Laurel Education Trust

Creating tomorrow's citizens today

CHILD PROTECTION AND SAFEGUARDING POLICY

Latest review:	**December 2025**
Next review:	**December 2026**
Responsible body:	**Board of Trustees**

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Safeguarding policy statement

A whole-school, child-centred approach is fundamental to all aspects of everyday life at The Laurel Education Trust ('the Trust'). In practice this means keeping the child at the centre of decision making in our partnership working with children and their families. As stated in Children Acts 1989 and 2004, the welfare of children is paramount and that they are best looked after within their families, with their parents playing a full part in their lives, unless compulsory intervention in family life is necessary.

We hope that parents and carers appreciate our statutory duty to offer early help support and, depending on the gravity of the situation, protect children in need and who have suffered or otherwise likely to suffer significant harm. The core objective of early help support is to prevent any child from being harmed or placed at risk of harm and therefore halt any escalation where possible.

At The Laurel Education Trust we strive to create a culture which enables children to express their wishes, feelings, and talk about anything that is of importance to them. We believe that every child deserves to receive an education within an environment that feels safe to learn and develop. We want our students, staff, parents and carers to have confidence and trust in our goals and know that collaborative working is fundamental to create and maintain a child-centred approach to safeguarding.

This policy outlines the commitment to our legal duties to safeguard children, the responsibilities for all of our staff and the specific roles and responsibilities for our key Designated Safeguarding Leads and governance.

Important contacts

School	Organisation/Role	Name	Contact details
Simon Balle All-through School	Designated Safeguarding Lead (DSL)	Leon Brown	brownl@simonballe.herts.sch.uk 01992410400
Simon Balle All-through School	Deputy Designated Safeguarding Lead (DDSL)	Rachel Kirk	kirkr@simonballe.herts.sch.uk 01992410400
Simon Balle All-through School	Deputy Designated Safeguarding Lead (DDSL)	Mike Moss	mossm@simonballe.herts.sch.uk 01992410400
Simon Balle All-through School	Deputy Designated Safeguarding Lead (DDSL)	James Pooley	pooleyj@simonballe.herts.sch.uk 01992410400
Simon Balle All-through School	Deputy Designated Safeguarding Lead (DDSL)	Lucy Owen	owenl@simonballe.herts.sch.uk 01992410400

Simon Balle All-through School	Deputy Designated Safeguarding Lead (DDSL)	Amanda Wood	wooda@simonballe.herts.sch.uk 01992410400
Simon Balle All-through School	Deputy Designated Safeguarding Lead (DDSL)	Grace Mizon	mizong@simonballe.herts.sch.uk 01992410400
Simon Balle All-through School	Deputy Designated Safeguarding Lead (DDSL)	Ciaran Prendergast	prendergastc@simonballe.herts.sch.uk 01992410400
Simon Balle All-through School	Deputy Designated Safeguarding Lead (DDSL)	Bradley East	eastb@simonballe.herts.sch.uk 01992410400
Simon Balle All-through School	Designated Teacher for Children Looked After	Tom Joyce	joycet@simonballe.herts.sch.uk 01992410400
Simon Balle All-through School	Mental Health Lead	James Pooley	pooleyj@simonballe.herts.sch.uk 01992410400
Simon Balle All-through School	Prevent Lead	Leon Brown	brownl@simonballe.herts.sch.uk 01992410400
Simon Balle All-through School	Chair of Governors	Adam Cooper	coopera@simonballe.herts.sch.uk
Simon Balle All-through School	Vice Chair of Governors	Sarah Mansfield	mansfields@simonballe.herts.sch.uk
Simon Balle All-through School	Link Safeguarding Governor/ Trustee	Priya Khambhaita	khambhaitap@simonballe.herts.sch.uk
Mill Mead School	Designated Safeguarding Lead (DSL)	Rachael Walsh	head@millmead.herts.sch.uk
Mill Mead School	Deputy Designated Safeguarding Lead (DDSL)	Helen Newman	senco@millmead.herts.sch.uk
Mill Mead School	Chair of Governors	Alistair Ayres	ayres.a@millmead.herts.sch.uk
Mill Mead School	Link Safeguarding Governor	Jenni Voskanian	voskanian.j@millmead.herts.sch.uk

	Local authority designated officer (LADO)	Kassiane Papageorgiou	01992556979
	Channel helpline		020 7340 7264

Aims

The Trust 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.

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), the Maintained Schools Governance Guide and Academy Trust Governance Guide. We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners.

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 students at the school.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.

- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR) .
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Co-Headteachers should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show it's proportionate). This includes making reasonable adjustments for disabled students. 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 student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

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

Definitions

Safeguarding and promoting the welfare of children means:

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

- Taking action to enable all children to have the best outcomes.

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

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

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

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 also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

The following three **safeguarding partners** are identified in Keeping Children Safe in Education 2025 (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

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

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.

Equality statement

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions.
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality .
- Have English as an additional language (EAL).
- 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 female genital mutilation (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.
- Are missing or absent from education for prolonged periods and/or repeat occasions.
- Patterns of absence or reduced timetable that may indicate unmet need or risk, triggering early help and CME processes.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers, trustees and governors in the Trust and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities. This policy also applies across all phases (including EYFS) and addresses mixed-age interactions (e.g., shared spaces, transport, clubs) and transition points. Procedures also cover homestay or hosting arrangements where relevant.

