



Safeguarding and Child Protection Policy

Our Vision

Achieving More Together

Our Mission

Working together passionately to achieve the best outcomes for our SEND and AP children and young people

Schools:	Culverhill School Website: Culverhill School - Home New Siblands School Website: New Siblands School - Home Pathways Learning Centre Website: Pathways Learning Centre South Glos PRU Downend, Bristol Two Bridges Academy Website: Two Bridges Academy - Home
Other:	Central Trust staff Website: Enable Trust - Home
Ratified by:	Board of Trustees
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This ratified policy can be found on the [Enable Trust - Home](#) website and each school website

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Notes:

- We use the term ‘must’ and ‘should’ throughout this policy. We use the term ‘must’ when a person in question is legally required to do something, and ‘should’ when the advice set out should be followed unless there is good reason not to.
- Hard copies of this policy - and any policy or document referred to in this policy - can be obtained by contacting each school office.

SECTION A – Contacts, Introduction and statutory information
1.0- Key Contacts (See also [Appendix 4](#) for other LA contact details)

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Safeguarding Trustee	Nicola Jones	nicola.jones2@enabletrust.org.uk
CEO	Andrew Buckton	andrew.buckton@enabletrust.org.uk
Trust Strategic Lead	Louise Leader	Louise.leader@Pathwayslearningcentre.org
Culverhill School Designated Safeguarding Lead (DSL) Deputy DSLs Online Safety Lead	Sally Clark Chris Walker Headteacher Sarah Holt Deputy Headteacher Naomi Cowley Assistant Headteacher Claire Mays Assistant Headteacher Kerry Hiscock	t: 01454 553001 ext 210 e: sally.clark@culverhillschool.org.uk t: 01454 553001 e: chris.walker@culverhillschool.org.uk t: 01454 553001 e: sarah.holt@culverhillschool.org.uk t: 01454 553001 e: naomi.cowley@culverhillschool.org.uk t: 01454 553001 e: claire.mays@culverhillschool.org.uk t: 01454 553001 e: kerry.hiscock@culverhillschool.org.uk
New Siblands School Designated Safeguarding Lead (DSL) Deputy DSLs Online Safety Lead	Hazel Sinclair Assistant Headteacher Karl Hemmings Headteacher Margarita Steer Deputy Headteacher Krissy Emery Assistant Head Teacher Angela Windsor Teacher Karl Hemmings Headteacher	t: 01454 553002 ext 304 e: hazel.sinclair@newsiblands.org.uk t: 01454 553002 e: karl.hemmings@newsiblands.org.uk t: 01454 553002 e: margarita.steer@newsiblands.org.uk t: 01454 553002 e: kristina.emery@newsiblands.org.uk t: 01454 553002 e: angela.windsor@newsiblands.org.uk t: 01454 553002 e: karl.hemmings@newsiblands.org.uk

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Pathways Learning Centre Designated Safeguarding Lead (DSL) Deputy Designated Safeguarding Leads (DDSLs)	Laura Spires Head of Student Support and Intervention / DSL	T: 01454 862640 Laura.spires@pathwayslearningcentre.org All available via : 01454 862640 (school office)
	Cassie Perryman Fosse Primary Unit Co	Cassie.perryman@pathwayslearningcentre.org
	Dan Walton Deputy Head / Co-Head	Daniel.walton@pathwayslearningcentre.org
	Gareth Jones Assistant Head	Gareth.jones6@pathwayslearningcentre.org
	Heather Beach Cotswold Unit Co	Heather.Beach@pathwayslearningcentre.org
	Jo Beresford Senior SSW	Joanne.Beresford1@pathwayslearningcentre.org
	Josh Lloyd Senior SSW	Josh.Lloyd@pathwayslearningcentre.org
	Louise Leader Executive Head / Co-Head	Louise.leader@pathwayslearningcentre.org
	Luke England Senior SSW	Luke.England@pathwayslearningcentre.org
	Rhian Kempson Senior SSW	Rhian.Kempson@pathwayslearningcentre.org
	Rowan Baker Senior SSW	Rowan.Baker@pathwayslearningcentre.org
	Sarah McCombe Home Tuition Unit Co	Sarah.McCombe@pathwayslearningcentre.org
	Sarah Risdale Senior SSW	Sarah.Risdale@pathwayslearningcentre.org
DDSL and Online Safety Lead	Simon Clarke Senior SSW	Simon.Clarke@pathwayslearningcentre.org
	Steve Callow Frome Unit Co	Stephen.Callow1@pathwayslearningcentre.org
	Connie Coppin Assistant Head	Connie.Coppin@pathwayslearningcentre.org

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Two Bridges Academy Designated Safeguarding Lead Deputy DSL	Alice Maggs Deputy Head Teacher Carrie Osmond Headteacher	t: 01454 553003 e: alice.maggs@twobridgesacademy.org.uk t: 01454 553003 e: Carrie.osmond@twobridgesacademy.org.uk
South Gloucestershire Local authority designated officer (LADO)	Jon Goddard	t: 01454 868508 (Mon – Fri, 10am – 3pm) e: lado@southglos.gov.uk
Chairs of Local Governing Bodies: Culverhill School New Siblands School Pathways Learning Centre Two Bridges Academy	Neta Roylance- Smith Moira Lloyd TBA Gillian Foxton	neta.roylancesmith@culverhillschool.org.uk moira.lloyd@newsiblands.org.uk gillian.foxton@twobridgesacademy.org.uk
Local Governing Body Safeguarding Governors: Culverhill School New Siblands School Pathways Learning Centre Two Bridges Academy	Neta Roylance- Smith Andrew Scully Bryony McCabe Cath Morgan	neta.roylancesmith@culverhillschool.org.uk andrew.Scully@newsiblands.org.uk bryonymccabe@outlook.com cath.morgan@twobridgesacademy.org.uk
<u>South Glos Access and Response Team (ART)</u>		t: 01454 866000 (Mon – Thu 9am–5pm) (Fri 9am-4.30pm) t: 01454 615165 (out of hours/weekends) e: accessandresponse@southglos.gov.uk
<u>Prevent in South Glos</u>		t: 01454 863844 e: preventproject@southglos.gov.uk
LADO	Jon Goddard	T: 01454 868508 E: lado@southglos.gov.uk

2.0 - Purpose of the Policy

Each school aims 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
- We maintain an attitude of "It could happen here"
- (Where they are able to), children have skilled adults they can talk to if they have concerns, and are assured that their voices are heard
- children are supported to recognise when they are at risk, help them understand how to keep themselves safe and know how to get help when they need it
- Where children are unable to talk, ask for help, or communicate freely, all staff maintain an acute awareness of their role in being particularly vigilant to the needs of our most vulnerable children with SEND
- All staff understand their role in preventative work, particularly in relation to trauma and adverse childhood experiences (ACEs) and takes a trauma informed approach to all interactions with children

3.0 - Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023) and the Academy Trust Governance Guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners: [South Gloucestershire Children's Partnership](#). Other local authority partnerships can be found [here](#).

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 each school.
- Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015, which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at each school.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.

- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding 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, sex 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 making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there’s evidence that they’re being disproportionately subjected to sexual violence or harassment.
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and Childcare Act 2006, which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

This policy also complies with our Funding Agreement(s) and Articles of Association.

4.0. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment.
- 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 prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. [Appendix 1 Types of Abuse](#), 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 Types of Abuse](#) defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This can include computer-generated imagery.

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.

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

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

5.0 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 (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, sex 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 absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

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

This will be underpinned by schools:

- Behaviour / Relationship Policy
- Pastoral support system
- Planned programmes of relationships, sex and health education are taught in PSHE, RSE, ICT which is inclusive and delivered regularly. Teaching is adapted according to age and ability and could cover 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 female genital mutilation (FGM) and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

6.0 - Related Policies

Enable Trust:	
Allegations of abuse against staff	Protocols for the use of CPOMS
Staff Code of conduct	Record Retention
Complaints	Safer Recruitment and Selection
Equality	Whistle Blowing
Online Safety	Health and Safety
SEND	<i>Use of AI</i>
<i>RSHE (Revised 2025/26)</i>	<i>Responding to serious incidents protocol</i>

Each School:	
Acceptable use of Technology	Educational visits
Attendance	Supporting Pupils with Medical Needs
Behaviour / Relationships	Anti- Bullying
<i>Physical Intervention</i>	Exams
Designated teacher for looked-after and previously looked-after children	

South Gloucestershire Safeguarding Children and Adults Boards:
<u>Safeguarding Children, Young People and Young Adults with Disabilities Guidance</u>

7.0 Confidentiality

Each school's approach to confidentiality and data protection with respect to safeguarding can be found in the [Enable Trust Data Protection Policy](#)

7.1 - This will include:

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

7.2 - The DSL should consider that:

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

7.3 - Regarding anonymity, all staff will:

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

- 7.4 - The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).
 - Confidentiality is also addressed in this policy with respect to record-keeping in Section 20, and the Enable Trust Allegations of Abuse against Staff Policy and Procedures.
 - We will follow procedures set out by the South Gloucestershire Children's Partnership.

