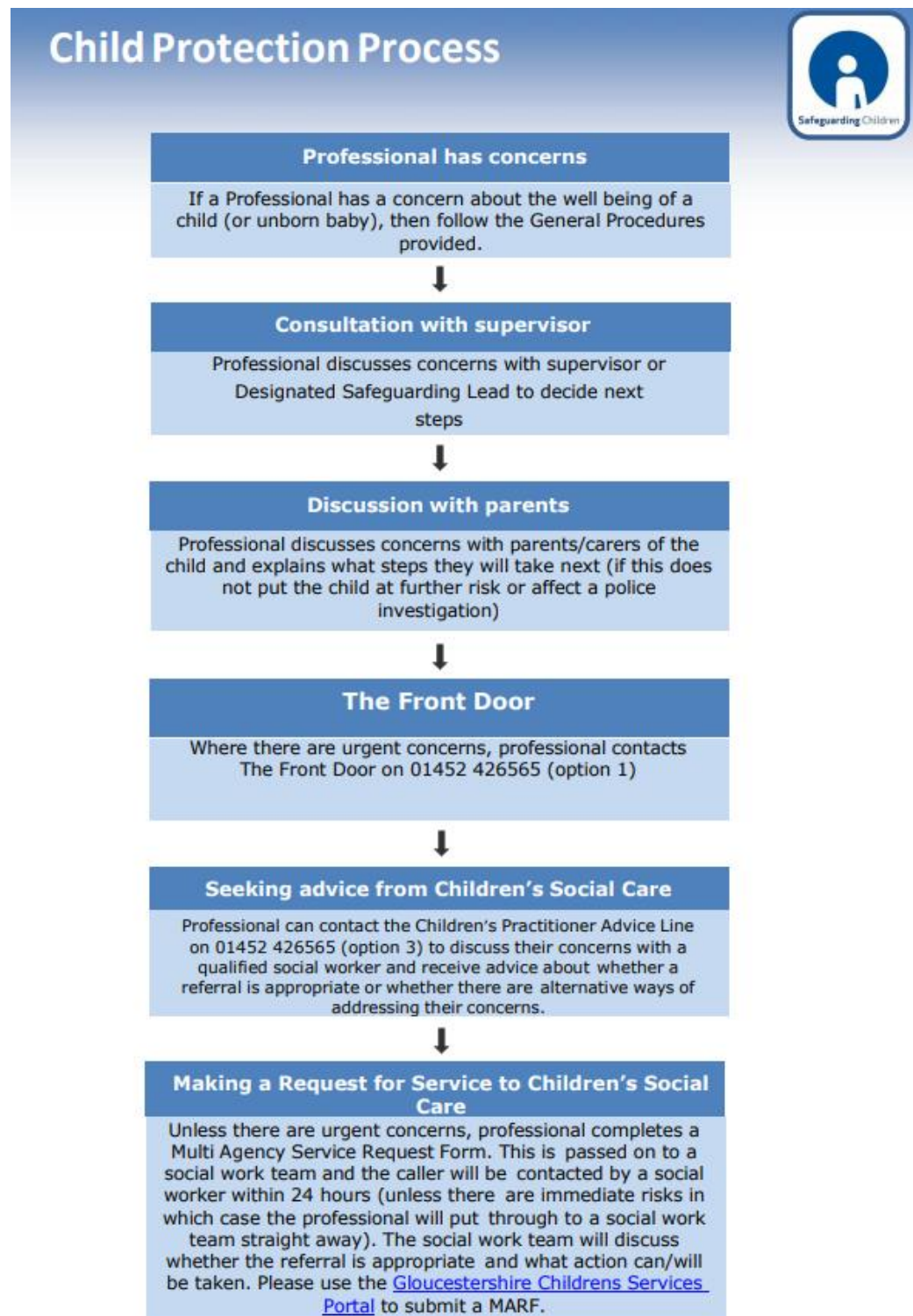
- 43.1 Staff members will undergo safeguarding and child protection training at induction, which will be regularly updated or whenever there is a change in legislation.
- 43.2 The induction training will cover:
- The Safeguarding and Child Protection Policy including child-on-child abuse procedures and response to children who go missing from education;
 - Part one and annex B of KCSIE 2023;
 - Appropriate child protection and safeguarding training, including online safety training- which amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring;
 - The Behaviour for Success Policy;
 - The Corinium Education Trust Code of Conduct;
 - The identity of the DSL and the deputy DSL
 - The role of the DSL and deputy DSL
- 43.3 All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Any changes to this policy will be communicated to staff. The annual training will include:
- The issues surrounding sexual violence and sexual harassment.
 - Contextual safeguarding.
 - How to keep LAC and PLAC safe.
 - CCE and the need to refer cases to the National Referral Mechanism.
 - Updated online safety training
- 43.4 All staff members will undergo Child Protection training from the LA every three years. The next date for LA training is November 2023.
- 43.5 Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.
- 43.6 The DSL and deputy DSL will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role. This should include training to understand:
- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
 - How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
 - The importance of providing information and support to CSCS.
 - The lasting impact that adversity and trauma can have.
 - How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
 - The importance of internal and external information sharing.
 - The Prevent duty.
 - The risks associated with online safety, including the additional risks faced online by pupils with SEND.

