## St. John Paul II Multi Academy

# Safeguarding and Child Protection Policy

## Holy Cross Catholic Primary School

**September 2026**

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| **Date of last review** | December 2025 | **Review period** | Annual |
| **Date of next review** | September 2027 | **Owner** | CEO/Catholic Curriculum and Standards |
| **Type of policy** | Statutory | **Board approval** | September 2026 |

| Summary of changes | Date |
|---|---|
| P14 Reference to changes re EYFS volunteers<br>P20 Change to sexual abuse definition<br>P22 Include discriminatory behaviour, faith-based abuse to the definition of child-on-child abuse<br>Appendix 2 - the above definition added in as per updated KCSIE Sept 2026 and page numbers updated | 2/9/26 |
| P3 - Reference to new KCSIE 2026, EYFS guidance and reference to both Birmingham and Staffordshire<br>P4 - Reference to updated Data Acts in KCSIE 2026<br>P5 - Definitions updated in line with KCSIE 2026<br>P5-6 - Reference to Right Help, Right Time in Staffordshire and link included<br>P6 - 3 safeguarding partners - in line with KCSIE 2026<br>P7 - Extension of Equality Statement in line with KCSIE 2026<br>P7 - Section added Safeguarding requirements for sport and school premises<br>P8 - Updates to what staff will be aware of in line with KCSIE 2026<br>P10 - Schools to include specific safeguarding arrangements in the absence of DSL in line with KCSIE 2026<br>P11-12 Roles of Governors and Board updates in line with KCSIE 2026<br>P14 - Confidentiality updated to include further reference to proactive information sharing<br>P17-18 - Extension of risks in line with KCSIE 2026<br>P23 - Updated mental health in line with KCSIE 2026<br>P28 - Section added Immediate danger, significant harm and action when the DSL/DDSL is unavailable<br>P28 - Section removed - What will Children's Social Care do?<br>P30-32 - Reference to Generative AI included<br>P33 - Section 11 updated to include medical conditions<br>P34 - Children in Care changed to Looked after and previously looked after children<br>P35 - Young carers section added<br>P35 - Gender questioning updated as per KCSIE 2026<br>P36-37 - Changes from BCSP to LA procedures<br>P39 - Reference to SJP2 Allegations against staff policy<br>P42 - Update to training in line with KCSIE 2026<br>P48 - Change from 'missing in education' to 'absent from education'<br>P51 - Temporary accommodation notification duty added<br>P55 - Harmful sexual behaviour, sexual harassment and sexual violence between children updated<br>P61 - Visitor protocols included in line with KCSIE 2026<br>P65 - Contact details for Staffordshire Children's Safeguarding Partnership included<br>P66 - Reference to Staffordshire's Safeguarding arrangements | 17/7/26 |
| P.31 - CEO to be informed of any LADO referrals | 15.12.25 |

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## 1. Aims

St. John Paul II Multi-Academy is committed to creating a culture of belonging to ensure all children feel valued and respected to live out their vocation. We believe that all children must be enabled to express their wishes and feelings and talk about anything that is of importance to them. We believe that every child deserves to receive an education within an environment where they feel safe to learn and develop. We want our pupils, staff, parents and carers to have confidence and trust in our goals and know that collaborative working and collective responsibility is fundamental to maintaining a child-centred approach to safeguarding.

The schools in the St John Paul II Multi-Academy aim to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- A culture of vigilance whilst maintaining a child-centred approach
- Children are taught to recognise when they are at risk and how to get help when they need it

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Academy trust governance guide. It should be read alongside What to do if you're worried a child is being abused: advice for practitioners and, where applicable, section 3 of the Early Years Foundation Stage statutory framework. The school will have regard to this guidance, comply with its legal duties, and follow the arrangements agreed and published by the three local safeguarding partners in Birmingham and Staffordshire Local Authorities, as appropriate.

This policy is also based on the following legislation:

- Part 3 of the schedule to The Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes the duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage
- Working collaboratively as professionals is a key part of providing services to children and families. When professional disputes happen that cannot be resolved in a timely manner the BSCP Resolution and Escalation Protocol should be followed.
- DfE Information Sharing Advice For Practitioners 2024, outlines the importance of sharing information about children, young people, and their families in order to safeguard children. It provides clarity on when and how information can be shared legally and professionally to achieve improved outcomes.
- The Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act 2025, referred to collectively in this policy as "data protection laws".
- The School Attendance (Pupil Registration) (England) Regulations 2024, including requirements relating to deletion from the admission register and returns to the local authority.
- The School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, including requirements relating to toilets, changing accommodation and showers.
- The Crime and Policing Act 2026, which removes the supervision exemption from regulated activity for relevant volunteer activity.

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils/students
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques

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

## 3. Definitions

**Safeguarding and promoting the welfare of children** means:

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

**Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

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

**Making or sharing nudes and semi-nudes** refers to the creation, sending or posting of nude or semi-nude images by children under the age of 18. Images include photographs, videos and livestreams. Images may be self-generated, taken by another person, digitally altered or wholly generated using artificial intelligence, including deepfakes or "deep nudes". All incidents require a safeguarding response, whether the making or sharing is consensual or non-consensual.

**Children** includes everyone under the age of 18.

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

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

**Family Help** means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. It brings together universal, targeted and statutory support to improve outcomes for children and families.

Right Help, Right Time Birmingham and Staffordshire guidance documents advise what support is available whatever the needs are of children, young people and their families. They are the framework and practice guide on how all individuals, agencies, partners and practitioners work together in Birmingham and Staffordshire.

**Child in Need** is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare**.** This now sits within the wider Family Help framework before statutory intervention

**Children's Advice and Support Service (CASS)** provides a single point of contact for professionals and members of the public who want to seek support or raise concerns about a child.

**Multi Agency Safeguarding Hub** (MASH) is a fully integrated multi-agency team which involves key safeguarding agencies including professionals from social care, police, health and education who work together to identify the need of children and their families and signpost to the appropriate agency or resources where threshold is met.

**Children in Care** is a child that is 'looked after' (in care) if they are in the care of the Local Authority for more than 24 hours. Children can be in care by agreement with parents or by order of a court.

**Kinship Care** refers to a type of care where a child who cannot be looked after by their birth parents is cared for by relatives or friends.

**Data protection laws** refer collectively to the Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025. These laws do not prevent, or limit, the sharing of information where it is necessary to safeguard and promote the welfare of children.

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

- The Local Authority (LA)
- Integrated Care Boards (previously Clinical Commissioning Groups) for an area within the LA
- The Chief Officer of Police for a police area in the LA area

## 4. Equality statement

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

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- Are pregnant and/or are parents themselves.
- Have exhibited early signs of abusive, violent and/or harmful behaviour.
- Are repeatedly removed from classrooms, on a part-time timetable, have experienced multiple suspensions, are at risk of permanent exclusion, or attend alternative provision or a pupil referral unit.
- Have caring responsibilities as young carers.
- Have medical conditions, including allergies, which may increase vulnerability where essential information, medication or care is not provided.

**4.1 Safeguarding requirements for sport and school premises**

Sport: where a sport is separated by sex for safety or fairness in accordance with the Equality Act 2010, participation will be organised by biological sex. Where there are no safety concerns and a child requests an alternative arrangement, the school will consider the request in the child's best interests, the interests of other children and the need for safe and fair participation.

Toilets: schools must not allow children to use toilets designated for the opposite biological sex. Separate toilets will be provided for boys and girls aged eight and over unless each toilet is in an individual room lockable from the inside for one user. Alternative individual facilities may be considered without compromising single-sex provision or anyone's safety, comfort, privacy or dignity. Arrangements will be recorded, communicated appropriately and reviewed regularly.

Changing rooms and showers: a child aged 11 or over at the start of the school year must not undress in front of a child of the opposite biological sex and must not use changing or shower facilities designated for the opposite sex. Alternative private arrangements or access at a different time may be considered, without compromising single-sex provision or anyone's safety, comfort, privacy or dignity. Arrangements will be recorded and reviewed.

Boarding/residential accommodation and trips (where applicable): children will not share overnight accommodation designated for or shared with children of the opposite biological sex. Alternative

arrangements will be sought where necessary without compromising any child's safety, comfort, privacy or dignity.

## 5. Roles and responsibilities

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

The St John Paul II Multi-Academy and school play a crucial role in preventative education. This is in the context of an academy-wide approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour and other forms of physical violence and conflict. Our approach will be inclusive, evidence-based, age-appropriate and stage of development appropriate, including for children with SEND and other vulnerabilities. This will be underpinned by the school's:

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

**The Local Context**

Holy Cross Catholic Primary School is a small Catholic primary school serving approximately 210 pupils in Walmley, Sutton Coldfield (B76 2SD). The area is predominantly residential, with pupils travelling to school by car, walking, cycling, scooting and public transport, and the school community is becoming increasingly diverse.

Crime levels in the local area are relatively low compared with other parts of Birmingham. However, staff should remain aware of local concerns including violence and sexual offences, anti-social behaviour, criminal damage, theft, burglary, vehicle crime and drug-related offences. These wider community issues can impact children and families and should inform our professional curiosity, particularly around changes in behaviour, attendance, vulnerability, exploitation, online safety and children's experiences outside school.

Staff are encouraged to use the local context alongside their knowledge of individual children and families to ensure that safeguarding remains proactive and that concerns are recognised, listened to and acted upon promptly.

**5.1 All staff**

All staff will be required to:

- Read and understand Part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Attend and participate in safeguarding and child protection training, including online safety, at induction; regularly updated training; and safeguarding updates as required and at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance via Every
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents/carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are lesbian, gay, bisexual, trans or gender questioning to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this safeguarding and child protection policy, including this policy and the procedures for low-level concerns and allegations against staff, the Staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the school's individual behaviour policy, online safety policy and the multi-academy's safeguarding response to children who go missing from education/who are absent from education
- The local arrangements for universal services and community-based early help, and the targeted early help level of Family Help, including the local criteria and levels of need, the process for assessments and the role staff may be expected to play in identifying concerns, sharing information, supporting assessments or acting as a lead practitioner where appropriately qualified.
- The criteria and processes for referral to local authority children's social care and for statutory services under sections 17, 20, 31 and 47 of the Children Act 1989, including the role staff may be expected to play following a referral.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- That abuse, neglect, exploitation and safeguarding issues are rarely standalone events; multiple risks may overlap, including modern slavery, financial exploitation, stalking, teenage relationship abuse and extra-familial harm.
- That child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator; it is preventable; early, evidence-based support can reduce the risk of further harmful behaviour; and abuse may include serious physical assault, threats involving weapons, harmful sexual behaviour, harassment or violence.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as:

- child-on-child abuse,
- child sexual exploitation (CSE),
- child criminal exploitation (CCE),
- Modern Slavery
- indicators of being at risk from or involved with serious violent crime,
- Domestic Abuse
- FGM,
- Forced Marriage
- Radicalisation
- and serious violence (including that linked to county lines)

- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children and young people can be at risk of harm inside and outside of their home, at school and online.
- That children may not feel ready or know how to disclose abuse, neglect or exploitation, may not recognise their experiences as harmful, or may communicate concerns indirectly. Staff must maintain professional curiosity and act on concerns immediately.
- What to look for to identify children and young people who need help or protection and the additional barriers that some children may face in recognising or reporting harm, including because of disability, SEND, communication needs, language, sexual orientation or other vulnerabilities
- Section 18 of this policy outlines in more detail how staff are trained and supported to fulfil these responsibilities.