SECTION B – Roles and Responsibilities

8.0. Roles and responsibilities

8.1 Safeguarding and child protection is everyone's responsibility.

This Trust wide policy applies to all staff, including the Trust Board, Local Governing Bodies, central Trust staff, contract staff, volunteers, agency staff, and anyone working for and on behalf of Enable Trust, and is consistent with the procedures of the 3 safeguarding partners. This policy must be read in conjunction with individual schools' policies. Our policy and procedures also apply to extended school and off-site activities.

8.2 – All staff MUST:

8.2.1 - Read and understand Part 1 of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually. Staff who work directly with children will read and understand Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

Copies will be available on each school's online portal, for all staff to read and understand. All staff will sign a declaration at the beginning of each academic year, to say that they have read and understand the guidance. New staff during the academic year will also be required to follow this procedure as part of their induction.

8.2.2 - All staff must be aware of:

- Our systems which support safeguarding, including this Safeguarding and Child Protection policy, the Child Protection and Management System (CPOMS), the staff code of conduct policy, the role and identity of the designated safeguarding lead (DSL) and deputies, each school's Behaviour/Relationship policy, the online safety policy and the safeguarding response to children who are absent from education for prolonged periods and/or repeat occasions.
- The early help assessment process (EHAP) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).

- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The need to reinforce the importance of online safety when communicating with parents and carers. This includes making parents and 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).
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans/gender questioning (LGBTQ+) can be targeted by other children, so provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.
- What to look for to identify children who need help or protection.
- Training - Section 21 of this policy, and the Enable Trust Allegations of Abuse against Staff Policy and Procedures, outline in more detail how staff are supported to do this.

8.2.3 – All Staff must safeguard children's wellbeing and their own, in accordance with statutory provisions, the local Safeguarding Children Board procedures and the Department for Education's 'Keeping Children Safe in Education' statutory guidance.

8.2.4 - All staff must be familiar with the school's policies and procedures relating to safeguarding and, given their position of trust, must ensure that they do not put themselves in a situation where their conduct or behaviour with any pupil could be misconstrued.

- With regard to engaging with a child on a one-to-one basis, staff should always take all measures to make sure pupils are not put in a position of potential harm. This means, in line with KCSIE with regard to any work in a secluded area or behind a closed door, staff should be aware of the potential risks when working one to one with a pupil.
- Where possible engaging with a pupil on a one-to-one basis should take place with another member of staff present or close by and where this is not possible, in a room with visual access or alternatively the door should be left open.
- There is a distinction between unnecessarily working with a pupil alone that is outside normal expected practice, and specific contexts where it is necessary and expected.
- If a staff member is concerned at any point that an interaction between themselves and a pupil may be misinterpreted, they should report this to their line manager or the Headteacher.

8.3 - [The designated safeguarding lead \(DSL\)](#)

8.3.1 - Each school's DSL is a member of the school senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school, and the role is delegated by the Headteacher. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online. The DSL and Deputy DSL's will read the Keeping Children Safe in Education guidance in its entirety and keep updated with any other local and national guidance.

8.3.2 - When the DSL is absent or dealing with another safeguarding concern, the deputies will act as cover. The DSL takes lead responsibility for child protection and wider safeguarding in the school (including online safety and understanding the filtering and monitoring systems and processes in place).

8.3.3 – **Availability** - During term time, the DSL and/or DDSL's will be available during school hours for staff to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, in exceptional circumstances availability via phone and or other such media is acceptable. Local arrangements will be made for out of hours contact, where appropriate. For example, where a school trip or visit is taking place outside of typical school hours, the DSL or DDSL should be contactable to support staff where required.

8.3.4 - All staff will be made aware of who the Designated Safeguarding Lead is and what their role is.

8.3.5 - Annex C, (Page 171 - [Keeping Children Safe in Education 2025](#)), sets out clearly the role of the DSL in schools.

8.3.6 - The Role of the Designated Safeguarding Lead

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out below, remains with the designated safeguarding lead. This responsibility should not be delegated.

8.3.7 Managing Referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and in liaison with the Head of Personnel
- refer cases where a crime may have been committed to the Police as required. *NPCC- When to call the police* should help understand when to consider calling the police and what to expect when working with the police. [When to call the police - NSPCC](#)

8.3.8 Work with Others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners (Local authority, the clinical commissioning group (CCG) and the chief officer of police for an area any part of which falls within the council area).
- liaise with the headteacher to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirements for children to have an appropriate adult. Further information can be found in the Statutory guidance [- PACE Code C 2019.](#)
- as required, liaise with the 'case manager' and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, service providers and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college.

8.3.9 Training

The Designated Safeguarding Lead and any deputies will be trained to an advanced level by attending Advanced Inter-agency Child Protection training and this will be maintained by attending CP Update training every 2 years thereafter. The DSL will undertake Prevent awareness training. This training will provide them with a good understanding of their own role and the process, procedures and responsibilities of other agencies, particularly children's social care, so they can:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's safeguarding and child protection policy and reporting procedures, especially new and part time staff

- ensure all new staff attend safeguarding induction training and that relevant staff have read and understood Part 1 and Annex B (if working directly with children) and Annex A (if not working directly with children) of KCSIE 2025
- ensure that all staff have read and understood Part 1 and Annex B (if working directly with children) or Annex A (if not working directly with children) of KCSIE 2025 and provide a yearly update training session during INSET to all staff as well as on-going CPD during the year for staff to support the culture of safeguarding
- are alert to the specific needs of children in need, those with special educational needs and young carers
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- understand the importance of information sharing, within the school, and with the three safeguarding partners, other agencies, organisations and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals using My Concern.
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or at home
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking into account their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via bulletins, meeting other designated safeguarding leads at DSL Forums and participating in training and school reviews, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role
- ensure all staff have regular update updated online safety training, including an understanding of all the expectations, roles and responsibilities around filtering and monitoring.
- Keep a training plan for the school which shows all training throughout the year

8.3.10 - Raise Awareness

The designated safeguarding lead will:

- ensure the school's safeguarding and child protection policy is known, understood and used appropriately

- ensure the school's safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect will be made and the role of the school in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with all school staff so that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort
- support teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

8.3.11 - Child Protection File

- Where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) or the named persons with oversight for special educational needs and disability (SEND) in a college, are aware as required.
- In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives. More information on the child protection file is in Annex C. (As per KCSIE 2025 paragraphs 121 & 122)

8.4- Trust Board

8.4.1 - All Trustees of the Trust Board need to understand their safeguarding duties and will be kept up to date with legislation and regulation by the Board Secretary. The Trust Board has a legal responsibility to make sure that the schools have effective safeguarding policies and procedures in place and monitors the implementation of this policy regularly.

8.4.2 - The Trust Board will:

- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold each school Governing Body and head teacher to account for its implementation.
- Receive a report from each school's Local Governing Body, following safeguarding audits of schools on an annual basis.
- Delegate operational responsibilities to each school's Local Governing Body, as defined below in Section 8.5
- Appoint a member of the Board to monitor the effectiveness of this policy in conjunction with the full Trust Board, who will present regular safeguarding reports to the Board.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the schools local multi-agency safeguarding arrangements.

8.4.3 - The Chair of the Trust Board will act as the 'case manager' in the event that an allegation of abuse is made against the Chief Executive Officer, where appropriate (see the Enable Trust Allegations of Abuse against Staff Policy and Procedures).

8.4.4 - All Trustees will read Keeping Children Safe in Education Parts 1 & 2 and the Chair of Trustees and any Trustee with responsibility for Safeguarding and / or SEND will read KCSIE in its entirety. All will sign a declaration to say that they have read and understand the guidance. New Trustees during the academic year will also be required to follow this procedure as part of their induction.