- 43.7 The DSL and Deputy DSL will also undergo Prevent awareness training which will enable them to understand and support the school with regards to the Prevent duty and equip them with the knowledge needed to advise staff. All staff will complete online Prevent training.
- 43.8 The DSL and Deputy DSL will undergo online safety training to help them recognise the additional risks that pupils with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support pupils with SEND to stay safe online.
- 43.9 Online safety training will also be conducted for all staff members as part of the overall safeguarding approach.

44. Monitoring and review

- 44.1 This policy is reviewed annually by the DSL, the Headteacher and Local Governing Body. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.
- 44.2 Any changes made to this policy by the DSL and Headteacher will be communicated to all members of staff.
- 44.3 All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.
- 44.4 The next scheduled review date for this policy is September 2024.

Appendix A: Safeguarding Reporting Process



Referrals to Social Care



Professional has made a referral to social care



Confirm in writing

If due to urgent concerns, a MARF was not completed at the time of the initial contact, then the referral must be followed up in writing within 48 hours
Childrenshelpdesk@gloucestershire.gov.uk
The Front Door, Block 4, 5th Floor, Shire Hall, Glos.
GL1 2TG



Assessment

If accepted the referral will lead to an Assessment being commenced to determine whether there is suspected actual harm or likely significant harm.



Strategy Discussion

The Strategy Discussion is convened by the appropriate Referral and Assessment team where there is suspected actual harm or likely significant harm (within 5 working days).



Section 17 Child in need of services

Section 17 services are required when there are health or development concerns. These are determined through an assessment of need and are appropriate when the child is judged not to be at risk of significant harm or any previous concerns have been resolved.



Section 47 Child in need of protection

A Section 47 enquiry is required because it is judged there is suspected actual harm or likely significant harm to the child. An assessment is carried out and it may be decided that Child Protection Conference is required, which should then be held within 15 working days.



Outcome of Assessment

The Assessment may confirm child protection concerns in which case a Child Protection Conference should be held within 15 working days of the last strategy discussion.
(It may also determine that services are required under Section 17).

Child Protection Conference Process



A Request for a Child Protection Conference has been made

The Strategy Discussion convened by the Social Care Team will decide if a child is judged to be at continued risk. The Child Protection Conference Team must be informed immediately if this is the case.



Initial Child Protection Conference

The multi-agency conference includes all professionals who are involved with the family and the children and young people themselves. Together it is decided whether a Child Protection Plan should be put in place.



No Child Protection Plan

The Child Protection Conference agrees that no Child Protection Plan is required but it may be that Section 17 services are required.



Child Protection Plan

The Child Protection Conference agrees that a Child Protection Plan is required.



Core Group

The Core Group meets after the Conference to follow through the Child Protection Plan lead by the child's Key Worker.