**5.2 The designated safeguarding lead (DSL)**

The DSL is a member of the senior leadership team. We may refer to the DSL as the 'Lead DSL'. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online. When the DSL is absent, the Deputy DSLs will act as cover. Our DSL teams are all trained to the same level to ensure that at all times one or more of them are available to carry out all of their designated functions in safeguarding. The DSL teams across all multi-academy schools can be found listed in **Appendix 3.**

During term time, the DSL or a Deputy DSL will always be available during school hours for staff to discuss safeguarding concerns. Staff can contact the DSL team via the school's agreed safeguarding communication channels, including the school telephone and secure email.

To ensure continuity of safeguarding arrangements, each school will have robust cover arrangements in place whenever the DSL is unavailable due to illness, leave or other circumstances. If a DSL is absent due to illness or leave, other members of the Designated Safeguarding Team will be available to respond to safeguarding concerns. Enquiry and the Inclusion inboxes are monitored regularly, including during school holidays and breaks to ensure any immediate concerns are identified and addressed promptly.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Assess and respond to risks of serious violence, including weapon carrying or threats, putting in place safety and support plans and considering de-escalation of peer conflict where appropriate.
- Respond where a potential victim of child criminal exploitation, child sexual exploitation, trafficking or modern slavery is identified, by making an immediate child protection referral to local authority children's social care and, where appropriate, the police. The DSL will work with the relevant statutory agency to ensure that a referral to the National Referral Mechanism is considered and, where appropriate, submitted by an authorised First Responder organisation.
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at their school
- Make sure that staff have appropriate Prevent training and induction

The DSL will also:

- Keep the Executive Principal/Principal informed of any issues (if the DSL isn't the Principal or Executive Principal).
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Will allow access to local-authority children's social care from the host local authority and, where appropriate, a placing local authority, to conduct or consider whether to conduct an assessment under section 17 or section 47 of the Children Act 1989.

The full responsibilities of the DSL and Deputy DSLs are set out in their job description as set out by the DfE in Annex B of the current version of Keeping Children Safe in Education. The school will review the job description regularly and update it whenever required.

**5.3 The Board of Directors and Local Governing Bodies**

The Board of Directors will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place

in schools are effective and support the delivery of a robust whole- school approach to safeguarding. Their training should be regularly updated.

The Local Governing Body has overall responsibility for ensuring that there are sufficient measures in place to safeguard the children in their establishment. It is recommended that a nominated governor for child protection is appointed to take lead responsibility.

See **Appendix 3** for the nominated governor and director for safeguarding and child protection. The Board of Directors and Local Governing Body will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development, and that all systems, processes and policies operate with the best interests of the child at their heart.
- Ensure that the school complies with Keeping Children Safe in Education 2026, all relevant safeguarding legislation and statutory guidance, and the locally agreed multi-agency safeguarding arrangements.
- Evaluate and approve this policy at each review, ensure it is reviewed at least annually and updated whenever necessary, and hold the Executive Principal/Principal to account for its effective implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010, including the Public Sector Equality Duty, data protection laws, and the school's local multi-agency safeguarding arrangements.
- Appoint a senior board level (or equivalent) lead Governor to monitor the effectiveness of this policy and, in conjunction with the full Governing board, to take strategic leadership responsibility for the school's safeguarding arrangements. This person will be different from the DSL.
- Ensure that the DSL has the appropriate status, authority, skills and experience, together with sufficient time, funding, training, resources and support, and that robust and confidential cover arrangements are in place whenever the DSL is unavailable.
- Ensure all staff receive appropriate safeguarding and child protection training, including online safety and filtering and monitoring, at induction; that this training is regularly updated; and that staff receive safeguarding updates as required and at least annually.
- Ensure all Governors and Directors receive appropriate safeguarding and child protection training, including online safety, at induction and that this training is updated regularly so they can provide strategic challenge and assurance.
- Ensure that appropriate safeguarding policies and procedures are in place, including arrangements for child-on-child abuse, children absent from education, online safety, staff conduct, low-level concerns, allegations against staff, whistleblowing and safer recruitment.
- Ensure that the school has appropriate and effective filtering and monitoring. This includes:
- Ensuring that roles and responsibilities are clearly assigned, and that their effectiveness is reviewed at least once in every academic year by the responsible senior leader with support from the DSL and IT support, including recorded checks across relevant devices and locations
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

- Ensure that the school complies with Part three of Keeping Children Safe in Education 2026 in relation to safer recruitment, selection, vetting, regulated activity, the single central record and ongoing safeguarding. This includes implementing the removal of the supervision exemption so that a person, including a volunteer, who teaches, trains, instructs or supervises children on more than three days in a 30-day period or overnight is treated as being in regulated activity even where supervised, and is subject to the legally required checks.
- In schools subject to the EYFS framework, no volunteer will begin work in an EYFS setting until the school has received their enhanced DBS certificate, including children's barred-list information. A standalone barred-list check does not permit the volunteer to begin EYFS work while the enhanced DBS certificate is awaited.
- Ensure that procedures are in place to manage any safeguarding concern or allegation, no matter how small, about staff, supply staff, trainee teachers, volunteers or contractors, including concerns that may meet the harm threshold and low-level concerns that do not.
- Ensure that the CEO with the support of the Chair of Governors acts as the case manager, where an allegation is made against the Executive Principal/Principal, and, where required, liaises with the local authority designated officer (LADO).
- Ensure that where another body provides services or activities, or uses the school premises, appropriate safeguarding assurance is obtained, safeguarding requirements are included in any agreement, and failure to comply may result in termination of the arrangement.
- Ensure that safeguarding arrangements for alternative provision are effective, including written assurance about checks, accurate records of where each child is educated, regular review of placements and immediate review where safeguarding concerns arise.
- Ensure that online safety is a running and interrelated theme within the whole-school approach to safeguarding, including the safe use of generative artificial intelligence, mobile phones, remote education, information security and cyber security.
- Ensure that the school's policies and practice reflect the requirements of Keeping Children Safe in Education 2026 relating to children potentially at greater risk of harm, including children with SEND or medical conditions, young carers, children who are lesbian, gay or bisexual, and children who are questioning their gender.
- Ensure that appropriate arrangements are in place regarding sport, toilets, changing rooms, showers and, where applicable, boarding or residential accommodation, in accordance with statutory requirements and the safeguarding provisions in Keeping Children Safe in Education 2026.
- Ensure that referrals are made to the Disclosure and Barring Service and, where appropriate, the Teaching Regulation Agency when the relevant legal criteria are met.
- Ensure that child protection files are maintained, transferred securely and promptly, and that relevant safeguarding information is shared lawfully, proportionately and in a timely manner.
- Ensure that, where reasonably possible, more than one emergency contact number is held for each pupil/student.

All Directors and Governors will read Keeping Children Safe in Education in its entirety.

**5.4 The CEO, Principal and Executive Principals will:**

The CEO, Principals and Executive Principals are responsible for the implementation of this policy, including:

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

**5.5 Virtual School Heads and Designated Teachers**

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker. They also have a non-statutory responsibility to promote the educational achievement of children in kinship care. VSHs should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

Our Designated Teachers take leadership of promoting the educational attainment of Children With a Social Worker and will work closely with (VSHs) to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans

They carry out their duties in line with Designated teacher for looked-after and previously looked-after children - GOV.UK and extended duties as outlined Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK working closely with our DSL for those children who are supported by a Child in Need or Child Protection Plan to ensure support for the education attainment of these children is appropriately entwined with safeguarding processes.

## 6. Confidentiality

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools. All staff in schools, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly children's social care and the police. If a child wishes to confide in a member of staff/volunteer and requests that the information is kept secret, the member of staff/volunteer will tell the child, in an appropriate manner to the individual needs of the child, that they cannot promise confidentiality and may need to pass the information on to help keep the child or other children safe.

Staff/volunteers who receive information about children and their families in the course of their work should share that information within the expectations of the St John Paul II Multi-Academy Data

Protection policy and other relevant policies e.g., the safeguarding and child protection policy, inter-agency procedures.

Timely information sharing is essential to effective safeguarding.

Staff should be proactive in sharing information at the earliest appropriate opportunity to enable concerns to be identified, assessed and responded to before risks escalate.

When deciding what information should be shared, staff will ensure that information is:

- relevant to the current safeguarding concern or level of risk;
- necessary for the receiving person or agency to know in order to safeguard the child;
- proportionate, sharing only information required for safeguarding purposes; and
- clearly presented and appropriately contextualised so that the receiving agency can understand the significance of the information.

Professional judgement will always be exercised to ensure that information sharing is focused, proportionate and supports effective safeguarding. Care will be taken not to omit information that may be relevant to understanding or managing safeguarding risk.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children.

Data protection laws do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

When a child transfers to another school or education setting, the DSL will ensure that the child protection file is transferred securely and in accordance with statutory guidance.

In addition to the child protection file, the DSL will consider whether it is appropriate to share safeguarding information in advance of transfer where this would support the receiving setting to understand, assess and manage any ongoing safeguarding risks. This may include information relating to:

- children who have or have previously had a social worker;
- Child Protection or Child in Need arrangements;
- harmful sexual behaviour or child-on-child abuse;
- serious violence or weapon-related concerns;
- criminal or sexual exploitation;
- Prevent or Channel involvement;
- existing safety, support or risk management plans.

Where information indicates that there may be a risk to the child or to others, the receiving school should be enabled to undertake an appropriate safeguarding risk assessment and implement any necessary

safety or support arrangements before, or immediately upon, the child's arrival. Where appropriate, the DSLs of both settings should hold a professional discussion to support effective transition.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests. If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead, or Deputy DSL, in their absence.

St John Paul II Multi-Academy recognises the forthcoming statutory Information Sharing Duty introduced through the Data (Use and Access) Act 2025, which is intended to strengthen practitioners' confidence in sharing information appropriately and in a timely manner to safeguard children. We will continue to follow current statutory guidance and will review this policy as further government guidance is published.