8.4.5 – Section 21 - Training, of this policy has information on how the Trust Board are supported to fulfil their role.

8.5- Local Governing Bodies (LGB)

8.5.1 - Each LGB 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.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the schools local multi-agency safeguarding arrangements.
- Provide an annual report to the Trust Board, following the annual safeguarding audit.
- Appoint a Governor to monitor the effectiveness of this policy in conjunction with the Local Governing Body. This is always a different person from the DSL.

- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- Ensure the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
 - 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.
- Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
 - The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
 - Each school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
 - Allegations against staff are covered in all basic training and induction training that takes place within schools. We follow the mandatory guidance in [KCSIE 2025](#) Part Four, which includes the management of 'Low Level Concerns'. Please refer to the Enable Trust policy on managing allegations of abuse against staff and procedures.
 - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
 - Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed.
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

8.5.2 - Each school's LGB Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see the Enable Trust Allegations of Abuse against Staff Policy and Procedures).

8.5.3 – All Governors will read Keeping Children Safe in Education Parts 1 & 2 and the Chair of Governors and any Governor with responsibility for Safeguarding and / or SEND will read KCSIE in its entirety. All will

sign a declaration to say that they have read and understand the guidance. New Governors during the academic year will also be required to follow this procedure as part of their induction.

8.5.4 - Section 21 - Training of this policy has information on how the LGB are supported to fulfil their role.

8.6 - The Headteacher

Each school Headteacher is responsible for the implementation of this policy, including:

8.6.1 - 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 the appropriate status, authority, 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 the Enable Trust Allegations of Abuse Against Staff Policy and Procedures).

8.6.2 - For early years:

- Making sure each child in the Early Years Foundation Stage is assigned a key person, normally this will be the teacher.
- Overseeing the safe use of technology, mobile phones and cameras in the setting.

8.7 - Virtual school heads

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

They should also identify and engage with key professionals, e.g. DSLs, Special educational needs co-ordinators, social workers, mental health leads and others.

SECTION C – What to do –Safeguarding information for staff

9.0 - Recognising abuse and taking action

Staff (including supply and agency staff) volunteers, LGB and Trust Board must follow the procedures set out below in the event of a safeguarding issue.

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

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

Make a referral to [children's social care and/or the police immediately](#) if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral but speak to the DSL/DDSL first, unless a child is at immediate risk of harm.**

Tell the DSL (see [section 9.2](#)) as soon as possible if you make a referral directly.

The allegation will be dealt with in accordance with national guidance and agreements, as implemented locally by the [South Gloucestershire Children's Partnership](#).

Follow the following link to the GOV.UK webpage for reporting child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>.

9.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Use TED (Tell, Explain, Describe) questions to help the child share without leading them
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- **Seek out the DSL/DDSL in person** or by phone for concerns that are urgent e.g. bruising/disclosure considered to be of a serious nature, or is an immediate mental health concern, rather than rely on the DSL/DDSL accessing emails or CPOMS notifications before a child goes home.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not apply your own judgement.
- For all cases report on CPOMS. If in the exceptional circumstance that the DSL/DDSL is not available and if appropriate, make a referral to children's social care and/or the police directly (see 9.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

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

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

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

- Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.
- FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.
- Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix 2 – specific safeguarding issues, of this policy.

Any teacher who either:

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures. The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

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

9.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger see 9.1).

Follow the process outlined in the [flow diagram - Figure B \(Appendix 3\)](#), which illustrates the procedure to follow if you have any concerns about a child’s welfare. Where possible, speak to the DSL first to agree a course of action-

Exceptional Circumstances

If in exceptional circumstances the DSL/DDSL's are not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care or appropriate agency for the child's home Local Authority. [Appendix 4 provides a list of useful contacts.](#)

Make a referral to local authority children's social care directly, if appropriate (see 9.6 'Referral' below). Share any action taken with the DSL as soon as possible.

9.5 Early help Assessment

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

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

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

Each school follows the [South Gloucestershire early help process \(or equivalent process for pupils from other Local Authorities\)](#) which includes the use of the Early Help Assessment Plan (EHAP) when necessary. All children's needs are supported and reviewed through the EHCP annual review process. When additional needs arise, the DSL will initiate a family support process in the form of a school early help meeting and possible ongoing plan or direct referral. However, it may be appropriate for an EHAP to be initiated. The DSL takes on the role of Lead Professional or becomes a member of a Team around the Child/Family (TAC/F) as part of the EHAP process. Should this be delegated to a member of staff then they are supported by the DSL, for example, by being given time to write the EHAP and attend TAC/F meetings.

9.6 Referrals for external support

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral. If you make a referral directly (see section [9.1](#)), you must tell the DSL as soon as possible and you will be supported to do so. The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. **The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.**

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

Table 1

Social Care Team	Contact
South Gloucestershire Access and Response Team	01454 866000
North Bristol Social Work Assessment Team	0117 9038700
Bath and North East Somerset Children and Families Assessment and Intervention Team	01225 396111 or 01225 477929
Wiltshire Multi Agency Safeguarding Hub	0300 456 0108
Gloucestershire Children and Families Helpdesk	01452 426565

Prevent duty

9.7 If you have concerns about extremism

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

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

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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which all Enable Trust staff, the Trust Board, and LGB can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations. See **Appendix 5 flow diagram** – [Prevent Pathways Diagram](#)

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

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

9.8 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If you have a mental health concern about a child that may or may not be a safeguarding concern, take immediate action and report on CPOMS and directly to the DSL/DDSL.

10.0 - Concerns about a staff member, supply teacher, agency staff, volunteer or contractor

10.1 - If you have concerns about a member of staff (including a supply teacher, agency staff, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, agency staff, volunteer or contractor) posing a risk of harm to children, **speak to the headteacher as soon as possible**. If the concerns/allegations are about the Headteacher, speak to the Chair of Governors.

The Headteacher/Chair of Governors will then follow the procedures set out in the Enable Trust Allegations of Abuse against Staff Policy and Procedures, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, agency staff, volunteer or contractor) to the Headteacher, report it directly to the [Trust Strategic Safeguarding Lead](#).

If a school receives an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, schools will follow the school safeguarding and child protection policies and procedures, informing the LADO, as would be the case with any safeguarding allegation.

10.2 - Concerns about a member of the Central Trust Staff

If the concern relates to a member of the Enable Trust Central Team, it must be reported immediately to the [Trust Strategic Safeguarding Lead](#), who will then follow the procedures set out in the Enable Trust Allegations of Abuse against Staff Policy and Procedures, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of the Enable Trust Central Team to the Strategic Safeguarding Lead, report it directly to the Chief Executive Officer ([CEO](#)).

If the concern relates to a member of Enable Inclusion Team, it must be reported immediately to the Chief Executive Officer (CEO), who will then follow the procedures set out in the Enable Trust Allegations of Abuse against Staff Policy and Procedures, if appropriate.

If the concern relates to the Strategic Safeguarding Lead, it must be reported immediately to the Chief Executive Officer (CEO), who will then follow the procedures set out in the Enable Trust Allegations of Abuse against Staff Policy and Procedures, if appropriate.

If the concern relates to the CEO, it must be reported immediately to the South Gloucestershire local authority designated officer (LADO).

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

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

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

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

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity 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 chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

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

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

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

Financially motivated incidents

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

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

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

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

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

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

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

11.0 - Allegations of abuse made against other pupils

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

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

Most cases of pupils hurting other pupils will be dealt with under each school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put pupils in the school at risk.
- Is violent.
- Involves pupils being forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).
- [See Appendix 2 – Specific Safeguarding Issues, for more information about child-on-child abuse.](#)

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

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

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

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different sexes – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 12.0 below).
- Ensure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems which could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area and should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”.
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to.
 - A friend may make a report.
 - A member of staff may overhear a conversation.
 - A child’s behaviour might indicate that something is wrong.
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
 - That they should speak to the DSL if they have any concerns.
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL or Senior staff as appropriate, will take the lead role in any sanctions or further support required for the alleged perpetrator(s)..

Appropriate sanctions may be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent a school from coming to its own conclusion about what happened and implementing a response. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this.

- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

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

11.4.1 - Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are artificially generated that otherwise appear to be a photo or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

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

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

11.4.2 - Initial review meeting with the DSL

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

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

11.4.3 - The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

11.4.4 - Further review by the DSL

- If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.
- They will hold interviews with the pupils involved (if appropriate).
- If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, the DSL will follow all procedures that are relevant to the concern.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 20 of this policy also apply to recording these incidents.

11.5 - Curriculum coverage

Pupils are taught about the issues (where appropriate to learning needs) surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and tutorial programmes as appropriate. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

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

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

12.0 - Reporting systems for pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Promote a culture of talking to adults
- Provide planned opportunities within the curriculum to understand and discuss issues related to wellbeing and safety, including tutorials/assemblies, PSHE lessons, and specific events

13.0. Online safety and the use of mobile technology

13.1 - 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, each school aims to:

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

13.2 - The 4 key categories of risk

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

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact** – being subjected to harmful online interaction with other users, such as 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** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

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

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology.
 - Keeping personal information private.
 - How to recognise unacceptable behaviour online.
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.

- Make sure staff are aware of any restrictions placed on them with regards to the use of their 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.
- An exception to this is that a personal phone may be used in the case of an emergency e.g. to ring an ambulance
- 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 DSL/DDSL's or designated staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. (Schools can use the DfE's [Plan technology for your school - GOV.UK](#) to self-assess against filtering and monitoring standards)
- Be aware of the increasing importance of the safe use of Artificial Intelligence (AI). The DfE has published [Generative AI: product safety expectations - GOV.UK](#) to support schools in understanding how filtering and monitoring requirements apply to the use of generative AI in education.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Provide regular safeguarding and children 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 and camera use. For comprehensive details about the use of mobile phones and cameras, please refer to the 'Use of Personal Devices' in the Enable Trust Online Safety Policy, which you can find on each school's website.

14.0 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).

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

We recognise that pupils with SEN 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 and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers, cognitive understanding and difficulties in managing or reporting these challenges.

We know that statistically children and young people with SEN and disabilities are most vulnerable to abuse. Therefore, training for school staff working with children and young people will include recognising signs of abuse in pupil particular cohorts e.g. if a pupil cannot verbally tell someone what has happened to them.

16. 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 absent from education where there are known safeguarding risks
- The provision of pastoral and/or academic support.

17. Children Looked-after and children previously looked-after

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL has details of children's social workers and relevant virtual school heads.
- Each school will appoint a designated teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

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

18. Pupils who are lesbian, gay, bisexual or trans/gender questioning

- **The section of KCSIE 2025 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.**
- We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour / Relationships Policy for more detail on how we prevent bullying based on gender or sexuality.

- We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.
- When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.
- When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs
- We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.
- Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

SECTION D – Management of Safeguarding

19.0. Complaints or concerns about staff

19.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation and will be handled in accordance with Enable Trust Allegations of Abuse Against Staff policy, available on the 'Every' system. Please follow the reporting concerns about a member of staff protocol found in [Appendix 3 Figure D](#)

19.2 Whistle-blowing

Enable Trust's [Whistle Blowing Policy and Procedure](#) covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures.

20. Record-keeping

20.1 - We will hold records in line with the Enable Trust Records Retention Policy, which aligns with the government record keeping guidance and KCSIE 2025.

<https://www.gov.uk/government/publications/record-keeping-and-retention-information-for-academies/record-keeping-and-retention-information-for-academies-and-academy-trusts>

20.2 - Each school uses a secure online system called Child Protection Online Management (CPOMS) for reporting and recording all safeguarding concerns, discussions, decisions made and the reasons for those decisions about a child. This will 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, or instances that are being monitored.

This information is then shared with the people who need to know, allowing the appropriate action to be taken. All staff are trained in the use of CPOMS.

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

20.3 – Recording during an ICT systems failure

In the rare case of a school's digital recording systems being unavailable, staff must use the paper recording system available in each school, on the staff room notice board. See Appendix XXX). The same processes for recording and reporting will apply.

20.4 - 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.

20.5 - Any hand-written records will be retained, even if they are subsequently typed up in a more formal report and these will be uploaded to CPOMS. All non-electronic records relating to child protection

concerns and referrals will be kept in a separate child protection file for each child, in a secure cabinet and will remain confidential.

20.6 - 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. If an agency e.g. the police request information, there are protocols to follow.

20.7 - Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

20.8 - 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 as soon as possible, securely, and separately from the main pupil file.

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

- **5 days** for an in-year transfer.
- **Or the first 5 days** of the start of a new educational placement.

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.

20.9 - In addition:

- The Enable Trust recruitment and selection policy and procedures set out our policy on record-keeping with respect to recruitment and pre-appointment checks.
- The Enable Trust policy sets out the policy with respect to allegations of abuse made against staff.

21. Training

21.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand each schools 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-school 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 being 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, keeping children safe in education, policies, as required but at least annually (for example, through whole school inset days, emails, e-bulletins and staff meetings), to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Volunteers will receive appropriate training, if applicable.

21.2 - The DSL and Deputy DSLs

The DSL and deputies will undertake child protection training, followed by advanced child protection update training within two 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.

21.3 - Trust Board

All the Trustees (The Trust Board) will receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.

- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

Additionally, the Trustee with responsibility for safeguarding will undergo training, refresher courses and updates to equip them with the necessary knowledge and skills to fulfil their role effectively. They will complete the National College 'certificate in the role of safeguarding link governor or trustee for academies' training.

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

21.4 Local Governing Body (LGB)

All the LGB's Governors will receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

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

Additionally, the Governor with responsibility for safeguarding will undergo training, refresher courses and updates to equip them with the necessary knowledge and skills to fulfil their role effectively. They will complete the National College 'certificate in the role of safeguarding link governor or trustee for academies' training.

As each school's LGB Chair of Governor's may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

21.5 - Recruitment – interview panels

At least one 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.

The Enable Trust recruitment and selection policy and procedures document has more information about our safer recruitment procedures.

22.0 Safer recruitment

- Enable Trust has a Recruitment and Selection Policy and Procedures that aims to provide staff responsible for recruiting, guidance on their role and responsibilities on respect of the various stages of the recruitment and selection process and is based on part 3 of Keeping Children Safe in Education 2025.
- This includes the key elements of recruitment and selection such as reviewing the vacancy, job description and person specification, advertising, short-listing, assessment and selection, conducting pre-employment checks, appointment and induction.
- To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

22.1. Checking the identity and suitability of visitors

- All visitors will be required to verify their identity to the satisfaction of staff on arrival.
- If the visitor is unknown to the setting, school will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign in via the electronic Sign-In App or alternative, in the reception area and wear a visitor's badge.
- Visitors to schools who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:
 - Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
 - The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out.
- Entry into school premises is by electronically controlled doors, which either require a pass, or authorised opening.
- Parents and carers are allowed on school site during certain times of the day (during pick-up and drop-off) and that this is with the permission of the schools. Should there be any concerns raised about the conduct of parents/carers or visitors they will be asked to leave and further action taken to ensure the safety of children and young people.
- All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into any school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

- **Visiting speakers – The content of any visiting speaker’s presentation, must be reviewed and/or discussed with the trust link member of staff, to ensure the content is appropriate to the needs and circumstances of our children.**

23. Non-collection of children

The DSL should be informed if a child is not collected at the end of the session/day. Each school will follow its procedures including having information on contacting parents/carers, agreement regarding staff supervision beyond the school day, and how the incident will be recorded. Pupils who refuse to go home at the end of the day, despite support and intervention from the DSL/DDSL, must be reported to social care via [the appropriate team](#) eg ART. Or direct contact if the pupil is already known to social care and has a social worker, or via the out of [hours duty team](#).

24.1 Pupils absent from education

Each school will have procedures designed to ensure that pupils absent from education are found and returned to effective supervision as soon as possible. The procedure should include information on contacting parents/carers, who will look after the child and how the incident will be recorded. The details of the approach taken in each school can be found in the school’s Attendance Policy and procedures, and which follow updated statutory guidance ‘[working together to safeguard attendance](#)’.

24.2. Children Missing Education – (CME)

Schools following their protocols regarding pupils absent from education (section 24 above) may also need to report a child as ‘missing education’, if their whereabouts are unknown, or when there is suspicion that a child has moved out of the area. Schools must not remove a child from their school roll until 4 weeks after they have reported the child as missing. During this time schools must work with agencies to try to identify the location of the child and explore the identification of receiving school details BEFORE a central transfer file (CTF) can be actioned. Missing children must be reported to the Local Authorities Children Missing Education (CME) Team.