Schools in the Trust play a crucial role in preventative education. This is in the context of a whole-school approach to preparing students 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 policy
- Pastoral support system

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

All staff

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- 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).

All staff will be aware of:

- Our systems that support safeguarding, including this Child Protection and Safeguarding Policy, the staff Code of Conduct, the school's Behaviour for Learning Policy, the Monitoring and Filtering Policy, the role and identity of the designated safeguarding lead (DSL) and deputies and the safeguarding response to children who go missing from education.
- The early help assessment process (sometimes known as the common assessment framework) 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, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.
- That a child and their family may be experiencing multiple needs at the same time.
- What to look for to identify children who need help or protection .

The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. The DSL at Simon Balle is Leon Brown. The DSL at Mill Mead is Rachael Walsh. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online.

DSL and IT lead meet termly to review alerts, trends and staff/student training.

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

The DSL at Simon Balle can be contacted out of school via brownl@simonballe.herts.sch.uk. At MillMead, the DSL can be contacted on head@millmead.herts.sch.uk.

The safeguarding team includes DDSLs, who, at Simon Balle are: James Pooley, Lucy Owen, Mike Moss, Rachel Kirk, Grace Mizon, Bradley East, Ciaran Prendergast, Katie Boyce, Mandy Wood and Tom Joyce. At Mill Mead, the DDSL is Helen Newman.

The DSL and deputies will act as cover for each other (for example, during out-of-hours/out-of-term activities).

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

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

The DSL will also:

- Keep the school leader informed of any issues.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search .

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

The Trust

The Trust will:

- Facilitate a whole-Trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.

- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the school leaders to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the school's local multi-agency safeguarding arrangements.
- Appoint a link Trustee to monitor the effectiveness of this policy in conjunction with the Local Governing Body. This is always a different person from the DSL.

The Local Governing Body:

The Local Governing Body will:

- 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 that 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.
    - Publish a parent summary each year explaining how our filtering/monitoring works, its limitations, and how families can support safe use at home.
    - Complete an annual technical and safeguarding review of filtering/monitoring, evidencing actions taken, and ensure the DSL understands alerts and triage pathways.

    Ensure the following:

    - 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 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).

- 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 on school premises (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 .

Trustees and Governors:

The Chair of Governors and/or Chair of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the school leader and/or CEOs, where appropriate.

All trustees and governors will read Keeping Children Safe in Education annually.

The school leader

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

- Are informed of our systems that 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. and publish on our website a plain-English summary of our online-safety arrangements (including filtering/monitoring) and how parents/carers can help at home."
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.
- Ensuring the relevant staffing ratios are met, where applicable.
- Making sure each child in the Early Years Foundation Stage is assigned a key person.
- Overseeing the safe use of technology, mobile phones and cameras in the setting.

Virtual school heads

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

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

Confidentiality

The Data Protection Act (DPA) 2018 does not prevent or limit the sharing of information for the purposes of keeping children safe. The Trust recognises that timely information sharing is essential for 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. Staff should never promise a child that they will not tell anyone about a safeguarding disclosure, as this may not be in the child's best interests.

The following principles apply to the Trust's confidentiality agreement:

- Timely information sharing is essential to effective safeguarding.
- The Data Protection Act (DPA) 2018 and the UK GDPR does 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:
    - Even if a victim doesn't consent to sharing information, staff may still lawfully share it if there is another legal basis under the Data Protection Act that applies.

- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
- The DSL should consider the following points:
    - 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 where the child resides.
    - 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.

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.
- The government's information sharing advice for safeguarding practitioners includes seven 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
    - **1. Remember that the Data Protection Act and UK GDPR are *not* barriers to sharing information.**
    - **2. Be open and honest with the individual (and/or their family) from the start**
    - **3. Seek advice if you are in any doubt**
    - **4. Share with consent where appropriate - but you do *not* need consent to share if a child is at risk.**
    - **5. Consider safety and well-being**
    - **6. Ensure the information you share is necessary, proportionate, relevant, accurate, timely and secure.**
    - **7. Keep a record of what you have shared, with whom, and why.**

- Confidentiality is also addressed in this policy with respect to record keeping and allegations of abuse against staff.

If staff are in any doubt about sharing information, they should speak to the DSL (or deputies).

Recognising abuse and taking action

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

- Is disabled;
- has special educational needs (whether or not they have a statutory education health and care (EHC) plan);
- is a young carer;
- is bereaved;
- is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime.
- Is frequently missing/goes missing from education, care or home.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- Is at risk of being radicalised or exploited.
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol .
- Is suffering from mental ill health.
- Has returned home to their family from care.
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage.
- Is a CLA
- Is a privately fostered child.
- Has a parent or carer in custody or is affected by parental offending.
- Is missing education, or persistently absent from school, or not in receipt of full-time education.

- Has experienced multiple suspensions and is at risk of, or has been permanently excluded.

Staff, volunteers, governors and trustees 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'.

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

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

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

All staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding concern that meets the threshold for referral to Children's Social Care. For early help intervention (non-CP) see the continuum of need and the Families First Portal.

If a child is suffering or likely to suffer harm, or in immediate danger, DSLs will make referrals in the following way:

1. If the child is at immediate risk of significant harm or likelihood of significant harm they will call Children's Services 0300 123 4043 and / or police 999 and then complete the request for support form specifying their child protection concerns .