## 7. Working with families

Alongside Keeping Children Safe in Education, St John Paul II adopts the fundamental principle of ***working in a child-centred approach within a whole family focus*** as promoted in Working Together to Safeguard Children. This principle is underpinned by the findings and recommendations within the Government's 2023 publication Stable Homes, Built on Love in response to the recommendations of the Independent Review of Children's Social Care.

We endeavour to work in partnership and collaboration with children and their families so that they are supported from an early stage by being a part of and leading the conversations about change and aims for their children. We are keen to support families in a strength and solution-based approach, encouraging motivation and confidence to improve their own agency to make safe and positive decisions for themselves and their children.

Our principles include, but are not limited to:

**Promoting effective partnership working with parents and carers** e.g. build strong, positive, trusting, and co-operative relationships by:

- Approaching families and their wider family networks and communities with empathy, respect, compassion, and creativity
- Avoiding reinforcing family shame, suffering, and blame
- making efforts to understand the impact of the parental trauma influencing the dynamics and experiences of the family
- Using strength-based approaches, working with parents and carers to identify what is working well and how their strengths could support them to effect positive change
- Ensuring we work sensitively with parents, carers, and children, to identify and understand the impact of adversity and trauma in their lives; seeking to understand how adversity and trauma might manifest and affect children and parent's engagement and use their expertise to adapt their response with care and compassion
- Adapting our responses to meet the diverse needs of parents and carers, including fathers and male carers, and the specific challenges being faced, including parents and carers of disabled children, and where harm is outside the home
- Ensuring we understand the family's background, ethnicity, religion, financial situation, ability, education, sex, ages and sexual orientation, and potential barriers these create in seeking and accessing help and support
- Being alert and recognising where parents or carers may not be acting in the best interest of the child or where children may be experiencing abuse, neglect, and exploitation as a result of actions

by parents, carers, or other individuals in their lives. Practitioners use their skills and expertise to adapt their response to secure engagement
- Being mindful of negative stereotypes when making decisions which might lead to false assumptions.

**Empowering our parents and carers** to participate in decision-making to help, support and protect children by:

- Creating a safe culture which is an open and accepting forum free from discriminatory or prejudicial judgements
- Ensuring the open culture is one which still provides reflection and challenge where the information has the potential to be a risk or influencing factor which may impact on a child's safety and wellbeing
- Asking families for their perspective on a situation or issue that arises, ensuring we consider their point of view and factor this in when thinking about support
- Promote families' rights to support through use of advocates, family members or a supporter
- Ensuring parents and carers are fully aware of who will attend meetings and discussions, if the child will be invited to participate, and the format of the meeting or discussion
- Giving parents and carers adequate preparation at every stage, relevant information, a safe and appropriate environment for participation, and suitable access arrangements
- Signposting parents and carers to sources of help and support available locally or through the Local Authority
- Provide opportunities for feedback and review to ensure acknowledgement of positive progress but also reviewing and discussion of any new or increasing issues to readapt a family's plans
- Being transparent about our concerns and why we may need to request support from an outside agency; and the potential actions should our concerns increase for the children
- Helping parents and carers to understand what the issues are and how these impact on the child, what decisions could be made, what changes need to be made, why and how, timescales and possible outcomes
- Providing information about different types of support, what it involves and expects from parents and carers so they can make an informed choice and decision about which support pathways will be more helpful and effective for them.

## 8. Recognising abuse and taking action

**Abuse, neglect and exploitation**

All our staff are aware of what abuse, neglect and exploitation and modern slavery and have an understanding of the different types of indicators as outlined in **Appendix 2** which could suggest a child is suffering or likely to suffer harm.

We encourage our staff to be professionally curious about what to look out for as this is vital for the early identification of abuse, neglect and exploitation so that we are able to identify children who may be in need of help or protection at the earliest opportunity.

Staff will recognise that risks may occur inside or outside the home or school and online; may overlap; and may include extra-familial harm, teenage relationship abuse (including physical, sexual and emotional abuse and stalking), financial exploitation, serious violence and child-to-parent or caregiver abuse. Staff

will remain alert to children who may benefit from universal services, community-based early help, targeted Family Help or statutory intervention including any child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- has a mental health need, including concerns relating to self-harm, an eating disorder, suicidal ideation or suicide risk;
- Is a young carer
- Is pregnant and/or is a parent;
- Is bereaved, living in temporary accommodation, returning home from care, or otherwise experiencing circumstances that may increase vulnerability; or
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion, or attends alternative provision or a pupil referral unit;
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education

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

All staff will recognise that prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination, may constitute a safeguarding concern in its own right. Staff will remain alert to its signs and impact and will report and respond to concerns in accordance with this policy.

Our staff are aware that children may be abused by an adult or adults or by another child or children.

**Physical Abuse**

Physical abuse is a form of abuse which may involve:

- hitting

- shaking
- throwing
- poisoning
- burning or scalding
- drowning
- suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (Fabricated Induced Illness FII).

**Emotional Abuse**

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

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

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It can be difficult to recognise emotional abuse and children may not always realise they are experiencing it. However, there may be indicators in the way a child behaves and reacts to certain situations.

**Sexual Abuse**

Sexual abuse involves forcing, causing or inciting a child or young person to take part in sexual activities, whether or not violence is involved and whether or not the child is aware of what is happening.

Sexual abuse may involve:

- Physical contact, including penetration using a part of a person's body or an object, such as rape or assault by penetration, and non-penetrative acts such as masturbation, kissing, rubbing and touching over clothing.
- Non-contact activities, including involving children in viewing or producing sexual images, making children watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.
- Online activity. Sexual abuse can take place online as well as offline, and technology may be used to facilitate abuse occurring offline.

Sexual abuse is not committed only by adult males. Women and other children can also commit sexual abuse. Children may be sexually abused within their family, an institution or the wider community and are more likely to know their abuser than not.

The sexual abuse of children by other children is a specific safeguarding concern in education. All staff must be aware of this risk and understand the school's procedures for preventing, reporting and responding to child-on-child abuse.

A child under the age of 13 can never provide legally valid consent to sexual activity. Sexual activity with a child under the age of 16 is an offence, regardless of whether the child appeared to agree to or participate willingly in that activity.

**Neglect**

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

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Exploitation**

Exploitation in relation to children refers to the use of children for someone else's advantage, gratification, or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.

Our staff are aware that there are several types of child exploitation, including, but not limited to:

- **Child Sexual Exploitation (CSE):** this is a type of sexual abuse where children are sexually exploited for money, power, or status. It can involve contact and non-contact activities and can occur without the child's immediate recognition; this is due to their grooming by the abuser.

- **Child Labour Exploitation:** this involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential, and dignity.

- **Child Trafficking:** children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities.

- **Child Criminal Exploitation (CCE):** this is where children are involved in activities of a criminal nature, often in gangs. They may be forced or manipulated into committing crimes, such as selling drugs or stealing.

**8.1 Safeguarding Issues and Specific Forms of Abuse**

All our staff understand that children can be at risk of abuse or exploitation in situations outside their families. They are aware that extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), drug taking and/or alcohol misuse, criminal exploitation, child sexual exploitation, serious youth violence, county lines, radicalisation, consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth produced sexual imagery) and can put children in danger.

Staff are aware that Extra Familial Harms can present online, in a child's environment/neighbourhood, school and any place/space that children occupy or access such as:

- Child abduction
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Children and the Court system
- Children absent from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Preventing radicalisation
- The Prevent Duty
- Channel
- Sexual violence and Sexual harassment between children in schools
- Serious Violence
- FGM and the mandatory reporting duty for teachers
- Forced marriage.

**Child-on-Child Abuse**

Staff will recognise that racism, faith-targeted abuse and other discriminatory behaviour can significantly affect a child's welfare, wellbeing and sense of safety. Such behaviour will be considered within safeguarding practice where appropriate.

At St John Paul II Multi-Academy, we know that children can cause harm to other children. As a Multi-Academy, we have a zero acceptance of child-on-child abuse and create a culture of keeping an open mind and attitude that "it could happen here." Our staff are aware that even if no reports are being made in our school, it does not mean it is not happening.

Our staff understand that it is important to challenge inappropriate behaviours between children that are abusive in nature, and we have clear expectations that incidents are not downplayed or suggested to be

jovial or part of growing up as this can lead to a culture of unacceptable behaviours and unsafe environments for children and young people. St John Paul II Multi-Academy will promote an inclusive, anti-discriminatory culture in which racism and other discriminatory behaviour are recognised, challenged and addressed as part of its safeguarding responsibilities.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- serious physical assault and harm, or the threat of a harm with a weapon
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents

**Domestic Abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. They may also experience it within their own intimate relationships.

Our staff understand that these experiences can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

Our staff are aware that domestic abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse and that anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

**Female Genital Mutilation (FGM)**

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

FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as 'female genital cutting,' 'circumcision' or 'initiation.'

**Our teachers** are aware of their mandatory reporting duty and the requirement to immediately contact the Police if they are

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

The duty for teachers above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, teachers know they must report to the DSL who will follow local safeguarding procedures.

Our members of staff who are not teachers, are aware that if they suspect a child is at risk or that FGM has been carried out, they should report this to the DSL immediately.

**Prevent and concerns about extremism**

St John Paul II is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of our functions, to have "*due regard to the need to prevent people from becoming terrorists or supporting terrorism*" (known as the Prevent duty).

The Prevent duty is one of our wider safeguarding obligations. Our DSLs and senior leaders are aware of the revised Prevent duty guidance: England and Wales (2023) for England and Wales, especially paragraphs 141-210, which focus on education and childcare. The guidance covers 3 general themes: leadership and partnership, capabilities, and reducing permissive environments.

**Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, which aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in (1) or (2)

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to Children's Services or Channel, the Government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which all staff and governors can call to raise concerns about extremism for a pupil. In non-emergency situations DSLs can also email counter.extremism@education.gov.uk. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

**Concerns about mental health**

Mental health problems may develop into safeguarding concerns, including self-harm, eating disorders, suicidal ideation or risk of suicide, and may also indicate that a child has suffered or is at risk of abuse, neglect or exploitation.

Only appropriately trained professionals should diagnose a mental health condition. Staff are nevertheless well placed to identify potential warning signs, including significant changes in behaviour, persistent difficulty sleeping, withdrawal from social situations, loss of interest in usual activities, physical signs of self-harm or self-neglect.

Staff will promote wellbeing, identify concerns early and ensure that any intervention offered by the school is evidence-based, safe, effective and appropriate to the child's needs and phase of education.