25. Monitoring and review arrangements

- Each school’s LGB will oversee the implementation of this policy, monitoring and evaluating its impact.
- This policy will be reviewed and ratified annually by Enable Trust Board.
- A Local Authority annual audit of children protection and safeguarding will be completed by each school, and outcomes reported to the LGB, and a LBG report to Enable Trust Board.

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

Appendix 1: Types of Abuse

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

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 or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- Sexual abuse can take place online, and technology can be used to facilitate offline abuse.
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- The sexual abuse of children by other children is a specific safeguarding issue and all staff should be aware of it and the procedures for dealing with it. ([see Part 5 Keeping children safe in education 2025 Page 112 onwards](#)). See also section 11 of this policy.

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: Other specific Safeguarding Issues and definitions

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1. 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. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Child criminal exploitation (CCE) and Child sexual exploitation (CSE)

2. **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 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.

- We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.
- In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.
- Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.
- Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.
- Some of the following can be indicators of both child criminal and sexual exploitation where children:
 - appear with unexplained gifts, money or new possessions without plausible explanation
 - associate with other children involved in exploitation
 - Excessive receipt of texts/phone calls including from unknown adults or peers
 - suffer from changes in emotional well-being

- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

3. Child sexual exploitation (CSE)

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 or occur through the use of technology. 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 indicators above, indicators of CSE can include a child:

- Inappropriate sexualised behaviour for age/sexually transmitted infections or becoming pregnant
- Evidence of/suspicions of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Frequenting areas known for sex work
- Concerning use of internet or other social media

- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being

Potential vulnerabilities which increase risk include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example)
- Recent bereavement or loss
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories)
- Sexual identity

More information can be found in:

[Child sexual exploitation: Definition and a guide for practitioners](#) (DfE 2017)

Practitioners should also be aware that many children and young people who are victims of sexual exploitation may not recognise themselves as such, but they should still be regarded as victims.

4. 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 CCE and CSE 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 (from school or home) and are subsequently found in areas away from their home
- have been the victim, perpetrator or alleged 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

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office and [The Children's Society County Lines Toolkit For Professionals](#) .

5. Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides 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 launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers

6. Children who are absent from education and Children Missing Education (CME)

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, female genital mutilation (FGM) or forced marriage.

There are many circumstances where a child may become absent 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 Female Genital Mutilation.
- Come from Gypsy, Roma, or Traveller families.

- Come from the families of service personnel.
- Are absent 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 absent 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 absent from education in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

7. Children with a family member in prison

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

8. 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 two.

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

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

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

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

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 9 of this policy, as appropriate. In particular, section 11.1 and 11.2 set out more detail about each 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.

9. Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [Cyber Choices](#), ['NPCC- When to call the Police'](#) and National Cyber Security Centre - [NCSC.GOV.UK](https://www.ncsc.gov.uk)

10. Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces 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. 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. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.. 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 sexual identity, age, ethnicity, socio-economic 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 form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. (Keeping Children Safe in Education 2025 page 154) [Domestic-Abuse-Toolkit-May-2021.pdf \(southglos.gov.uk\)](#)

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.

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990 (charged at local rate).

National Domestic Abuse Helpline - Refuge runs the which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

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

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safe Young Lives: Young people and domestic abuse | Safelives](#)
- [Domestic abuse: specialist sources of support](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

[Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

11. Homelessness

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

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

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

12. Mental Health

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, attendance and progress at school.

More information can be found in the [Mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England. 149 has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Better Health Every Mind Matters](#) for links to all materials and lesson plans.

13. Modern Slavery and the National referral mechanism

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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. [Modern slavery: how to identify and support victims - GOV.UK](#)

14. Preventing radicalisation and The PREVENT DUTY

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

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence.
- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or

- Seriously interferes or disrupts an electronic system.

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

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are [factors that may indicate concern](#).

15. The PREVENT Duty

As part of the Counter Terrorism and Security Act 2015, schools have a duty to ‘prevent people being drawn into terrorism’. This has become known as the ‘Prevent Duty’. Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL / DDSL [making a Prevent referral](#), following the [Prevent duty guidance: England and Wales \(2023\) - GOV.UK](#)

Our schools have a duty to prevent children from being involved with or supporting terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our schools being 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 our schools 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.

16. Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

The DSL/DDSL should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the ‘Channel’ programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#) and [Channel training from the Home Office](#).

Additional support.

Further guidance can be found at;

[The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK](#)

The government website [Educate Against Hate - Prevent Radicalisation & Extremism](#) is designed to support schools and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help staff identify and address the risks, as well as build resilience to radicalisation.

It is important to note, that children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination themselves and that these signs can also be part of normal teenage behaviour, or linked to the child's special educational needs and/or difficulties.

Staff should have confidence in their instincts and seek advice via the DSL initially, if something feels wrong. The DSLs will seek further advice, as appropriate, from external professionals, using this guidance.

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

17. Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.
- Regularly review decisions and actions, and update policies with lessons learnt.

- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 9 of this policy, as appropriate. In particular, section sets out more detail about our schools approach to this type of abuse.

18. Serious violence

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

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

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

- Being male.
- Having been frequently absent or permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.
- Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

A fuller list of risk factors can be found in the [Home Office's Serious Violence Strategy](#).

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's [Criminal exploitation of children and vulnerable adults: county lines guidance](#). The [Youth Endowment Fund \(YEF\) Toolkit](#) sets out the evidence for what works in preventing young people from becoming involved in violence.

19. So-called 'honour-based' abuse including Female Genital Mutilation (FGM) and forced marriage

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

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

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

20. Female Genital Mutilation (FGM)

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the DSL and children's social care to seek reporting advice. The duty does not apply in relation to at risk or suspected cases. All other staff should share concerns directly with the Designated Safeguarding Lead and do not need to contact the police personally.

The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#)

Section 9.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

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.

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 absent from 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.

21. Forced marriage

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

It is 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 Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose](#): government guidance on forced marriage - GOV.UK (www.gov.uk)

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- **Seek advice from the Forced Marriage Unit on 020 7008 0151 or email fmu@fco.gov.uk**
- Refer the pupil to further support where appropriate

22. Additional advice and support

There is a wealth of additional information available to support schools via [KCSIE pages 163 - 170](#)

This includes information on all of the above categories plus other numerous other guidance documents and links to toolkits and support organisations. For example:

- Abuse including Faith based abuse
- Bullying
- Children missing from education, home or care
- Children with family members in prison and children of offenders
- Child exploitation
- Confidentiality and Gillick competency Fraser guidelines
- Drugs
- FGM
- Health and well being including fabricated illness
- Homelessness
- Information sharing
- On line safety including emotive education and parental support
- Private Fostering
- Radicalisation
- Serious violence
- Specialist organisations
- Harmful sexual behaviour -including the Lucy Faithfull Foundation [‘Shore Space’](#), resource which works to prevent harmful sexual behaviour.
- Support for victims
- Toolkits
- Sharing nudes and semi nude images
- Support for parents/carers

Appendix 3 – Flow diagrams

Figure A – Summary Poster for use in each school.