2. Alternatively, if not an immediate risk but the child is considered to be suffering or at risk of suffering significant harm they will complete the request for support form, specifying their child protection concerns. Anyone can make a referral to Police and/or Children's Services therefore, we expect all staff and volunteers in our school community to act immediately and not delay if they consider a child to be in immediate danger using the pathways below.

For non-DSLs to make a referral to Children's Social Care:

Call 0300 123 4043 followed by a request for support form. The staff member must inform the DSL as soon as possible.

To contact the Police, call 999 if urgent, if not urgent call 101.

If a child resides in a neighbouring Local Authority (out of Hertfordshire County) the GOV.UK webpage for reporting child abuse to your local council (Report child abuse to a local council) is accessible to assist staff.

Concerns about a child (not considered to be suffering harm, at risk of suffering harm or in immediate danger)

"KCSIE (2025) emphasises that timely and appropriate information sharing is essential for identifying needs early and ensuring children receive effective support." . Where staff have a

concern for a child which does not indicate that they are suffering or likely to suffer immediate harm or in immediate danger they should raise a concern utilising the CPOMS system. Staff and volunteers who do not have access to CPOMS are required to use a concerns form or use the Safeguarding QR code, where appropriate, to access a concerns form and report on. All staff who do not have access to CPOMS receive appropriate training on how to access a concerns form.

Upon receipt of the Record of Concern, the DSL (or deputy DSL) should consult Hertfordshire's Continuum of Need or, if needed, seek further consultation to consider an appropriate level of response to take. The DSL (or Deputy) should acknowledge the concern and feedback wherever appropriate. Staff must not assume that action has been taken unless they have received feedback from the DSL (or deputy DSL) who responded.

If a child makes a disclosure to you

All staff are aware they should be prepared, when possible, as children can disclose spontaneously.

We consider the term 'the child's voice' to represent not only what children say directly, but rather the many ways that children communicate with us, including both verbal and non-verbal communication. The child's lived experience means seeing and understanding their experiences from their point of view. Our staff understand that it is very important to always record exactly what a child has said rather than interpret this from an adult/their own perspective. The Trust is situated within Hertfordshire County which has a rich and diverse population, we cannot and do not assume that all children and their families will have English as their first language nor may a child with SEND have speech or language ability to convey verbally any difficulties they may experience without aids and methods to facilitate their voice. Therefore, our staff give careful consideration to knowing that a child 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.

All staff in the Trust must ensure that no child is ever made to feel that they are 'any trouble' if they need time and space to share their worries with staff.

The Trust's culture of safeguarding endorses the following principles of meaningful engagement with children to include:

Listen

- Be patient – a child may be finding it hard to find the words to express themselves. Let them tell their story in their own words

- Do not interrogate – you may 'taint' evidence by asking leading questions or suggesting what may have happened. Maintain your professional curiosity, ask open-ended prompts.

Reassure

- Reassure the child they are not in trouble and that they have done the right thing in telling you.
- Do not tell the child they should have told you sooner.
- Reassure the child that it is not their fault – victims can often be blamed by their abusers.
- Do not promise confidentiality – if the child asks you to keep it a secret, explain who you need to tell to keep them safe, if appropriate.
- Explain to the child that you will have to share the information and explain what may happen next.

Stay calm

- Try not to panic, be aware of your own reactions and feelings, avoid showing shock, anger, or disgust.
- Do not insult the alleged abuser, however frustrated you may privately feel. Children can be very protective of people they care about, even if that person is abusing them.

Report

- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to Children's Social Care and/or the Police directly. Prioritise this above all other work.
- Inform the DSL of your actions as soon as possible.
- Do not disclose any information to anyone aside from those within your DSL team, unless you are told to do so by a relevant agency involved in the safeguarding process.

Reporting systems for children

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

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when assessing information, considering necessary actions and any subsequent implementation of advice or support.

To achieve this, we have:

- Clear systems in place for children to report abuse, knowing they will be listened to and supported.
- Simon Balle All-through School utilises 'Tell Us' reporting concerns. This is well promoted and understood by the children so they can easily report concerns via this pathway should they wish.
- A clear culture and ethos in our Trust that promotes taking concerns seriously, and offers children opportunities to safely express their views and any worries they may have.

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

Keeping Children Safe in Education (2025) 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 student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in Appendix 2 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. In rare cases, the police or children's social care may instruct the school not to disclose information to parents or others if doing so could place the child at greater risk or compromise an investigation. They should also discuss the case with the DSL.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student 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 student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

Any member of staff who suspects a student is at risk of FGM or suspects that FGM has been carried out or discovers that a student **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

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)

Figure 1 below 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.

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

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

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.

The school or trust 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.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

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

The local authority will make a decision within one 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.