If a mental health concern is also a safeguarding concern, staff must record it and speak to the DSL or a deputy immediately, following section 7.4. The DSL or deputy will consider whether informing parents or carers would support the child's wellbeing and whether doing so would place the child at additional risk.

If staff believe a child is in immediate danger, they must call 999 or arrange for the child to attend A&E immediately with a parent/carer or another suitable person. If urgent mental health help is needed but the situation is not an emergency, staff should use NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is not also a safeguarding concern, speak to the Designated Senior Mental Health Lead (see Appendix 3). Mental health concerns should also be recorded on CPOMS.

**What all staff need to do to take action if abuse, neglect and exploitation is suspected or been disclosed.**

**Concerns about child-on-child abuse**

We recognise that children can abuse other children inside and outside school and online. Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. It is preventable, and timely evidence-based support may prevent further abuse or violence. Abuse will never be tolerated, normalised or passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys". In most circumstances, incidents of pupils hurting other pupils will be dealt with under individual school's behaviour policy. Our safeguarding and child protection policy will apply to all incidents that raise safeguarding concerns where the alleged behaviour:

- is serious, and potentially a criminal offence
- could put pupils in the school at risk
- is violent

- involves a threat of harm with a weapon, carrying a weapon or using a weapon
- involves pupils being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes, images that are digitally altered or wholly generated using AI)

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

- Staff must record the allegation on CPOMS and report to the DSL, staff should not investigate the matter
- The DSL will assess and consider the relevant next steps which may include, speaking with the child and parents, accessing relevant consultation lines provided to schools by the Local Authority, making a request for support to Children's Services as well as the Police if the allegation involves a potential criminal offence or the Child and Adolescent Mental Health Service (CAMHS), if appropriate
- Harmful sexual behaviour (HSB) may occur online, face to face or both and will always be considered within a child-protection context. When assessing behaviour, the DSL will consider the children's ages and developmental stages; the nature, frequency and pattern of the behaviour; any difference in age, power or developmental ability; coercion, intimidation or lack of consent; disability and vulnerability; the impact on the victim and others; and whether the behaviour may indicate the child displaying it has experienced abuse, trauma, unmet needs or exposure to abusive material.
- The DSL will consider whether a risk assessment or a safety and support plan would be beneficial for any children involved, including the victim(s), the child(ren) against whom the allegation has been made and any others affected, with a named person they can talk to if needed. This should include consideration of all aspects and areas of the school environment and beyond, for example off-site activities and school transport
- The DSL will speak to the child and their parent/s or carers to share the concerns, gain their views and consent to liaise with other agencies if there are any identified risks and unmet needs
- If the incident is a criminal offence, the school has a duty to report this and thereafter work closely with the Police (and other agencies as required) while protecting children and/or taking any measures to manage risk. For incidences which involve significant harm and/or a potential criminal offence, the DSL will endeavour to gain consent but may override this should not gaining consent increase the risk to a child
- Our DSLs are committed to ensuring that where concerns are raised about child-on-child abuse, incidences are taken seriously and dealt with fairly. DSLs will consider all information available to them and ensure that any action or decision is proportionate for all children involved, and that such decisions do not disproportionately impact on their access to education, although at times some restrictions or adaptations may be required to manage identified risk.

**8.2 Creating a culture where children feel safe in school and minimising the risk of all forms of abuse.**

We recognise the importance of taking proactive action to minimise the risk of any form of abuse, neglect and exploitation irrespective of from whom and where this comes from, including child-on-child abuse.

Creating a supportive environment where children can feel confident in reporting incidents is key to our safeguarding culture at St John Paul II.

We expect all staff to:

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

Our staff are trained to understand:

- How to recognise the signs of child-on-child abuse, and know how to identify it and respond to reports
- Even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an open mind and attitude of "it could happen here"
- If they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told; and always speak to the DSL should they be unclear
- Children may not always make a direct disclosure and therefore they must be aware that:
    - Children can show signs or act in ways they hope adults will notice and react to; it may be that their difficulties emerge from behaviour when they do not have the language to express themselves
    - A friend of the child may share information to a staff member or make comments; professionally curiosity is key, do not fear exploring the information and asking open ended questions
    - Staff overhear a conversation between children
    - A child's behaviour may change suddenly with no clear reason or precipitating event that might offer some explanation

- Some children can face additional barriers to telling someone, for example they have a disability, special educational need, age, gender, ethnicity and/or sexual orientation etc.
- One child's concerning/abusive behaviour towards another could be an indicator of that child having harmed themselves.

**8.3 If a child makes a disclosure to a member of staff or volunteer**

All staff are aware they should always be prepared as children can disclose spontaneously to anyone anywhere.

The schools of St John Paul II are situated within Birmingham which has a rich and diverse population. We cannot, and do not, assume that all children and their families have the ability, understanding, language and resilience to convey any difficulties they may experience. It is key to our Multi-Academy ethos to recognise the needs of children and their families and to recognise and provide support where English may not be their first language and/or the children or family members have special educational needs; and without doing so may impede their ability to represent their voice, wishes and feelings.

All staff know that we place the voice of children at the centre of everything we do and endeavour to place their best interests at heart. We ensure we know who our children are, staff are encouraged to be curious by speaking and listening to children whilst respecting any protected characteristics. We hope our children have confidence and trust in our staff, believing they will be taken seriously and be supported with their issues or concerns sensitively.

Staff also know that children may not always feel ready or know how to tell someone that they are being abused, neglected or exploited and do not always recognise their experiences as harmful.

We listen to children by:

- Showing patience regardless of a child's age as we know they can find it hard to find the words to express themselves
- Encouraging children to tell their story in their own words
- Avoiding the use of leading questions or suggesting what may have happened, instead we maintain genuine curiosity, and only ask open-ended questions / prompts.

We reassure children by:

- Making sure a child does not feel they are in trouble and that they have done the right thing in speaking to staff
- We let a child know it is not their fault as children are often made to feel blamed by those harming them
- Never promising confidentiality and being transparent about our obligations to share information if we are concerned that they are at risk of harm
- Helping children to understand how we plan to support them and their family and let them know what action we will need to take next to support them.

**8.4 Recording concerns**

Our staff know that reporting concerns is a procedural requirement when safeguarding and promoting the welfare of children. Our staff are clear that they must:

- Record all conversations relating to any level of concerns on our recording system, CPOMS; ensuring that the record is as detailed as possible, is factual, does not contain assumptions or personal judgement and captures the child's account in their own words
- Inform the DSL about their concern as soon as possible; where the concern involves a disclosure or concern that the child is at risk of harm they must inform the DSL immediately.

Our staff are aware that such information is confidential and should be shared with the DSL only who may hold additional information about the child and their family and therefore can form a view on its significance and whether any action is required. Staff will not share information amongst themselves and will not share the information outside of the formal reporting process unless asked to by the DSL. This ensures that information is shared without delay enabling the DSL to carry out any necessary functions of their role whilst upholding confidentiality for the child and their family.

**8.5 What school staff should do if they have concerns about a child**

St John Paul II Multi-Academy is committed to ensuring that all children feel safe and comfortable to share and report any concerns and/or allegations about their personal experiences at home, in the community, online or regarding a member of staff or other children in the school. As outlined above, all our staff are clear on the importance of listening to and supporting children when making disclosures, and the need to reassure them.

Our staff are aware that children can share information with anyone in our school but there are clear reporting processes when such information sharing raises concern about their welfare. Children may talk about worries and anxieties around friendships and school life which they need to support with but on other occasions they may share information about their family life which indicates that the children and their family may be in need of help and/or fear or experiences which cause staff to be concerned about whether they have been harmed or are at risk of being harmed. Where such a situation arises, our staff are clear on the reporting processes.

Any member of staff, including supply teachers, contract workers, volunteers, governors/directors and visitors at St John Paul II Multi-Academy, who has any concerns about a child's welfare should:

- Maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the best interests of the child. Never promise a child confidentiality
- Reassure the child they have done nothing wrong and if appropriate explain to them how they will be supported and who you will need to share information with
- Record what the child or others have disclosed using their language - or describe what you have seen or suspect and your rationale for this. Also ensure you make a note of any injuries observed or described by the child (*if it is the latter two*)
- Consider if the child needs medical attention and if so, prioritise ensuring they receive this

- You must never delay reporting your concerns about the welfare of a child and always act immediately by reporting/speaking to the school's DSL/deputies

- Record what the child or other has disclosed in their language or describe what you have seen or suspect and your rationale for this (*if it is the latter two*)

The DSL or Deputy DSL will:

- Use the Right Help, Right Time guidance to initially assess the concerns raised and consider the impact on the child's welfare, at the same time their safety. They will also review the child's record in order to establish if there has been any previous concerns (records help to establish relevant history and risk factors for example even if a concern appears low level on the surface, a series of incidents can highlight patterns of ongoing abuse and neglect.) The DSL will use the Continuum of Need to support their analysis and rationale for any decision

- DSL or Deputy DSL will speak to the child to verify their wishes and feelings, contact the child's parents or carers to either inform them of the concerns and also to gauge their view (it will be at the discretion of the DSL team to carefully consider if this action may place a child at further risk, e.g. if the child has disclosed abuse and neglect caused in the family home)

- If it is immediately apparent that a child has suffered significant harm or is at risk of harm e.g. suffered abuse, neglect and/or exploitation, the school's DSL will make a referral to Children's Social Care to request support at the earliest opportunity; consent will be gained where appropriate. If there has been a crime committed within the circumstances of the abuse, they will also report this to the Police.

**Immediate danger, significant harm and action when the DSL/DDSL is unavailable:**

- If you believe a child is in immediate danger or is suffering, or is likely to suffer, significant harm, make an immediate referral to local authority children's social care and, where appropriate, the police. Call 999 where there is an immediate risk to life or safety. Anyone can make a referral.

- If the DSL or a deputy is unavailable in any other safeguarding situation, this must not delay appropriate action. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care, take action proportionate to the concern, and inform the DSL or deputy as soon as practicably possible.

**8.7 Making a referral to Children's Services and/or requesting support**

**<u>What children and young People need to know and do to report safeguarding concerns (abuse neglect and exploitation)</u>**

At St John Paul II Multi-Academy we cultivate a culture of openness and transparency and want to make it clear to all our pupils/students that we are available at any time to listen to you and will always take your concerns seriously, however small you may consider them to be.