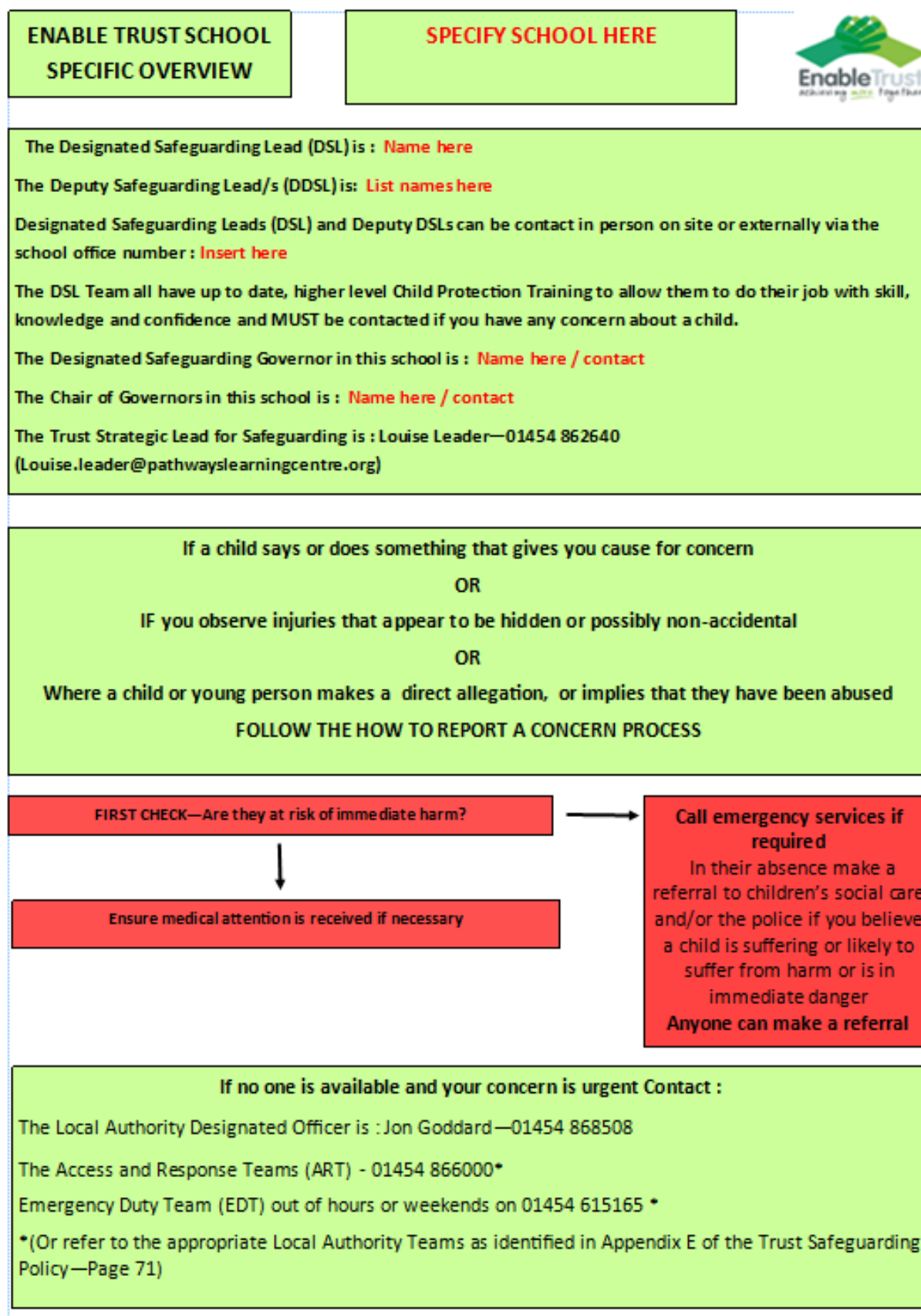


Figure B: Staff procedure if you have concerns about a child's welfare (NOT suffering or likely to suffer from harm, or in immediate danger)