If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a Deputy DSL 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 the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

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

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

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

If you have a concern about mental health

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

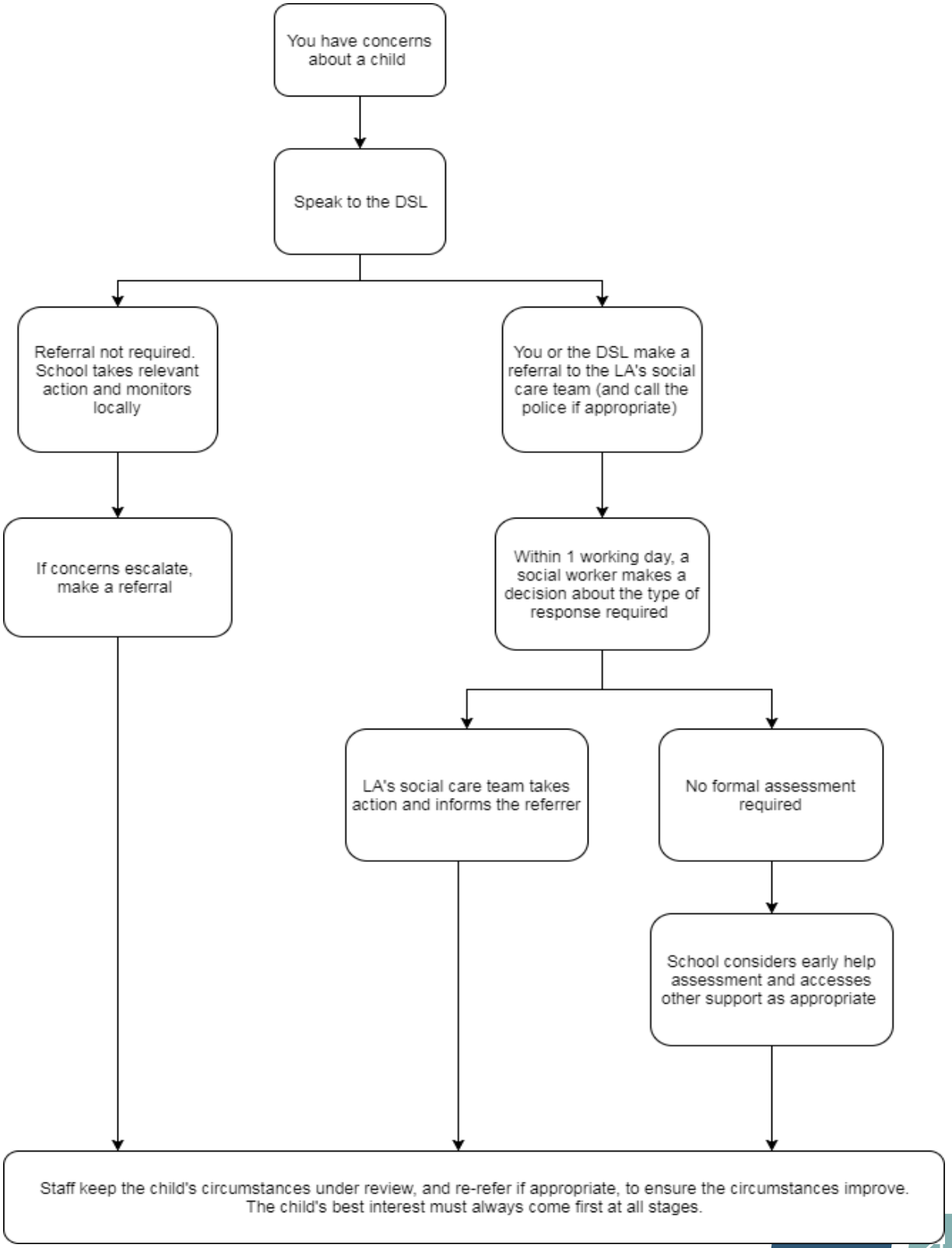
Ensuring that all children feel safe and know how to look after and respect themselves is of paramount importance. They need to understand and identify their own safety nets and support when things invariably are challenging. Our dedicated safeguarding team receive regular professional development and work closely with external agencies to support young people who are in particular need. In addition,some staff have been trained as 'Mental Health First Aiders'. All 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.

Heads of Year and Phase Leaders are responsible for the wellbeing and academic achievement of the children. Further support and guidance is also provided by the senior leadership team and support staff.

We utilise wellbeing surveys using Bounce Together for students in Years 5 -13 throughout the year to help identify and support any students that may be struggling. In the Primary Phase through our PSHE programme we give opportunities for children to identify their trusted adults.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in the section above. If you have a mental health concern that is not also a safeguarding concern, speak to the DSL / Deputy DSL/ mental health lead to agree a course of action.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger). If the DSL is unavailable, this should not delay action. See the section above for what to do.



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

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the school leader as soon as possible. If the concerns/allegations are about the school headteacher, speak to the Chair of Governors or CEO. If the concern is about the CEOs, speak to the Chair of the Trust.

The school leader/Chair of Governors/CEO will then follow the procedures set out in Appendix 3 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, volunteer or contractor) to the school leader, report it directly to the local authority designated officer (LADO).

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

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

Levels of Concern and Allegations
There are two levels of Concerns and Allegations relating to adults (in both paid and voluntary roles) working with children either directly and/or online:

1. Low-Level Concerns
   These are behaviours by one or more adults (paid or voluntary) which are inconsistent with Laurel Trust's Code of Conduct but do not meet the Harm Threshold and are referred to as 'Low-Level Concerns'. Examples include repeated breaches of Laurel Trust's Code of Conduct in relation to safeguarding.
2. Allegations
   These are behaviours by one or more adults (paid or voluntary) that do meet or may meet the Harm Threshold (see above under definition of Allegations). Such cases require referral within one working day to the Local Authority Designated Officer (LADO) and potentially other statutory bodies such as the police or children's social care.

Low-Level Concerns and Allegations may emerge as a result of either observed suspicions or direct disclosures made by a child. In assessing the potential harm and impact to a child or young person, DSLs will consider the four categories of abuse – physical, emotional, sexual and neglect – as well as any safeguarding elements related to exploitation. Detailed definitions of these terms can be found in Chapters 4 and 9 on this policy.