Our pledge is:

- We will ensure we provide you with the space away from public areas for you to talk

- We will listen without judgement and endeavour to respect your wishes and feelings

- We want you to feel safe and we will be honest about our duty to prioritise your wellbeing and longer-term safety, this means, depending on the circumstances, we cannot offer you total confidentiality. We understand that this may create uncertainty, but we are confident that often when matters are dealt with as they emerge the longer-term prospects can be much improved for you and your family

- We will respect your place but if we consider that you have suffered significant harm or are at risk of harm, we will need to share this information so that you and your family can be offered the right support. We will be clear on what information needs to be shared, with whom and how it might be used

- When the concerns suggest you may benefit from family help support this may include considering support to your parents and carers with matters that will improve your situation

- We will provide a named mentor for you so that you can have the confidence and trust to know that you have someone to go to at school if you are feeling vulnerable and experiencing difficulties

- Your education and welfare is important to us and we want to reassure you that your experience at school remains positive and you feel safe.

What you can do to report concerns:

- You can speak to any member of staff of your choice. Those staff will listen and support you but we have a team of DSLs in our school who have a specific role to support children and therefore it is likely that the staff members will talk to them or arrange for you to.

If you are being abused, neglected or exploited you can call Children's Services **(the details are in Appendix 3)**

If you are in immediate danger and/or think a crime has/is being committed, you can call the Police on **999.**

You can contact the NSPCC Helpline by calling 0808 800 5000 or email: help@nspcc.org.uk

**8.8 Risk management and safety planning**

The DSL, with support from Deputy DSL, will take the lead role in managing any proposed risk by the alleged perpetrator(s) and will provide support at the same time, it is not our intention to villainise children, but it is everyone's responsibility to uphold the school's Behaviour Policy and standards within the school to maintain a safe environment. Such assessments or plans will be robust but sensitive to the individual needs of the children to ensure any identified risk is managed as effectively as possible whilst also supporting them to continue accessing a satisfactory level of education.

Risk management strategies can be put in place while other investigations are going on, e.g. by the Police. Although another agency such as the Police or Children's Services is or has investigated an incident, it is our duty to ensure we identify and implement our own assessment and management of the concerns, informed by the needs of our school and the children we care for and the advice and outcomes of those

agency's actions. This is to ensure that all children and staff are supported and always protected. We will consider these matters on a case-by-case basis, considering whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the Police and/or Children's Services to determine this
- There are circumstances that make it unreasonable or inappropriate for us to reach our own view about what happened while an independent investigation is ongoing.

## 9. Online safety and the use of mobile technology

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

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community to be safe and responsibly use technology, including mobile and smart technology
- Maintain mobile phone-free school environments by default. Pupils will not have access to their mobile phones throughout the school day, including during lessons, movement between lessons, breaktimes and lunchtimes. Any exception will be considered individually and permitted only where there is a clear and justified need, such as a medical requirement or reasonable adjustment, in accordance with the individual school's Mobile Phone Policy.
- Establish clear mechanisms to identify, intervene in, and escalate any incidents or concerns, where appropriate.

Our approach to online safety is based on addressing the following 4 categories of risk as identified in the latest version of Keeping Children Safe in Education:

**Content** – being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

**Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

**Conduct** – online behaviour that increases the likelihood of, or causes harm, for example: making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images, including those generated using AI and online bullying; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

To meet our aims and address the risks above, we will educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- Ensuring children know not to meet up with a person they have met online without a safe adult
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.

We will also:

- Train staff, as part of their induction, on how to keep themselves safe online as well as children, in line with the school's online safety policy This needs to include issues for example: cyber-bullying, the risks of online radicalisation, the safeguarding risks associated with artificial intelligence and generative AI, AI-generated or digitally altered images, harmful or simulated interactions with AI applications, and the roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required at least once each academic year
- Educate parents/carers about online safety through letters and emails sent directly to them. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their personal mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras.

  Please see individual school policies for their specific procedures.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that appropriate staff designated by the Executive Principal or Principal, have the power to search pupil's phones, as set out in the DfE's guidance on searching, screening and confiscation if there is a concern regarding a child's safety or a crime in which case the Police will be contacted
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment and audit that considers and reflects the risks faced by our school community
- Protect personal information and maintain appropriate cyber-security, information-security and access-management controls in line with DfE cyber-security standards for schools and colleges.
- Ensure the SLT member responsible for filtering and monitoring, supported by the DSL and IT support, reviews effectiveness at least once each academic year; checks filtering on all internet-

connected devices in all relevant locations; records those checks; and ensures identified concerns are escalated.

- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about individual school's policies in these areas, please refer to their online safety and device user agreement policy.

**9.1 Generative Artificial Intelligence (AI)**

Generative Artificial Intelligence (AI) tools are now widely available and easily accessible. Staff, pupils and parents/carers may be familiar with generative AI tools such as ChatGPT, Google Gemini and other AI-powered platforms.

St John Paul II Multi-Academy recognises that generative AI can support teaching, learning and administrative tasks and may also assist in identifying and responding to safeguarding concerns. However, AI also presents safeguarding risks and may be used to facilitate abuse, including bullying, harassment, online grooming, impersonation, fraud and the creation of realistic AI-generated images, audio or video ('deepfakes'), including AI-generated nude or semi-nude images.

Any misuse of AI that places a child at risk of harm or involves abusive, harmful or illegal content will be managed in accordance with this Safeguarding and Child Protection Policy, the Behaviour Policy, the Anti-Bullying Policy and, where appropriate, reported to external agencies.

Staff must exercise professional judgement when using AI tools and remain accountable for all work, decisions and communications supported by AI. Confidential, personal or safeguarding information must not be entered into publicly available AI platforms unless the platform has been approved by the Multi-Academy and appropriate data protection safeguards are in place. Staff should ensure that any AI-generated content is reviewed for accuracy, suitability and potential bias before it is used.

The Multi-Academy's filtering and monitoring systems apply to the use of AI technologies in accordance with *Keeping Children Safe in Education*. Where AI-generated indecent images or AI-generated nude or semi-nude images involving children are identified or shared, the Multi-Academy will respond in line with UK Council for Internet Safety (UKCIS) guidance *Sharing nudes and semi-nudes: advice for education settings working with children and young people* and this Safeguarding and Child Protection Policy.

## 10. Notifying parents or carers

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

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

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

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

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

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

## 11. Pupils with special educational needs, disabilities or health/medical conditions

Children with SEND or certain medical or physical health conditions may face additional risks because they may not understand that what is happening is abuse; may require intimate care; may be isolated from others; or may be more dependent on adults for care. St John Paul II Multi-Academy schools will ensure appropriate communication support is in place and will not attribute indicators to a child's condition without further exploration.

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being able to understand the consequences of doing so

We offer extra support for these pupils which is adapted to the pupils' individual needs. Any abuse involving pupils with SEND will require close liaison with the DSL (or Deputy DSL) and the SENCO.

**Safeguarding children with medical conditions**

An incident involving the management of a medical condition, including an allergy, does not automatically require a safeguarding referral. A referral will be considered where the incident indicates increased risk of neglect, abuse or exploitation, for example where essential medical information is withheld or a child

is repeatedly sent to school without essential medication, placing them at risk. The school will follow statutory guidance on supporting pupils with medical conditions and allergy safety.

## 12. Pupils with a social worker

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

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

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

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

## 13. Looked after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of local authority children's social workers and relevant virtual school heads
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

Where a pupil is a care leaver, the DSL will hold the contact details of the local-authority Personal Adviser appointed to support the young person and will liaise with the Personal Adviser where concerns affect the pupil's safety, welfare, education or training.

## 14. Young carers

St John Paul II Multi-Academy schools will be alert to the needs of young carers and recognise the potential effect of caring responsibilities on attendance, attainment, behaviour and wellbeing. We will identify young carers early and coordinate timely internal and external support, including from local authority and health services where appropriate.

## 15. Pupils who are lesbian, gay, bisexual or gender questioning

Being lesbian, gay or bisexual is not itself a risk factor for harm. However, children who are, or are perceived by others to be, lesbian, gay or bisexual may be vulnerable to discriminatory bullying. St John Paul II Multi-Academy schools will take a strong, proactive approach to preventing and responding to all such bullying, including applying appropriate sanctions.

Children who are questioning their gender: St John Paul II Multi-Academy schools will not initiate action relating to social transition. It will respond only where a child or parent/carer raises a request for support. Staff will take time to understand the child's thoughts and feelings, exercise appropriate professional curiosity about the full range of the child's experiences, remain alert to wider vulnerabilities including bullying, family or peer relationships, mental health and psychosocial needs, health issues or neurodiversity, and avoid rigid rules based on gender stereotypes.

No member of staff will adopt a change relating to social transition unless a decision has been made by the St John Paul II Multi-Academy schools following careful individual consideration and the child's parents or carers have been involved, except in the rare circumstances where involving them would create a greater safeguarding risk. The decision-making process will consider the child's age and maturity, wishes and best interests; safeguarding and wider needs; the views of parents/carers; any available clinical evidence or advice; relevant non-clinical professional advice, including from the DSL and SENCO where appropriate; the effect on other children; and duties under the Equality Act 2010 and Human Rights Act 1998.

Parents and carers have the leading role and will be engaged as a priority. Their views will carry great weight and be properly considered. Where a child confides feelings but does not request changes, confidentiality will not be broken unless the conversation raises a related concern about the child's wellbeing or safety, in which case normal safeguarding procedures will be followed.

The St John Paul II Multi-Academy schools recognise social transition as an active intervention and will take a very careful approach. Primary schools will exercise particular caution. Any agreed arrangement will be recorded clearly, communicated only to those who need to know, kept under regular review and adjusted where necessary in the child's and other children's best interests.

The rules in section 4.1 above on sport, toilets, changing rooms, showers and boarding or residential accommodation will be followed. Children will not be permitted to use facilities, accommodation or safety-based single-sex sport designated for the opposite biological sex. Where appropriate, safe and dignified alternative arrangements may be considered without compromising single-sex provision, safety, fairness, comfort, privacy or dignity.

## 16. Alternative provision

Where the St John Paul II schools commission alternative provision, it remains responsible for safeguarding the pupil. It will complete due diligence, obtain written confirmation of appropriate safeguarding checks, require the provider to notify it of staff changes or any arrangements that may place the child at risk, and maintain accurate records of the address of the principal provider, any subcontracted provision and every satellite site the pupil may attend.

The school will review attendance, safety, suitability and whether the placement continues to meet the pupil's needs at least half-termly. Any safeguarding concern will trigger an immediate review and, where necessary, suspension or termination of the placement unless or until the concern has been satisfactorily addressed.

The school will have regard to DfE alternative provision guidance and voluntary national standards, but will not rely solely on any local register or approval process.