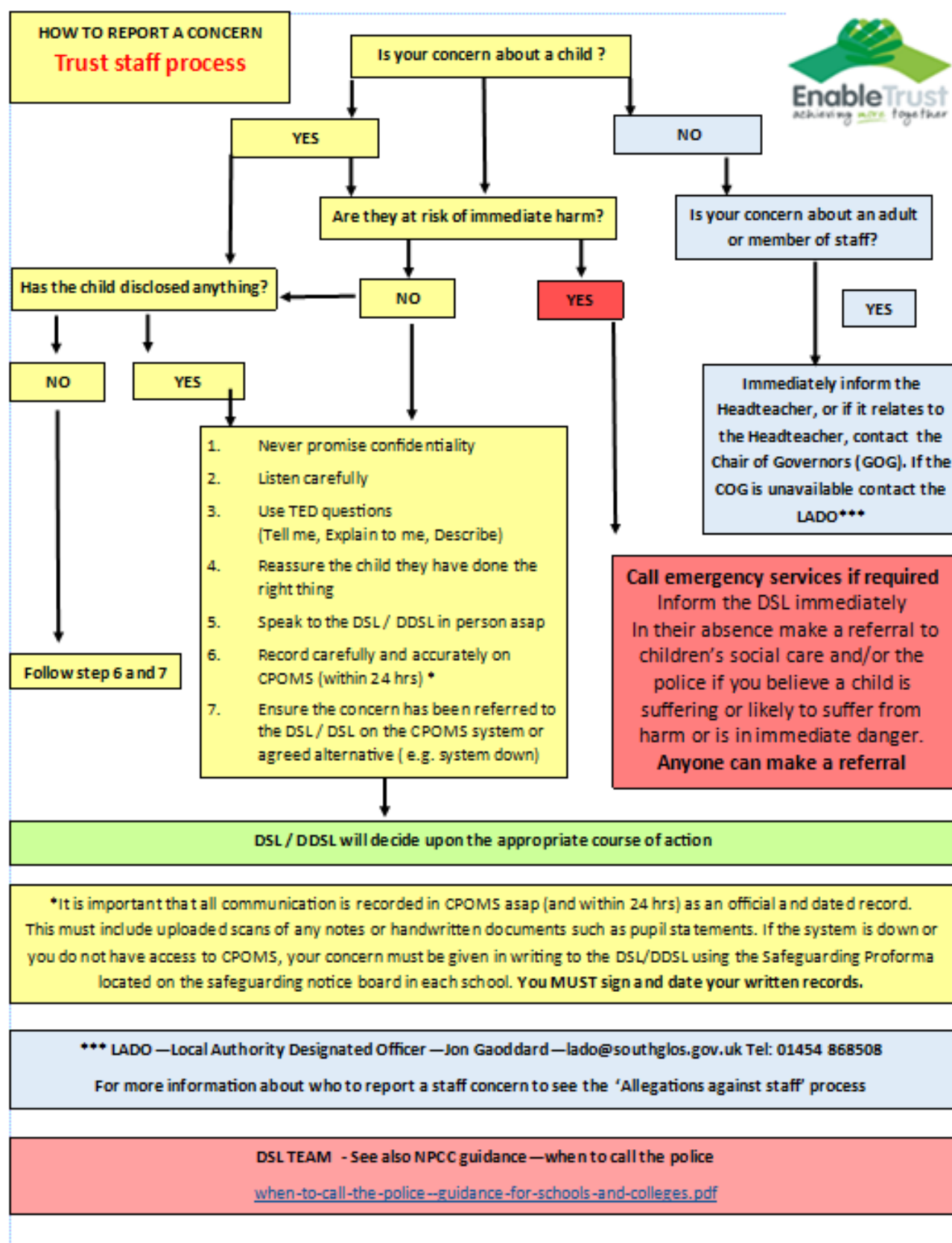


Figure C – Trust DSL / DDSL response to a concern

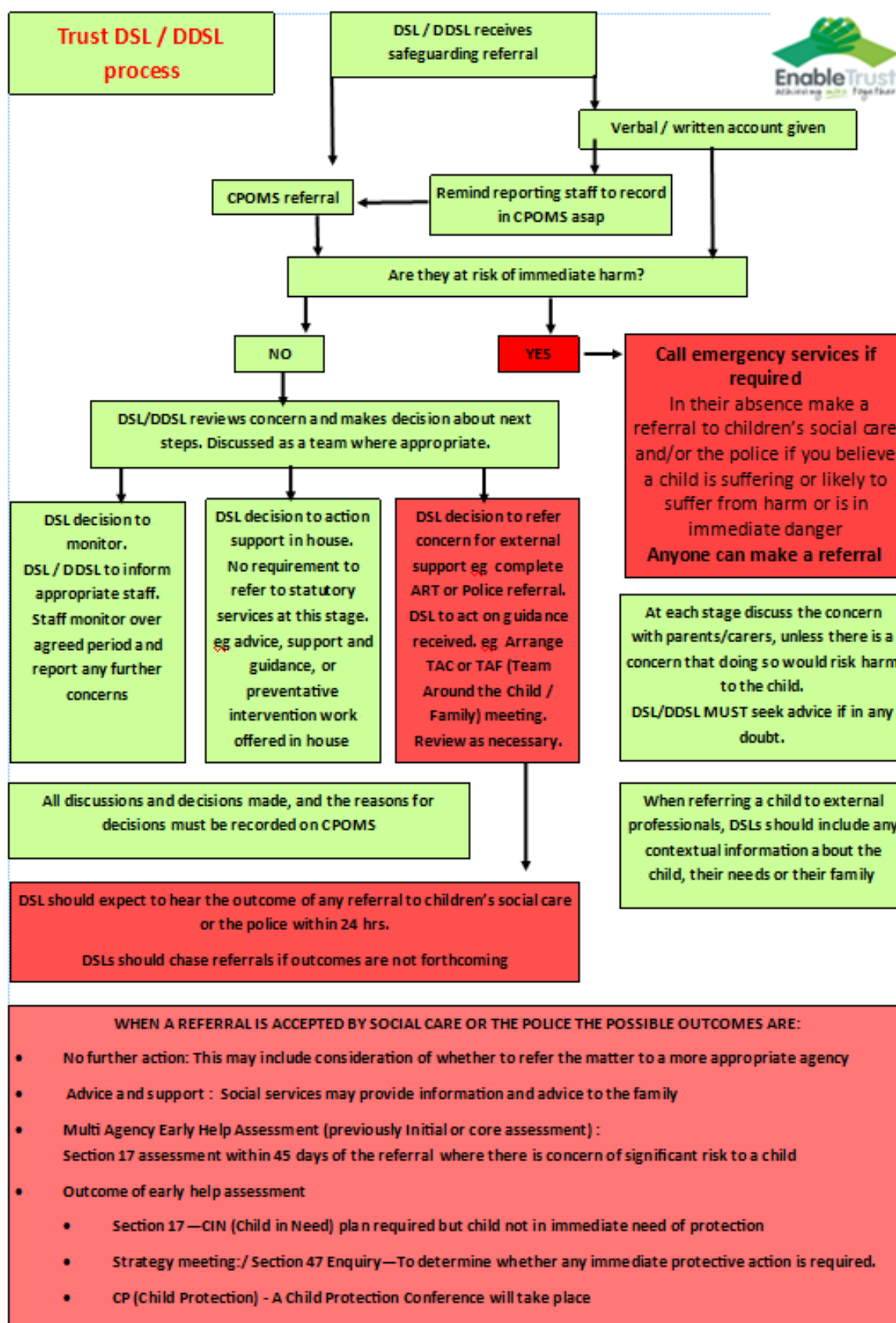
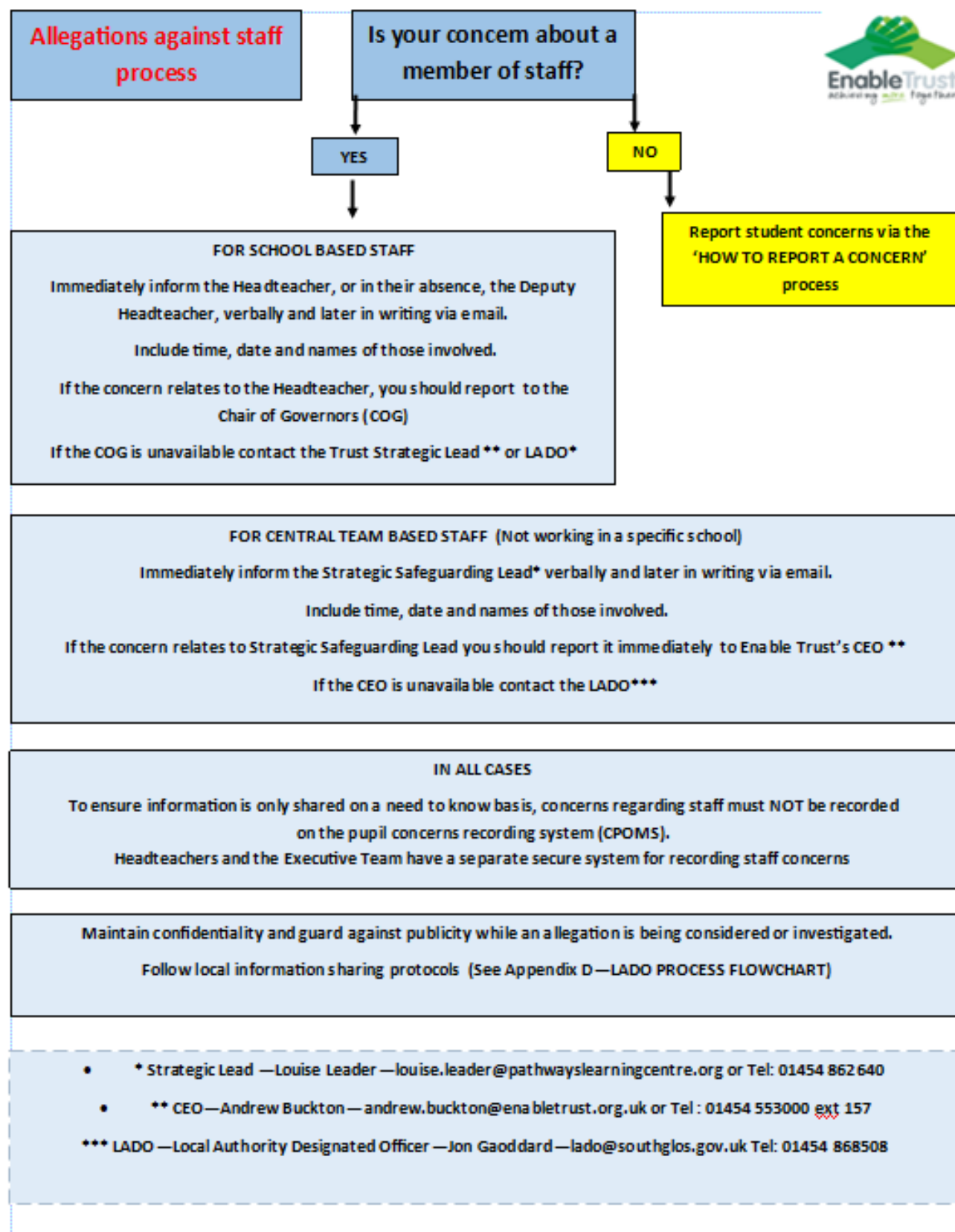


Figure D – Allegations against staff process



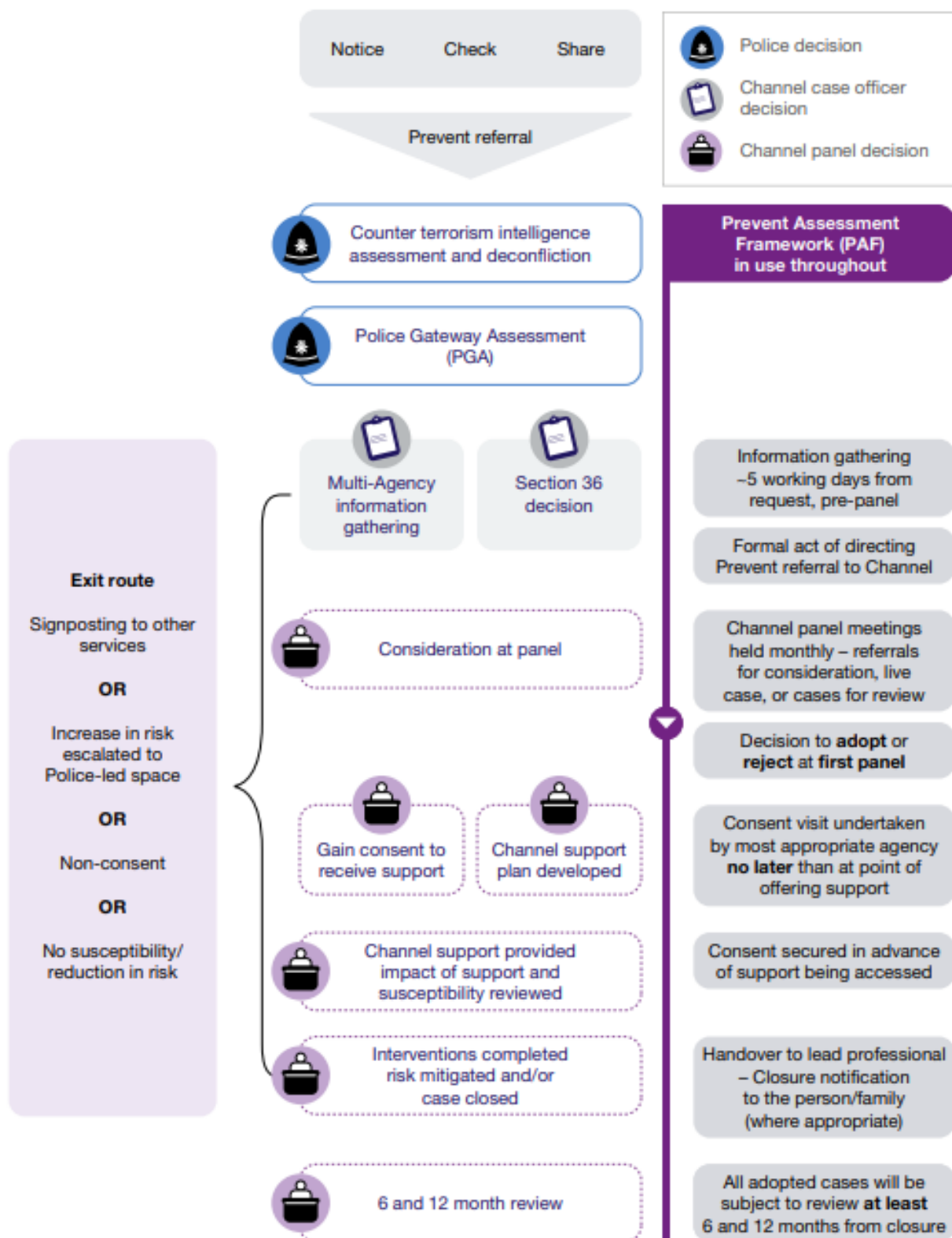
Appendix 4 - External agency key contacts