The Harm Test is explained in the Disclosure and Barring service Guidance: Making barring referrals to the DBS and Section 31(9) of the Children Act 1989 (as amended by the Adoption and Children Act 2002).

Managing Low-Level Concerns (those that DO NOT meet the Harm Threshold for Allegation)

As part of our Trust approach to safeguarding, we are committed to fostering an open and transparent culture where all concerns involving adults working in or on behalf of Trust (including supply teachers, volunteers, and contractors) are addressed promptly and

appropriately. Creating an environment where all concerns can be shared responsibly, with the right person, recorded accurately, and handled with care is essential to keeping our children and young people safe.

We aim to:

- Enable all stake holders to identify inappropriate, problematic, or concerning behaviour early and encourage them to do so.
- Reduce the risk of abuse by acting preventatively.
- Ensure that all adults working/volunteering in or on behalf of our school understand and adhere to professional boundaries consistent with our ethos and values at Laurel Trust

A 'Low-Level' Concern does not imply insignificance. It refers to any behaviour – however minor – that causes a sense of unease or a 'nagging doubt' about whether an adult's behaviour:

- Is inconsistent with Trust's staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples may include (but are not limited to):

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- Humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; disclosure made by a child, parent or other adult within or outside of the organisation; as a result of vetting checks undertaken.

The role of the Case Manager for Low-Level Concerns

The Case Manager is the Headteacher. If concerns involve the Headteacher, the Chair of Governors fulfils this role.

When a Low-Level Concern is raised (including third-party reports), the Case Manager or their nominated deputy will:

- Speak with the person who raised the concern (unless this was raised anonymously)
- Speak with the individual subject to the concern
- Identify and interview any other involved parties or witnesses

The information gathered will help us to categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded in writing along with the rationale for our decisions and action taken. The Case Manager, a nominated deputy, Chair of Governors or Chair of the Trust, will respond to reports of Low-Level Concerns in-line with the schools' internal due processes for managing safe-staffing, our response may include the following:

- Prioritise the safety and wellbeing of any alleged victim and all other pupils
- Share details only with those who need to know to maintain confidentiality
- Conduct further inquiries with relevant children, staff, parents, or witnesses

- If there are reasonable grounds, launch a formal internal investigation following the school's internal processes
- Consult Human Resources on possible breaches of the code of conduct, Teachers' Standards, or TA regulations to assess disciplinary thresholds
- Inform the subject of the concerns and outline available support during the inquiry
- Determine when to allow the subject to present their account
- Review all evidence and decide on an outcome
- If no risk of harm is found, consider additional training or monitoring for the staff member
- If new information raises serious risk or meets the harm threshold, refer the matter to the LADO

Trust fosters a safeguarding culture where every staff member is professionally curious. We:

- Clarify expected staff behaviour and help them distinguish it from concerning conduct
- Encourage prompt reporting of Low-Level Concerns
- Address unprofessional behaviour early and support corrective measures
- Handle concerns sensitively and in proportion to their nature
- Use reported concerns to identify and address any weaknesses in our safeguarding systems

Record keeping for Concerns and Allegations

It is vital that our stakeholders know how to share information about concerns for professionals and volunteers working with children. To ensure safe working practice:

- All staff and volunteers must record the details of the Low-Level Concerns and submit them to the Headteacher. Information from both Simon Balle and Millmead will be recorded in a separate Google Sheets for consistency.
- Records are confidential, stored securely, and comply with the Data Protection Act 2018 and UK GDPR
- If a pattern of inappropriate behaviour emerges, the Case Manager will decide on disciplinary action, or if the Harm Threshold is reached, refer to the LADO (per KCSiE (2025) Part Four, Section One)
- We will review and revise relevant policies or training to address any school-culture factors that enabled the behaviour
- Records of concerns are retained by Laurel Trust until the individual reaches retirement-age or for the next ten years, whichever period is longer

Managing Allegations (those that DO MEET the Harm Threshold for LADO)

When concerns/allegations meet the harm threshold Trust is required to comply with both Part Four of KCSiE and Hertfordshire Safeguarding Children Partnership Procedures Manual Section 5.1.5 Managing Allegations Against Adults Who Work With Children and Young People

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

These are Trust procedures for managing cases of concerns/allegations that meet the Harm Threshold and may indicate a person is a risk of harm to children if they continue to work in their present position, or in any capacity with children and young people.

Allegations of abuse made against other students

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 students.

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 students hurting other students will be dealt with under the 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 students in the school at risk;
- is violent;
- involves students 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 for more information about child-on-child abuse.

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

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

- 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.

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 genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate students about appropriate behaviour and consent .
- Ensure students are able to easily and confidently report abuse using our reporting systems.
- Ensure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of 'it could happen here'.
    - 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, gender, ethnicity and/or sexual orientation.
- That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent the school from coming to its own conclusion about what happened and imposing a penalty accordingly. 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 local authority 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 .

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

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 computer-generated images that otherwise appear to be a photograph 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 student 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 student to delete it.

- Ask the student(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 student(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 student(s) that they will receive support and help from the DSL.

Initial review meeting

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 student(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 students 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 students involved (in most cases parents/carers should be involved).

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See Appendix 2 for more information on assessing adult-involved incidents.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN).
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.