## 17. Restrictive interventions and reasonable force

Staff may use reasonable force only where lawful and necessary, using no more force than is necessary for the least amount of time. The decision is based on professional judgement and individual circumstances. The school will not adopt a "no contact" policy that prevents staff from safeguarding pupils. For pupils with SEND, mental health needs or medical conditions, staff will consider additional vulnerability, reasonable adjustments and proactive individual support plans in line with DfE restrictive-intervention guidance.

## 18. Complaints and concerns about school safeguarding policies

Section 11 of the 2004 Children's Act places an expectation on our Multi-Academy to have a clear policy in line with LA guidance for dealing with allegations against staff who work with children. All staff based within our Multi-Academy will be considered to be in either a position of trust or working with children.

A 'position of trust' is one in which a teacher or other member of staff/volunteer is in a position of power or influence over a child, by virtue of the work or nature of activity being undertaken. The Sexual Offences Act 2003 (ss.16-24) and/or Crown Prosecution Service Website sets out detailed definitions and a range of criminal offences associated with abuse of such a position.

A person aged 18 or over is said to be in a position of trust in relation to students at the school if they:

- Look after children at the school. "Looking after" is defined as regularly involved in caring for, training, supervising or being in sole charge of such persons
- A professional who has power and authority in a child's life and may have a key influence on their future is regarded as being in a 'position of trust'
- Such a person will have regular contact with the child and may be acting in loco parentis.

The Police, Crime, Sentences and Court Act (August 2022) extended the roles which fall into the definition of 'Position of Trust' within the Sexual Offences Act (2003). The new legislation makes it an offence for anyone who coaches, teaches, trains, supervises or instructs a child under 18, on a regular basis, in a sport or a religion to engage in inappropriate relationships with those children/young people.

On receipt of any information which raises a concern about any of our staff, the Headteacher, or Chair of Governor, will consider whether the information suggests it is the following:

**Allegation** is a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The threshold for an allegation that is considered by the LADO is wider than those in which there is reasonable cause to suspect a child is suffering, or likely to suffer, harm. The LADO threshold is, in respect of all people working or volunteering with children in a position of trust, where they have:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Any information or concern which meets the above threshold should be referred to the LADO service prior to the school taking any action.

**Concern about the Quality of Care/Practice** is an accusation, not of a child protection nature, that the care/practice provided to a child does not meet the standards expected and is about the level of value provided by any care/practice resource, as determined by some measurement. As with quality in other fields, it is an assessment of whether something is good enough and whether it is suitable for its purpose.

These types of concerns should be addressed internally using performance management processes.

**Complaint** is a statement that something is unsatisfactory or unacceptable. A concern may be defined as 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought.' A complaint therefore can be defined as 'an expression of dissatisfaction however made, about actions taken or a lack of action.'

These issues must be addressed through internal complaints policy and procedures.

When concerns/allegations meet the harm threshold St John Paul II Multi-Academy schools are required to comply with both Part Four of KCSiE and appropriate Local Authority procedures.

All staff and volunteers are required to immediately report any level of concerns about behaviour and/or conduct of adult (including supply teachers and trainee teachers) working/volunteering with children towards a child to leadership and management. This includes reporting adults who are providing out of school activities/leasing facilities.

**18.1 What happens next**

The Executive Principal/Principal/Chair of Governors may undertake initial inquiries to gather key information. They will assess whether the allegation meets the LADO threshold, if it does they will make a referral to LADO giving consideration to our staff code of conduct, managing allegations policy and appropriate Local Authority procedures. If necessary, they will complete a LADO referral within one working day. **Any referrals made to the LADO must be reported to the CEO.**
If the allegation does not meet the harm threshold for LADO, the Executive Principal/Principal/Chair of Governors will follow the St John Paul II Multi-Academy Staff Code of Conduct.

**Role of LADO**

- **Case management** - oversee the process and ensure it is working, not to investigate.
- **Consultation** - provide advice and guidance to employers and voluntary organisations.
- **Monitoring** - the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.
- **Liaison** -with the Police, Children's Services and other partner agencies (managers of the subject of allegation).

**Role of school's Case Manager,** includes:

- clarify facts of the concerns/allegation (not investigate) before contacting the LADO

- take part in Strategy Meetings to liaise with other partner agencies
- undertake internal planned inquiries/fact finding
- take part to review the progress of the case in which there is a Police officer investigation
- operate a thorough disciplinary process when appropriate
- ensure a properly managed conclusion and outcome to process.

**LADO Principles and Response**

**Timeliness** - any allegation of abuse must be dealt with fairly, quickly and consistently in accordance with the safeguarding and child protection procedures, this is best practice to provide immediate safety for child/ren and make safe arrangements for the person who is the subject of the allegation. It is crucial that employers **make a referral to LADO within one working day**.

**Objectivity** - it is not permissible for a member of staff to conduct (though their involvement may still be required) an enquiry about suspicion or allegation of abuse with respect to a:

- Relative
- Friend
- Colleague, supervisor/supervisee or someone who has worked with her/him previously in any of these capacities

If, following the conclusion of child protection processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses.

**Confidentiality** - information about an allegation must be restricted to those who have a need to know in order to:

- Protect children
- Facilitate enquiries
- Avoid victimisation
- Safeguard the rights of the person about whom the allegation has been made and others who might be affected
- Manage disciplinary/complaints aspects.

A media strategy should be developed with no improper or inadvertent releases of information to the media, in accordance with the Association of Chief Police Officers (ACPO) guidance (now known as The National Police Chiefs' Council (NPCC)

**18.2 Concerns that DO NOT meet the harm threshold - Low-Level Concerns (LLC)**

All schools follow the St John Paul II Multi-Academy Allegations against staffing and Low Level Concerns policy when dealing with low-level concerns. The term low-level does not seek to minimise the seriousness of any concerns, the term low-level indicates that it is a concern that is lower than the LADO threshold, but they are still practice concerns that need to be considered with a safeguarding lens and require suitable action through internal procedures of the school. It is important these are managed robustly as a repeated low-level concern or a pattern of concerns which may not meet the LADO threshold individually may together indicate a concern about the person's suitability and potential risk to children in the capacity of their role.

At St John Paul II Multi-Academy schools, leadership manage LLC using our school's internal due process, if we consider a member of staff has breached our school's code of conduct, depending on the seriousness and impact on a child, we will also liaise with our human resource service:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level safeguarding concerns
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping identify any weakness in the school's or college's safeguarding system.

Concerns may arise from a range of scenarios, e.g. suspicion; complaint or disclosure made by a child, parent or other adult within or outside of the organisation or as a result of vetting checks undertaken.

All staff should know that in line with our school's culture we encourage staff to have the confidence and trust to confide in leadership if they have concerns about adults working or volunteering with children.

We share information responsibly and understand this is on a need-to-know basis. We apply our protocols for recording and storing information confidentially.

We encourage an open and transparent culture, to identify concerning, problematic or inappropriate behaviour early so that we are able to minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and in accordance with the ethos and values of the institution.

The role of our school's case manager and the principles for managing LLC is the same as set out above, parallel to what is set out within the section where concerns meet harm threshold, for example the principles and practice.

If we are uncertain of threshold criteria for either LADO referral or LLC we consult with the multi-academy's HR, the CEO and the LADO. At St John Paul II we have clear codes of conduct and processes in place to deal with any concerns or allegations which do not meet the LADO threshold. Such concerns may arise from suspicion, complaint, safeguarding concerns, or allegation from another member of staff, disclosure made by a child, parent or another outside of the school or pre-employment vetting checks.

**18.3 After-school clubs, community activities and tuition: safeguarding guidance for providers**

St John Paul II schools have a legal duty of care to ensure we maintain a safe environment for children. If we receive an allegation or concern relating to an incident that has happened when an outside individual or organisation are using our school premises, we will ensure that we follow our school's safeguarding and child protection procedures, which includes reporting allegations to the LADO, Children's Social Care and Police if a crime has been committed.

It is the role of the individual school's governing body to ensure any organisation that hires the school premises is compliant with the guidance set out in Out-of-school settings: safeguarding guidance for

providers - GOV.UK In particular we have embedded within our lease agreement with external organisations the standards and expectations for them to provide evidence and assurance of their safeguarding and child protection procedures.

**18.4 Other complaints**

If any of our stakeholders are not satisfied with any aspects of how we implement and comply with safeguarding policies and procedures, the St John Paul II Multi-Academy Complaints Procedures can be found on our website here.

**18.5 Whistleblowing**

At St John Paul II we strive to create a culture of openness, trust and transparency to encourage all staff to confidentially share any concerns they have about poor or unsafe practice, concerns or allegations against staff or the school's safeguarding practice and arrangements so they can be addressed appropriately.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding procedures and arrangements.

**Examples where Whistleblowing may apply:**

- Pupil's or staff member's health and safety are being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Attempts to cover up the above, or any other wrongdoing that is in the public/school interest
- Do not delay! Your concerns should be taken seriously and investigated, and your confidentiality respected
- You should report your concern to the Executive Principal/Principal/other member of staff on the SLT, and if concerns are about the Executive Principal/Principal, report to the Chair of the Governing Board.

If, for any reason, there are difficulties with following the above procedure, you can whistle blow directly to Children's Services and/or the Police on 999, or to the NSPCC Whistleblowing Helpline 0800 028 0285 help@nspcc.org.uk

## 19. Record-keeping

We will hold records in line with our records retention schedule.

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

Records will include:

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

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

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school, in accordance with the Data Retention Policy and KCSIE.

**19.1 Receiving in and transferring pupil records to other education provision**

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

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

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

The DSL will obtain and retain confirmation that the child-protection file has been received securely by the new setting.

Where information indicates a risk to the child or to others, including previous carrying, threatening with or use of a knife or weapon, the receiving setting will assess risk and put a safety and support plan in place. Wherever practicable, DSLs will discuss the transfer directly.

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

**19.2 Retention, archiving and destruction of records**

For records that are not transferred to another school, for example the child leaves the country or is going to be home educated, we have:

- A clear retention policy
- Secure and appropriate system to archive with restricted access
- We have a written assurance from our providers of our electronic recording systems that all records are maintained securely which includes any archived records.

Storage, retention, and destruction of our child protection files is also made clear in our data management policy.

## 20. Training

**20.1 All staff**

Safeguarding and child protection training will be based on the requirements and expectations of the current version of Keeping Children Safe in Education, relevant statutory guidance, local safeguarding-partner arrangements and the school's safeguarding context. Training will equip staff to understand and discharge their responsibilities, recognise and respond to emerging and established safeguarding risks, and apply the St John Paul II Multi-Academy and school policies and procedures effectively in practice.

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-trust safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils

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

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

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

Volunteers will receive appropriate training, if applicable.

Staff will be provided with appropriate opportunities to contribute to and shape the Multi-Academy's safeguarding arrangements and the development and review of this policy.