Safeguarding Concern relevant numbers and links for additional information	Police Find a police force Police.uk	Integrated Commissioning Care Board (ICCB)
<u>South Gloucestershire</u> Access and Response (ART) 01454 866000 – Monday to Friday. Emergency Duty Team (Out of Hours and Weekends) 01454 615165 https://sites.southglos.gov.uk/safeguarding LADO Allegations Management Process SafeguardingSouth Gloucestershire Safeguarding	Avon and Somerset Police	NHS Bristol, North Somerset and South Gloucestershire ICB
<u>Gloucestershire</u> Children and Families Services Helpdesk 01452 426565 (during office hours) (option 3 for a safeguarding concern). 9am and 5pm Monday to Friday Emergency Duty Team (Out of Hours and Weekends) 01452 614194 Gloucestershire Safeguarding Children Partnership Gloucestershire Safeguarding Children's Partnership	Gloucestershire	NHS Gloucestershire ICB

<u>Bristol</u> First Response Team 0117 903 6444 Emergency Duty Team (Out of Hours and Weekends) 01454 615165 Welcome to the Keeping Bristol Safe Partnership website. LADO LADO Concerns Professionals Bristol Referral Form	Avon and Somerset Police	NHS Bristol, North Somerset and South Gloucestershire ICB
<u>Monmouthshire</u> Children's services 01291 635669 Emergency Duty Team (Out of Hours and Weekends) 0800328 4432 Welcome to the Gwent Safeguarding website - Gwent Safeguarding	Gwent Police	Aneurin Bevan University Health Board
<u>Wiltshire</u> Integrated Front Door 0300 456 0108 Emergency Duty Team (after 5 pm Monday-Thursday and after 4 pm on Friday and Weekends) 0300 456 0100 Wiltshire Safeguarding Vulnerable People Partnership (SVPP) - Home page	Wiltshire Police	NHS Bath and North Somerset, Swindon and Wiltshire

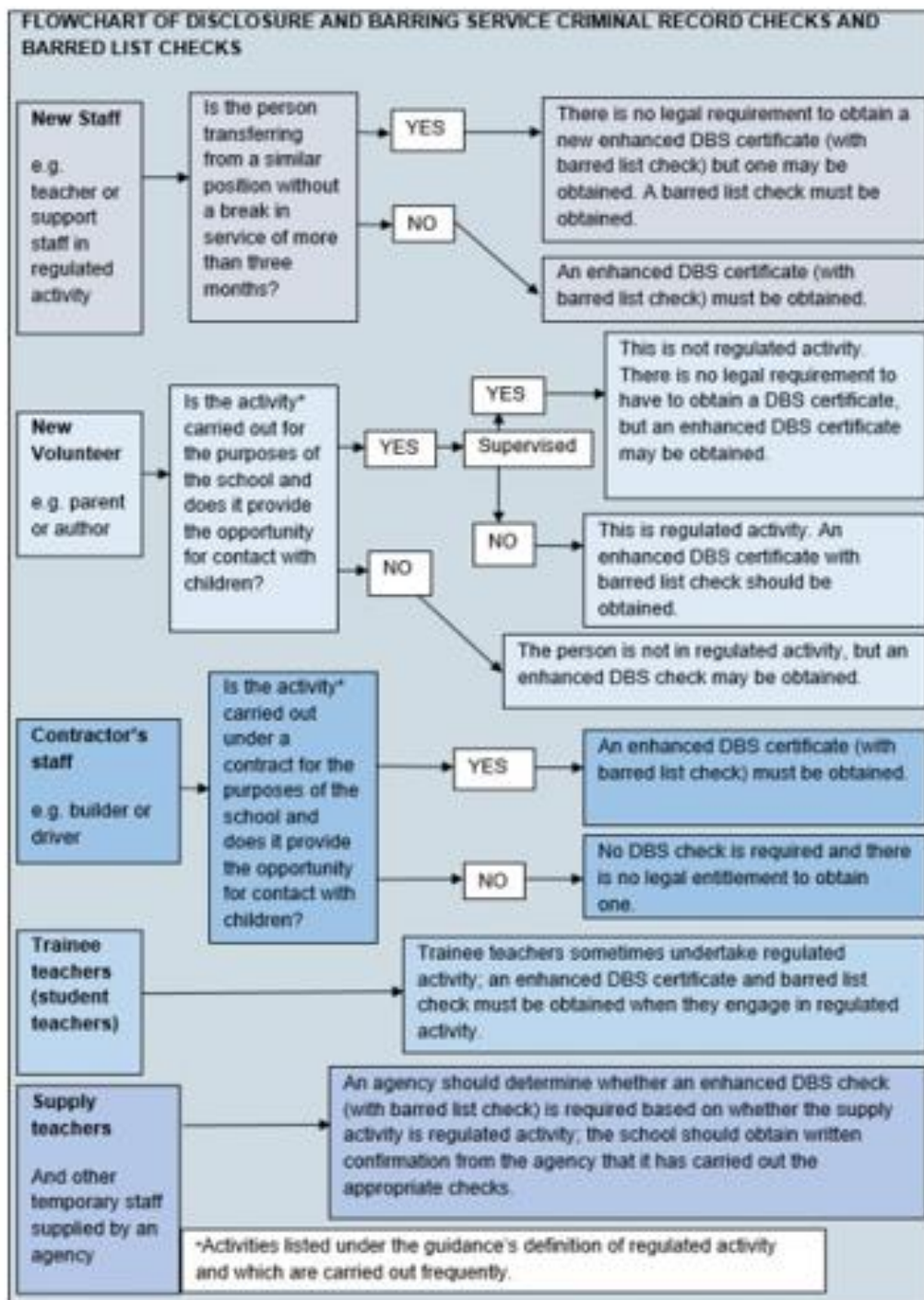
<u>North Somerset</u> 01275 888 808 Emergency Duty Team (Out of hours (after 6pm) and Weekends) 01275 888 808 This number will direct you to the out of hours team. Childrens Safeguarding Partnership Childrens Safeguarding Partnership	Avon and Somerset Police	NHS Bristol, North Somerset and South Gloucestershire ICB
<u>BANES (Bath and North East Somerset)</u> Concerned about a child or young person Emergency Duty Team (Out of Hours and Weekends) 01454 615165 Bath & North East Somerset Community Safety and Safeguarding Partnership (BCSSP) (BathNES) - Bath & North East Somerset Community Safety and Safeguarding Partnership	Avon and Somerset Police	NHS Bath and North Somerset, Swindon and Wiltshire

APPENDIX 5 - Prevent Pathway Diagram ([Channel Duty Guidance: Protecting people susceptible to radicalisation](#))



Appendix 6 – C – DBS criminal record and barring checks

Appendix C Disclosure and Barring Service Criminal Record and Barring Checks



Appendix 6 – D – LADO process flowchart