- The imagery involves sexual acts and any student in the images or videos is under 13.
- The DSL has reason to believe a student 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 school leader 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.

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 students involved (if appropriate).

If at any point in the process there is a concern that a student 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 student at risk of harm.

Referring to the police

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

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 this policy also apply to recording these incidents.

Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE Curriculum and computing programmes. This is age appropriate to the year group/key stage. 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.

Students also learn the strategies and skills needed to manage:

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

This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the school will follow in the event of an incident.

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

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

Reporting systems for our students

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 students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for students to confidently report abuse. There are specific schools systems for this, which includes 'Tell Us' at Simon Balle.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for students .
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback . The Trust signposts students to CEOP Education for online safety and reporting routes, and to the Lucy Faithfull Foundation (e.g., Shore Space) for confidential support in relation to sexual images and harmful sexual behaviour, alongside local services.

Online safety and the use of mobile technology

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

To address this, the Trust aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff, volunteers, governors and trustees.
- 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. We recognise many students have direct internet access via 3G/4G/5G which can bypass school filters. Our expectations and education therefore cover device use on and off site, and we work with parents/carers to reinforce safe use at home.
- Mis/disinformation. Our teaching addresses misinformation, disinformation and conspiracy theories as online harms within the 4Cs framework.ns, where appropriate.

The four key categories of risk

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

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism.

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

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

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

- Educate students 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 students are encouraged to do so, including where they're a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with 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 students are not present.
    - Staff will not take pictures or recordings of students on their personal phones or cameras.
- Make all students, 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 student is in breach of our policies on the acceptable use of the internet and mobile phones .
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- 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, mobile phone use, and the use of cameras within our setting. To ensure the safety and well-being of all children, mobile phones

and cameras are strictly regulated, and their use is limited to specific, approved purposes. Staff and visitors are expected to follow clear guidelines regarding the use of mobile phones and cameras, both to protect children's privacy and to prevent inappropriate use. Visitors are reminded of expectations through our sign-in systems at both Trust schools. For full details on our policy regarding mobile phone use and online safety, please refer to the relevant sections of this child protection policy.

For full details about our school's policies in these areas, please refer to our Online Safety and Behaviour Policy.

Artificial intelligence (AI)

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

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

The Trust will treat any use of AI to access harmful content or bully students in line with this policy and schools' Anti-bullying/Behaviour Policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

The Trust We will risk-assess AI tools before use with students, avoid uploading personal/sensitive data, and provide age-appropriate teaching on deepfakes, grooming risks and the reliability of AI outputs. Staff seeking to pilot a new AI tool must consult the DSL and IT lead for a safeguarding and data-protection check. Please refer to the AI policy in relation to clear parameters around not uploading personal, sensitive or confidential data to AI.

Notifying parents or carers

Where appropriate, and unless there is risk of harm or further harm to a young person, 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).

Students with special educational needs, disabilities or health issues

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

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

The SEND Information Report is updated annually and can be found on the school website.

Inclusion policy (SEND)

Special educational needs and disability code of practice: 0 to 25 years

Any abuse involving students with SEND will require close liaison with the DSL (or deputy) and the SENCO.

Students with a social worker

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

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

Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL has details of children's social workers and relevant virtual school heads.

At Simon Balle we have appointed a designated teacher, Tom Joyce (DDSL/Assistant Headteacher), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. At Mill Mead this role is fulfilled by the headteacher, Rachael Walsh.

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 student premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

We recognise the role of the Virtual School Head (VSH) in supporting children with a social worker, including those in kinship care. The DSL and designated teacher will liaise with the VSH to promote attendance, attainment and inclusion, and to target support.

Students who are lesbian, gay, bisexual or gender questioning

We recognise that students who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our Behaviour 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 and Equality Diversity and Inclusion Lead, where appropriate. When families/carers are making decisions about support for gender questioning students, 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 student, we will take a cautious approach as there are still unknowns around the impact of social transition, and a student may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

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 student). 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 students can speak out or share their concerns with members of staff.

Complaints and concerns about school safeguarding policies

Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

Other complaints

Our Trust has a clear and robust process in place for handling safeguarding-related complaints, whether they concern students, staff, or the premises. Any complaint related to safeguarding will be treated with the utmost seriousness and will be investigated promptly to ensure the safety and well-being of all students. Complaints can be raised by parents, staff, or students themselves, and will initially be directed to a designated safeguarding lead (DSL/DDSL). The

DSL/DDSL will ensure that the complaint is reviewed thoroughly, with appropriate actions taken to address any concerns, while maintaining confidentiality where necessary.

In cases where complaints pertain to the Early Years setting, we comply with the statutory framework for the Early Years Foundation Stage (EYFS), specifically paragraph 3.75. This outlines that all early years providers must have clear procedures for handling complaints related to safeguarding, and the school ensures these complaints are recorded and resolved in line with legal requirements. Parents will be informed of the outcome, and if the matter cannot be resolved internally, they will be advised on how to escalate the issue to the appropriate regulatory body. The school maintains a commitment to transparent, effective procedures that ensure all children are safeguarded from harm.

Whistleblowing

The school leader is responsible for ensuring that all safeguarding concerns, including those raised about school policies or practices, are taken seriously and addressed promptly. Staff and volunteers are encouraged to report concerns in line with the trust's Whistleblowing Policy, which provides a clear and confidential mechanism for raising issues that might otherwise go unreported. This includes concerns about the conduct of colleagues or potential failures in safeguarding practices, ensuring the safety and well-being of all students remains a priority.