**20.2 The DSL and Deputy DSLs**

The DSL and Deputy DSLs will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

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

**20.3 Directors and Governors**

All Directors and Governors receive training about safeguarding and child protection (including online safety) at induction, which is annually updated. This is to make sure that they:

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

As the Chair of the Board or Chair of Governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against an Executive Principal or Principal, they receive training in managing allegations for this purpose.

**20.4 Recruitment – interview panels**

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

**20.5 Staff who have contact with pupils and families**

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

## 21. Monitoring arrangements

This policy will be reviewed annually and whenever changes in legislation, statutory guidance, local safeguarding arrangements, emerging risks or lessons learned require it, by the multi-academy's CEO and Safeguarding Lead in conjunction with the Safeguarding Director and school leadership teams, including DSLs. At every review, it will be approved by the full Board of Directors.

## 22. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff Code of Conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Data Protection
- Mobile devices/acceptable use
- Equality
- EYFS (Primary schools only)
- Relationships and sex education
- First aid
- Curriculum

- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistleblowing
- Artificial Intelligence
- Allegations against staff including low level concerns
- Restrictive Interventions

## Appendix 1: Types of Abuse

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

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

**Sexual abuse** involves forcing, causing or inciting a child or young person to take part in sexual activities, whether or not violence is involved and whether or not the child is aware of what is happening.

Sexual abuse may involve:

- Physical contact, including penetration using a part of a person's body or an object, such as rape or assault by penetration, and non-penetrative acts such as masturbation, kissing, rubbing and touching over clothing.
- Non-contact activities, including involving children in viewing or producing sexual images, making children watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.
- Online activity. Sexual abuse can take place online as well as offline, and technology may be used to facilitate abuse occurring offline.

Sexual abuse is not committed only by adult males. Women and other children can also commit sexual abuse. Children may be sexually abused within their family, an institution or the wider community and are more likely to know their abuser than not.

The sexual abuse of children by other children is a specific safeguarding concern in education. All staff must be aware of this risk and understand the school's procedures for preventing, reporting and responding to child-on-child abuse.

A child under the age of 13 can never provide legally valid consent to sexual activity. Sexual activity with a child under the age of 16 is an offence, regardless of whether the child appeared to agree to or participate willingly in that activity.

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

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

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

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Appendix 2: Specific Safeguarding Concerns

**Assessing adult-involved nude and semi-nude sharing incidents**

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

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

**Sexually motivated incidents**

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

To make initial contact, the offender may present as themselves or use a false identify on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chat rooms or on gaming platforms and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where

a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

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

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

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

**Financially motivated incidents**

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them. Throughout 2022 and 2023, there has been a considerable increase in reporting of these incidents.

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

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

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

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

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

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

**Children who are absent from education**

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

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

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

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

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

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an

immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

**Child criminal exploitation**

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

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

**Child sexual exploitation**

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

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

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

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

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

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

**Child-on-child abuse**

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

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents
- Abuse in intimate personal relationships between peers (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual making or sharing of nude and semi-nude images and/or videos , including images that are digitally altered or wholly generated using artificial intelligence.
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate. In particular, section 8.8 and 8.9 set out more detail about our school's approach to this type of abuse.

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

**County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home.
- have been the victim or perpetrator of serious violence (e.g. knife crime).
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity.
- owe a 'debt bond' to their exploiters.
- have their bank accounts used to facilitate drug dealing.

If a member of staff suspects a child or young person is involved in, or vulnerable to / at risk of involvement in County Lines, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

**Domestic abuse**

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

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

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

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. The DSL will provide support according to the child's needs and update records about their circumstances.

**Homelessness**

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

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

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

**Temporary accommodation notification duty**

Where the school becomes aware that a child has been placed in temporary accommodation outside the local authority area, it will share relevant safeguarding information promptly and work with the responsible local authorities and other agencies in accordance with the applicable notification duties and local arrangements. The DSL will consider the impact of temporary accommodation on attendance, access to services, welfare and safeguarding risk.

**Honour or faith-based abuse (including FGM and forced marriage)**

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

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

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

**FGM**

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

Section 8.1 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

**Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and make an immediate referral to local authority children's social care and, where appropriate, the police. They will not approach family or community members where this may increase the risk.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

**Preventing radicalisation**

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**
    - Negate or destroy the fundamental rights and freedoms of others; or
    - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
    - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **Terrorism** is an action that:
    - Endangers or causes serious violence to a person/people;
    - Causes serious damage to property; or

- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in section 8.1 of this policy, including discussing their concerns with the DSL.

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

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

**Harmful sexual behaviour, sexual harassment and sexual violence between children**

Harmful sexual behaviour (HSB) is an umbrella term for sexual behaviours displayed by children and young people that are developmentally inappropriate and may be harmful or abusive. HSB can occur online, face to face or both.

Children's sexual behaviour exists on a continuum from normal and developmentally expected behaviour, through inappropriate and problematic behaviour, to abusive and violent behaviour. The position of behaviour on the continuum must be assessed in the context of the child's age and developmental stage, the nature and frequency of the behaviour, any difference in age, power or developmental ability, coercion, intimidation and consent.

Sexual harassment and sexual violence may form part of this continuum and may overlap. They can occur between children of any age or sex; through a group of children targeting an individual or group; and online, face to face or concurrently online and offline.

Behaviour between children of significantly different ages or developmental stages is particularly concerning. HSB may indicate that the child displaying it has experienced abuse, trauma, unmet needs or exposure to abusive practices or material. The response will therefore safeguard the victim and wider pupil body while also assessing and supporting the child displaying the behaviour.

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

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

When supporting victims, staff will:

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

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and children who are questioning their gender are at greater risk

Staff should be aware of the importance of:

- Challenging inappropriate behaviours.
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a child or young person makes a report to them, they will follow the procedures set out in Section 8 of this policy, as appropriate.

**Safeguarding and supporting children who display HSB**

The school will balance the need to safeguard the victim and the wider pupil/student body with the need to provide the child displaying HSB with education, safeguarding support and proportionate disciplinary consequences. These actions are not mutually exclusive.

The response will consider age and developmental stage, the nature and frequency of the behaviour, proportionality, risk to others and any unmet needs. HSB in younger children may be a sign of their own abuse, trauma or exposure to abusive practices or materials. Advice will be sought as appropriate from children's social care, the police and specialist HSB or sexual violence services.

Support will address underlying trauma or unmet needs, aim to prevent repetition or escalation, and be reflected in an individual safety and support plan. Any exclusion decision will be lawful, reasonable and fair.

**Serious violence**

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

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

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

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment

- Having been involved in offending, such as theft or robbery

Serious violence is a safeguarding concern. It may involve physical assault, carrying, threatening with or using a weapon, and can be linked to peer conflict, bullying or criminal exploitation. Children involved in serious violence may also be victims of abuse or exploitation.

Staff must report immediately to the DSL or a Deputy DSL any concern that a child is carrying, has carried, has used, or intends to use a weapon. The DSL will assess the risk, consider all relevant safeguarding information and take appropriate action, which may include a safety and support plan, referral to external agencies, contact with the police and measures to de-escalate conflict.

Staff will be particularly alert to children whose education has been disrupted through suspension, exclusion or alternative provision, and those with a history of offending. The Multi-Academy will provide or facilitate timely, evidence-based support where appropriate.

**Checking the identity and suitability of visitors**

The school has clear arrangements for all individuals coming onto the premises, including professional visitors, contractors, guest speakers, performers, relatives and people attending events. The Executive Principal/Principal will use professional judgement to decide whether visitors should be escorted or supervised.

Visitors will be asked to provide appropriate identification, sign in and wear a visitor badge. The school will consider the educational value and age-appropriateness of external organisations or speakers and whether any safeguarding checks are required.

For professional visitors, the school will check identity and be assured that the appropriate DBS check has been completed for the activity. Where the visitor's employer or a third-party organisation confirms that its staff have the appropriate checks, the school will not ask to see the DBS certificate. Where a professional visitor will have no contact with children, a DBS check is unlikely to be required.

The school will not request DBS or barred-list checks, or ask to see existing DBS certificates, for children's relatives or other visitors attending events such as sports days. Appropriate supervision or escorting arrangements will be used where necessary.

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

**Child Abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. This can include a parent, other family members, someone not related to the child / young person, or by a stranger.

Further information is available at: www.actionagainstabduction.org

When we consider who is abducted and who abducts:

- Nearly three-quarters of children abducted abroad by a parent are aged between 0 and 6years-old
- Roughly equal numbers are boys and girls
- Two-thirds of children are from minority ethnic groups.
- 70% of abductors are mothers. The vast majority have primary care or joint primary care for the child abducted.
- Many abductions occur during school holidays when a child is not returned following a visit to the parent's home country (so-called 'wrongful retentions').

Other community safety incident could include people loitering, unknown adults engaging children in conversation, adults taking photos of children or young people, or a violent incident occurring in the neighbourhood.

1. Any concerns that a child may have been abducted, or around a community safety incident need to be reported to the DSL immediately.
2. The DSL will respond to the concern in accordance with the above policy and the Local Safeguarding procedures, depending on the nature of each concern. If we become aware of an abduction, we will follow the local procedure and contact the police and children's social care. If we are made aware of a potential risk of abduction, we will seek advice and support from police and children's social care to confirm that they are aware and seek clarity on what actions we are able to take.
3. From a preventative perspective it is important our pupils are given practical advice on how to keep themselves safe. We provide content within the curriculum which focus on building both confidence and safeguarding knowledge as well as opportunities for children and young people to report their concerns.

**Modern Slavery**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Any child transported for exploitative reasons is considered to be a trafficking victim.

When considering modern slavery, there is a perception that this is taking place overseas. The government estimates that tens of thousands of slaves are in the UK today. Young people being forced to work in restaurants, nail bars, car washes and harvesting fruit, vegetables or other foods may have all been slaves 'hiding in plain sight' within the U.K and rescued from slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been rescued within the UK.

There are a number of indicators which suggest that a student may have been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as follows:

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Has a history of going missing and unexplained moves
- Is required to earn a minimum amount of money every day
- Works in various locations
- Has limited freedom of movement
- Appears to be missing for periods

- Is known to beg for money
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good
- Is one among a number of unrelated children found at one address
- Has not been registered with or attended a GP practice
- Is excessively afraid of being deported.