Review Child Protection Conference

Within three months of Initial Conference the Child Protection Conference Team convene this to review the progress of the CP Plan and decides whether to either:

To end the Child Protection Plan

This maybe that:

- the child protection issues are resolved,
- services maybe required under Section 17 or
- the child is protected through other procedures (looked after children)

so the CP Plan is no longer required.

or

To continue with a Child Protection Plan

The Child Protection Conference agrees that a Child Protection Plan continues to be required as there is suspected actual harm or likely significant harm.

The plan would then be reviewed every six months at a Review Child Protection Conference.

Appendix B: Contacts and Advice

Expert organisations

- [Barnardo's](#)
- [Lucy Faithfull Foundation](#)
- [NSPCC](#)
- [Rape Crisis](#)
- [University of Bedfordshire: Contextual Safeguarding](#)
- [UK Safer Internet Centre](#)

Support for victims

- [Anti-Bullying Alliance](#)
- [MoJ Victim Support](#)
- [Rape Crisis](#)
- [The Survivor's Trust](#)
- [Victim Support](#)

Toolkits

- [Brook](#)
- [NSPCC](#)
- [Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire](#)

Further information on confidentiality and information sharing

- [Gillick Competency Fraser Guidelines](#)
- [Government Information Sharing Advice](#)
- [Information Commissioner's Office: Education](#)
- [NSPCC: Things to Know and Consider](#)

Further information on sexting

- [UK Council for Child Internet Safety: Sexting Advice](#)
- [London Grid for Learning – Collection of Advice](#)

Support for parents

- [Parentzone](#)
- [Parentsafe – London Grid for Learning](#)
- [CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact](#)
- [CEOP Thinkuknow – Supporting Positive Sexual Behaviour](#)

Appendix C: Staff Disqualification Declaration

Name of school:	
Name of staff member:	Position:
Orders and other restrictions	Yes/No
Have any orders or other determinations related to childcare been made in respect of you?	
Have any orders or other determinations related to childcare been made in respect of a child in your care?	
Have any orders or other determinations been made which prevent you from being registered in relation to childcare, children's homes or fostering?	
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in Schedule 1 of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018?	
Are you barred from working with children by the DBS?	
Are you prohibited from teaching?	
Specified and statutory offences	
Have you ever been cautioned, reprimanded, given a warning for or convicted of:	
• Any offence against or involving a child?	
• Any violent or sexual offence against an adult?	
• Any offence under The Sexual Offences Act 2003?	
• Any other relevant offence?	
Have you ever been cautioned, reprimanded for or convicted of a similar offence in another country?	
Provision of information	
If you have answered yes to any of the questions above, provide details below. You may provide this information separately, but you must do so without delay.	
Details of the order restriction, conviction or caution:	
The date(s) of the above:	
The relevant court(s) or body/bodies:	
You should also provide a copy of the relevant order, caution, conviction, etc. In relation to cautions and/or convictions, a DBS certificate may be provided.	
Declaration	
In signing this form, I confirm that the information provided is true to the best of my knowledge and that: <ul style="list-style-type: none">• I understand my responsibilities to safeguard children.	

- I understand that I must notify the headteacher immediately of anything that affects my suitability to work within the school. This includes any cautions, warnings, convictions, orders or other determinations made in respect of me that would render me disqualified from working with children.

Signed:

Print name:

Date:

Document History

Creation Date	September 2015
School Lead	Designated Safeguarding Lead
Approved by	Local Governing Body
First approval date	September 2015
Review frequency	Annually
Last review/approval date	September 2023

Significant Amendments made by Designated Safeguarding Lead March 2024		
Section	Title	Changes
	Acronyms	AI added at the start
1.	Definitions	1.7 updated, 1.8 and 1.9 new
2.	Legal framework	Updated to include DfE 2024 Sharing nudes guidance
3.	Roles and responsibilities	3.1: bullet points 17-19 are new.
33	Child-on-child abuse	33.7 new
34	Consensual and non-consensual sharing of indecent images and videos	34.8 and 34.10 updated
35	Adult involved in youth-produced sexual imagery	New section