Record keeping

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

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

Records will include:

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

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

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

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

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 student file.

To allow the new school/college to have support in place when the child arrives, this should be within five days for an in-year transfer, or the first 5 days of the start of a new term.

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.

Safeguarding record-keeping arrangements:

- Records will be held electronically using CPOMS.
- Where appropriate hard copies are held securely by the DSL.
- Two-step verification for CPOMS log ins.
- Locked cabinet in secure office.
- All information is held on until transition or alternatively archived with school records.
- The school leader and DSL/DDSL have access to records.
- The school shares information on a need to know basis and in line with all guidance set out both locally and nationally.

Training

All staff

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the 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 students.

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

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

Volunteers will receive appropriate training, if applicable.

The DSL and deputies

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

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, 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.

Governors

All governors 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 Trust to deliver a robust whole-school approach to safeguarding.
- As the Chair of Governors and/or Chair of the Trust may be required to act as the 'case manager' in the event that an allegation of abuse is made against the school leader, they receive training in managing allegations for this purpose.

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.

Staff who have contact with students and families

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

Appendix 1: Types of abuse

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

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually

inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

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

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

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

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

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

Appendix 2: Specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

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

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

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from 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.

Children who are absent from education

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

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

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

Elective Home Education (EHE)

Where parents/carers express an intention to home-educate, we will follow local procedures, discuss safeguarding and curriculum implications, share information with the LA as required.

Children missing from education

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

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

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

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- suffering from changes in emotional wellbeing;
- misusing drugs and alcohol;
- going missing for periods of time or regularly coming home late;
- regularly missing school or education;
- not taking part in education.

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

Child sexual exploitation

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

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

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They

often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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

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

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

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

Child-on-child abuse

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

Our trust has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are 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 this policy as appropriate.

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill-treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

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

Homelessness

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

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

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

So-called 'honour-based' abuse (including FGM and forced marriage)

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

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

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

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.

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 student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/student already being known to social services in relation to other safeguarding issues.
- A girl:
    - having difficulty walking, sitting or standing, or looking uncomfortable.

- Finding it hard to sit still for long periods of time (where this was not a problem previously).
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Having frequent urinary, menstrual or stomach problems.
- Avoiding physical exercise or missing PE.
- Being repeatedly absent from school, or absent for a prolonged period .
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
- Being reluctant to undergo any medical examinations.
- Asking for help, but not being explicit about the problem.
- Talking about pain or discomfort between her legs.

Potential signs that a student 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 ou.t
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- Having a mother, older sibling or cousin who has undergone FGM.
- Having limited level of integration within UK society.
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period.
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion).
- Being unexpectedly absent from school.

- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 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 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

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

The DSL will:

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

Preventing radicalisation

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

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

- Negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results outlined in either of the above points.

Terrorism is an action that:

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

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

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

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

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

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

Staff will be alert to changes in students' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves;
- becoming susceptible to conspiracy theories and feelings of persecution;
- changes in friendship groups and appearance;
- rejecting activities they used to enjoy;
- converting to a new religion;
- isolating themselves from family and friends;
- talking as if from a scripted speech;
- an unwillingness or inability to discuss their views;
- a sudden disrespectful attitude towards others;
- increased levels of anger;
- increased secretiveness, especially around internet use;

- expressions of sympathy for extremist ideologies and groups, or justification of their actions;
- accessing extremist material online, including on Facebook or X;
- possessing extremist literature;
- being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

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

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

Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including in our Curriculum Policy, Behaviour Policy and Online/e-Safety Policy.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between two 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 this policy, as appropriate.

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 student being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

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

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

Visitors are expected to sign in electronically / have a photo and wear a visitor's badge.

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

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

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

Non-collection of children

In our trust, we are committed to ensuring the safety and well-being of all students, including when they are collected from school. Late collection of children is a concern that we take seriously, as it can cause anxiety for both the child and staff. To manage this situation effectively, we have implemented a clear and consistent policy on late collection of children.

This policy outlines the procedures and steps to be taken when a child is not collected on time. It aims to ensure the safety of the child, the well-being of the family, and the efficient use of school resources.

General procedure for late collection

Collection time

Children should be collected promptly at the end of the school day unless prior arrangements have been made with the school.

Parents/carers are responsible for ensuring that children are collected on time. If parents/carers are unable to collect their child on time, they are expected to inform the school in advance.

Initial contact

If a child is not collected within 15 minutes after the end of the school day, the following steps will be taken:

- Contact the parents/carers: The first contact will be made by phone to the parent or emergency contact to check if there has been a delay or if the child has been forgotten.
- Attempt alternative contacts: If the primary contact cannot be reached, the school will attempt to contact other emergency contacts listed on the child's records.

Supervision of the child

- A member of staff will supervise the child in a safe area until the child is collected. The child will be made comfortable and reassured while waiting.
- If the child is still not collected after 30 minutes, the school will begin considering further actions to ensure the child's safety.

Escalation procedure

After one hour of the child not being collected, and if the school has been unable to make contact with the parent or emergency contacts, the school leader or DSL will be informed, and a decision will be made whether to contact local authorities (e.g., the police or social services) for assistance.

Child protection consideration: If there are concerns about the welfare of the child, the school may consider contacting social services to report the situation.