For those students who are internally trafficked within the UK indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault)
- Prevalence of a sexually transmitted infection or unwanted pregnancy
- Reports from reliable sources suggesting the likelihood of involvement in
- sexual exploitation/the child has been seen in places known to be used for sexual exploitation
- Evidence of drug, alcohol or substance misuse
- Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
- Relationship with a significantly older partner
- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding
- Persistently missing, staying out overnight or returning late with no plausible explanation
- Returning after having been missing, looking well cared for despite having not been at home
- Having keys to premises other than those known about
- Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity
- Truancy / disengagement with education
- Entering or leaving vehicles driven by unknown adults
    - Physical symptoms (bruising indicating either physical or sexual assault)
    - Prevalence of a sexually transmitted infection or unwanted pregnancy
    - Reports from reliable sources suggesting the likelihood of involvement in
    - sexual exploitation/the child has been seen in places known to be used for sexual exploitation
    - Evidence of drug, alcohol or substance misuse
    - Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
    - Relationship with a significantly older partner
    - Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding
    - Persistently missing, staying out overnight or returning late with no plausible explanation
    - Returning after having been missing, looking well cared for despite having not been at home
    - Having keys to premises other than those known about
    - Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity
    - Truancy / disengagement with education
    - Entering or leaving vehicles driven by unknown adults
    - Going missing and being found in areas where the child or young person has no known links; and/or has no known links; and/or

- Possible inappropriate use of the internet and forming on-line relationships, particularly with adults.

These behaviours themselves do not indicate that a child is being trafficked but should be considered as indicators that this may be the case.

- If staff believe that a child is being trafficked or is a slave, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.
- The Modern Slavery Act 2015 places a new statutory duty on public authorities, including schools and colleges, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking'.
- Staff need to be aware of this duty and inform the DSL/DDSL should they suspect or receive information that either parents/carers or their children may be victims of modern slavery.
- The DSL will then follow the above safeguarding policy as well as contacting the NCA.

**Children and Young People involved in the Court System and Children with family members in Prison**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The DfE has signposted age-appropriate guides for children and young people within KCSIE which explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

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

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

All information relating to pupils being involved in the Court system or with family members in prison, should be reported to the DSL/DDSL. We will not only signpost the above guidance, where appropriate, to both the young people and parents and carers, but will also provide additional pastoral and wellbeing support to those young people and work with additional agencies where necessary.

**Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet and includes cyber-enabled crimes such as fraud, buying illegal drugs online and CSE and cyber-dependent crimes such as unauthorised access to computers (illegal 'hacking'), 'Denial of Service' attacks of 'booting' and making, supplying or obtaining malware such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cybercrime. If a concern relating to cybercrime is reported, the DSL should consider a referral

to the Cyber Choices programme. This is a nationwide programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing.

## Appendix 3 - Important contacts (school and non-school)

### School and Academy Contacts

Please contact individual school contacts via the school's websites.

| | Role | Name |
|---|---|---|
| **Academy Contacts** | **Academy Safeguarding Director**<br>**Chief Executive Officer**<br>**Safeguarding Lead** | Patricia Platt<br>Teresa Cotter<br>Fahema Hussain |

| School | Role | Name |
|---|---|---|
| **Bishop Walsh** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br><br><br><br>Link Safeguarding Governor<br><br>Designated Teacher (DT)<br>Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Andrew Hamill<br>Sam Mannion, Emily Tallett, Tom Killworth, Shareen Chilwan, Amber Fraser, Kerry Rogers, Natalie Byfield, Leanne Robinson<br>Martin Jackson<br><br>Andrew Hamill<br>Amber Fraser<br>Andrew Hamill<br>Andrew Hamill |
| **Holy Cross** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br><br>Link Safeguarding Governor | Charlotte Gorman<br>Michelle Walsh, Andrew Hunt, Mary Hope, Helen Naraine<br>Kerry Spillane |

| | | |
|---|---|---|
| | Designated Teacher (DT)<br>Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Andrew Hunt<br>Taylor Warren<br>Charlotte Gorman<br>Michelle Walsh |
| **Maryvale** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br><br><br>Link Safeguarding Governor<br><br>Designated Teacher (DT)<br>Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Claire Bonehill<br>Catherine Dalzell, Jenny Cross, Louise Southwell, Kelly Hancox, Victoria Jacombs-Clarke<br>Caroline Hanlon<br><br>Victoria Jacombs-Clarke<br>Victoria Jacombs-Clarke<br>Kelly Hancox<br>Catherine Dalzell |
| **Sacred Heart** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br>Link Safeguarding Governor<br><br>Designated Teacher (DT)<br>Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Dawn Cooper<br>Sam Marshall and Leanne Flint<br>Martin Jackson<br><br>Dawn Cooper<br>Leanne Flint<br>Sonia Bowden<br>Dawn Cooper |
| **St Edmund Campion** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br><br><br><br>Link Safeguarding Governor<br><br>Designated Teacher (DT)<br>Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Jas Mattu<br>Olivia O'Keefe, James Harrison, Kyra Ironside, Alan Grant, Jo Quoroll, John Roche<br><br>Jenny Marks<br><br>Jas Mattu<br>Emma Taintey<br>Jas Mattu<br>Jas Mattu |
| **St Joseph's** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br><br>Link Safeguarding Governor<br><br>Designated Teacher (DT)<br>Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Lauren Chambers<br>Michelle Walsh, John Lynch, Brendan Harvey and Kate McGrath<br>Catherine Biddle<br><br>John Lynch<br>Brendan Harvey<br>Lauren Chambers<br>Lauren Chambers |
| **SS Mary and John** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br><br><br>Link Safeguarding Governor | Louise Stephens<br>Mary Lynch, Helen Vernalls, Shannon Vale, Emily DuNoyer, Corinne Scally, Molly McGrath and Demi Grainger<br>Helen Crowe |

| | | |
|---|---|---|
| | Designated Teacher (DT)<br>Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Shannon Vale<br>Helen Vernalls<br>Emily Du Noyer<br>Louise Stephens |
| **St Nicholas** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br><br>Link Safeguarding Governor<br><br>Designated Teacher (DT)<br>Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Claire Noble-Barton<br>Neil Porter, Katy Smith & Rebecca Burling-Finn<br>Louise Davies<br><br>Claire Noble-Barton<br>Rebecca Burling-Finn<br>Claire Noble-Barton<br>Claire Noble-Barton |
| **SS Peter and Paul** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br><br>Link Safeguarding Governor<br><br>Designated Teacher (DT)<br>Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Emma Calvert-Lyons<br>Neil Porter, Donna Pawley, Elizabeth Flowers<br>Natasha Gill<br><br>Emma Calvert-Lyons<br>Emma Calvert-Lyons/Elizabeth Flowers<br>Emma Calvert-Lyons<br>Emma Calvert-Lyons |
| **The Abbey** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br>Link Safeguarding Governor<br><br>Designated Teacher (DT)<br>Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Amy Davis<br>Alan Grant, Abby Weir<br>Shibu Kurian<br><br>Michelle Morgan<br>Abigail Weir<br>Suzy Haynes<br>Amy Davis |
| **Blessed Dominic Barberi** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br><br>Link Safeguarding Governor<br><br>Designated Teacher (DT)<br>Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Shannon Ryan<br>Mary Lynch, Katherine Flaherty, Kathy Hadley, Jo Pickup and Kelvin Barret<br>Helen Vernalls<br><br>Kathy Hadley<br>Kathy Hadley<br>Katherine Flaherty<br>Shannon Ryan |
| **St Gabriel's** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br><br>Link Safeguarding Governor<br><br>Designated Teacher (DT) | Will Bright<br>Anna Moloney, Jo Coakley, Amy Cunningham, Nicola Hughes<br>Anne Goodeve<br><br>Nicola Hughes |

| | | |
|---|---|---|
| | Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Amy Cunningham<br>Will Bright<br>Anna Maloney |
| **SS Peter and Paul Lichfield** | Designated Safeguarding Lead (DSL)<br>Deputy Designated Safeguarding Leads (DDSL)<br>Link Safeguarding Governor<br><br>Designated Teacher (DT)<br>Special Educational Needs Coordinator (SENCO)<br>Mental Health Lead<br>DSL Prevent Lead | Claire Faulkner<br>Jenny Ansell Carla Tysall<br>Anne Thompson<br><br>Claire Faulkner/ Laura Adams<br>Laura Adams<br>Claire Faulkner/ Lisa Richardson<br>Claire Faulkner |

## Non School Contacts

| Organisation / Role | Name | Contact details |
|---|---|---|
| Birmingham Local Authority Designated Officer (LADO) | Duty LADO | Tel: 0121 675 1669<br><br>Email:ladoteam@birminghamchildrenstrust.co.uk |
| Staffordshire Local Authority Designated Officer (LADO) | Duty LADO | Staffordshire LADO referral form: https://apps2.staffordshire.gov.uk/web/formdisplay/?FormID=1308&Ref=XZQYRY |
| Birmingham Children's Trust | Children's Advice and Support Service (CASS) | Monday to Thursday: 8:45am to 5:15pm<br>Friday: 8:45am to 4:15pm:<br>● 0121 303 1888<br>CASS emergency out-of-hours:<br>● Telephone: 0121 675 4806 |
| Staffordshire Safeguarding Children's Partnership | Staffordshire Families Integrated Front Door(SFIFD) | 9am – 5pm Monday to Thursday<br>9am- 4.30pm Friday:<br>● 0300 111 8007<br>Emergency Duty Team (out of hours):<br>● Tel No. 0345 604 2886 |
| Birmingham Family Help | | Family Help Support Team:<br>● Telephone: 0121 303 8117 or contact your Family Help District teams |
| Staffordshire Family Help (Staffordshire Children's Advice Service) | | Email: contactus@staffordshire.gov.uk<br>General enquiries number (Contact Centre):<br>● 0300 111 8000<br>Textphone/Minicom users only:<br>● 01785 276207 |
| NSPCC Helpline | N/A | Call: 0808 800 5000 Email help@NSPCC.org.uk. |

| | | |
|---|---|---|
| Police | N/A | Emergency 999.<br>Non-emergency 101 |

## Appendix 4 - Links to useful information

**Local (Birmingham)**

Birmingham Safeguarding Children Partnership

Birmingham Children's Trust

Birmingham City Council - Children, Young People & Families

BCC Corporate Safeguarding Policy

BCC No Platform Policy | Birmingham City Council

BCC School Safety Plan re children who pose a risk to others

**Local (Staffordshire):**

Staffordshire Safeguarding Children's Partnership

Staffordshire Children, Young People and Families

**Use of Artificial Intelligence in education**

Generative artificial intelligence (AI) in education (DfE)

Using AI in education: support for school and college leaders (DfE)

**Online safety:**

NSPCC online-safety-for-schools

National Child Exploitation & Online Safety Centre

Bristol online-safety-and-cyber-crime resources

Hampshire online safety resources

**Safer Recruitment:**

Staffing and employment: advice for schools (DfE)

Safer Recruitment Consortium guidance