Recording the incident

All incidents of late collection will be logged in a secure record, including the time the child was collected, the reason for the delay (if known), and any communications with parents/carers or authorities.

The school will keep parents/carers informed about the situation, and any delay will be noted on the child's file for reference.

Repeated late collection

If a pattern of late collection emerges (e.g., repeated occurrences or a consistent lateness), the school will initiate further actions, which may include:

- Informing the parents/carers: A meeting with the school leader will be arranged to discuss the issue and explore solutions, such as arranging for an alternative collection arrangement.
- Providing support: The school may recommend services that could assist the parents/carers in ensuring the child is collected on time, such as a childminder or after-school care programs.

- Referral to social services: If late collection is persistent and causes concern for the child's well-being, the school may refer the matter to social services for further investigation and support.

Communication with parents/carers

The school will remind parents/carers regularly of the importance of punctuality for child collection. This will include information at the beginning of each school term, as well as periodic reminders through school newsletters or meetings.

If a child is regularly collected late, a formal letter will be sent to the parents/carers to inform them of the school's concerns and to remind them of the policy.

Expectations of parents/carers

Punctuality: Parents/carers should ensure that their child is collected on time.

Communication: Parents/carers must notify the school in advance if they are going to be late or if alternative collection arrangements are required.

Emergency contacts: Parents/carers should ensure that up-to-date emergency contact details are provided to the school, including the names and phone numbers of trusted individuals who can be contacted if necessary.

Late collection fees: If applicable, the school may implement a late collection fee after a specified amount of time to cover staff costs. This would be clearly communicated in advance.

Staff responsibilities

Staff will supervise any child who is left after school hours, ensuring the child is safe and that all efforts are made to contact the parents/carers.

The senior leadership team will be informed if the child remains uncollected after a reasonable period, and a further response will be arranged accordingly.

All school staff will be trained on how to handle situations of late collection and the procedures to follow.

This section is designed to provide a clear, structured approach to dealing with the late collection of children, ensuring that children are always safe, well-supervised, and returned to their parents or carers as soon as possible. By adhering to these principles,, we aim to maintain a safe and supportive environment for all students and their families.

Missing students

At our all-through school, the safety and well-being of our students is of paramount importance. In the event of a child going missing, we have clear and effective procedures in place to ensure that the child is located and returned to appropriate supervision as quickly as possible.

Procedure for missing person

Immediate action

Search for the child: Once it is established that a child is missing, staff will immediately begin to search the areas where the child was last seen (classroom, playground, hallways, bathrooms, and other common areas).

Alert the appropriate staff: A member of the senior leadership team or the designated safeguarding lead (DSL) will be notified immediately.

Classroom check: Class teachers will confirm the child's attendance on the class register. If the child is absent without prior notice, a member of staff will check with the office or other teachers to see if the child has been signed out or redirected to another area.

Contact other school locations: If the child may have moved to another part of the school (e.g., another building or outdoor area), a senior staff member will coordinate the search.

Notification of parents/carers

Contact the parents/carers: If the child has not been found within a reasonable timeframe (10-15 minutes), the parents/carers will be contacted to alert them about the situation.

Provide updates: Parents will be kept informed about the steps being taken and any new developments. In the event that the child is found, parents will be notified immediately.

Support for parents: If the child is not found within a prolonged period, the school will involve external authorities and ensure that the parents/carers are supported throughout the process.

Supervision of the child

While the search is taking place, a designated member of staff will be assigned to ensure that the remaining children are appropriately supervised. This may involve moving other students to a safe, controlled area away from the search.

If the child is found, they will be escorted back to a safe space under the supervision of a trusted member of staff.

Involving authorities

If the child is not located within a reasonable period or there is concern for their safety, the school will immediately contact local authorities (police and emergency services) to assist with the search.

Report the incident to local authorities: A report will be filed if the child is still missing and no clear reason for the disappearance is identified.

Recording the incident

Document the events: A thorough record of the incident will be created, documenting the following:

- Time the child was last seen.
- Time the missing child was reported.
- Actions taken to locate the child.
- Details of any communications with parents/carers and authorities.
- Time and manner of the child's return or resolution of the situation.

Incident report: The completed documentation will be shared with the Headteacher, safeguarding lead, and other relevant school personnel. A report will be reviewed to ensure that all steps were followed appropriately.

Post-incident review

After the child has been found or the situation is resolved, a review will be conducted to evaluate the effectiveness of the procedure and to identify any areas for improvement.

Safeguarding evaluation: The school will assess whether any safeguarding issues arose, and if necessary, any further steps will be taken to ensure the safety and well-being of the child moving forward.

Staff debrief: Staff involved in the search and resolution process will be debriefed, and any lessons learned will be incorporated into the school's policies or training programs.

Key personnel

Designated Safeguarding Lead (DSL / DDSL): Ensures proper procedures are followed and communicates with authorities if necessary.

School leader: Oversees the response and ensures that all staff are informed and supported.

Senior Leadership Team: Coordinates the search, communicates with parents, and ensures school operations continue smoothly during the incident.

Training

All staff will receive regular training on the procedures for dealing with missing persons, including how to report and handle such incidents. Training will be reviewed annually, and staff will be reminded of procedures during induction and safeguarding briefings.

The procedures outlined above are designed to ensure a swift and effective response if a child goes missing at school. The safety of our students is a priority, and our trust takes all necessary steps to locate and safely return any child who is found to be missing.