



## Child Protection & Safeguarding Policy

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| <b>Updated By:</b> T Rowley-Field | <b>Approved By:</b> M Lees        | <b>Date:</b> Jan 2026 |
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## **Contents**

1. Statement of intent
2. Safeguarding Principles
3. Designated Safeguarding Personnel
4. Definitions
5. Legal Framework
6. Roles and Responsibilities
7. Multi-Agency Working
8. Early Help
9. Operation Encompass
10. Abuse, neglect and exploitation
11. Specific safeguarding issues
12. Child-on-child Abuse
13. Online safety and personal electronic devices
14. Consensual and non-consensual sharing of indecent images and videos
15. Context of safeguarding incidents
16. Pupils potentially at greater risk of harm
17. Extracurricular activities and clubs
18. Concerns about pupils
19. Managing referrals
20. Concerns about school safeguarding practices
21. Safeguarding concerns and allegations of abuse against staff
22. Communication and confidentiality
23. Safer recruitment
24. Single central record (SCR)
25. Training
26. Monitoring and review

### **Appendix A – Specific safeguarding issues**

### **Appendix B – Safeguarding timeline**

### **Appendix C – Key external contacts**

## 1. Statement of Intent

The Shrubbery School is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. The school recognises that safeguarding is fundamental to pupils' wellbeing and educational success and adopts a whole-school, preventative approach to safeguarding.

This policy establishes a clear, detailed framework for safeguarding practice in line with current legislation and statutory guidance. It applies to all pupils, staff, volunteers, proprietors and contractors and reflects the school's commitment to ensuring that safeguarding is embedded into all aspects of school life.

This commitment is achieved by:

- Ensuring that the Proprietor, Headteacher and all staff understand and fulfil their safeguarding responsibilities
- Teaching pupils how to keep themselves safe, recognise unacceptable behaviour and seek support
- Identifying, supporting and protecting pupils who are experiencing or are at risk of abuse, neglect or exploitation
- Maintaining a strong culture of safer recruitment by adopting procedures that help deter, reject or identify people who may pose a risk to children
- Working effectively with safeguarding partners and other agencies
- Ensuring governance oversight, challenge and assurance of safeguarding effectiveness

## 2. Safeguarding Principles

Safeguarding and promoting the welfare of all children, regardless of age, disability, gender, ability, culture, race, language, religion, or sexual identity, is of paramount importance.

### Everyone's Responsibility

Safeguarding is everyone's responsibility. All adults working with children must be alert to concerns, share information appropriately and take prompt action to protect pupils from harm.

### Child-Centred Approach

All safeguarding decisions are made in the best interests of the child. Pupils' wishes, feelings and lived experiences are considered and taken seriously.

### "It Could Happen Here" Culture

Staff are expected to always maintain professional curiosity and vigilance. The school recognises that abuse can occur in any setting and that no organisation is immune.

## 3. Designated Safeguarding Personnel

### Designated Safeguarding Lead (DSL)

- Mr Ian Wills - iwills@shrubberyschool.co.uk

### Deputy Designated Safeguarding Leads

- Mrs Toni Rowley-Field – trowleyfield@shrubberyschool.co.uk
- Mr Jonathon Davis – jdavis@shrubberyschool.co.uk

## 4. Definitions

The terms "**children**" and "**child**" refer to anyone under the age of 18.

For the purposes of this policy, "**safeguarding and protecting the welfare of children**" is defined as:

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

For the purposes of this policy, "**consent**" is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, "**sexual violence**" refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, "**sexual harassment**" refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

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

- Sexual exploitation, coercion, and threats.

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

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

"**Deep fakes**" and "**deep nudes**" refer to digitally manipulated and AI-generated nudes and semi-nudes. For the purposes of this policy, "indecent imagery" is defined as an image which meets one or more of the following criteria:

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

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

For the purposes of this policy, "**abuse**" is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others - this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, "**physical abuse**" is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, "**emotional abuse**" is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

For the purposes of this policy, "**sexual abuse**" is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, "**neglect**" is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing, or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including using inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

For the purposes of this policy, "**child-on-child abuse**" is defined as abuse between children.

## 5. Legal Framework

This policy has due regard to all relevant legislation and statutory guidance, including but not limited to:

Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

### Statutory Guidance

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2023) 'Working Together to Safeguard Children 2023'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2025) 'Keeping children safe in education 2025'
- HM Government (2020) 'multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage'

### Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Working together to improve school attendance'
- DfE (2024) 'Meeting digital and technology standards in schools and colleges'

This policy operates in conjunction with the following school policies and documents:

- Children Missing from Education Policy
- Child Sexual Exploitation (CSE) Policy
- Prevent Duty Policy
- Child-on-child Abuse Policy
- Anti-bullying Policy
- Exclusion Policy
- Online Safety Policy
- Data Protection Policy
- Mobile Phone and Camera Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Social, Emotional and Mental Health (SEMH) Policy
- Behaviour Policy
- Low-level Safeguarding Concerns Policy
- Staff Disqualification Declaration Form

## 6. Roles and Responsibilities

### All Staff

All staff have a responsibility to:

- Act in the best interests of pupils
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Maintain a safe environment
- Identify pupils who may benefit from early help
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Know the identity of the DSL and Deputy DSLs
- Undertake safeguarding and online safety training
- Report concerns immediately to the DSL
- Maintain appropriate confidentiality
- Reassure pupils and avoid victim-blaming

Teachers, including the headteacher have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible. 7The Proprietor

The Proprietor and Proprietary Board take strategic responsibility for safeguarding and will:

- Receive regular safeguarding reports from the Designated Safeguarding Lead and provide appropriate challenge and support to ensure safeguarding arrangements are effective
- Ensure compliance with safeguarding legislation and statutory guidance
- Ensure safeguarding policies, procedures and training are effective
- Promote a whole-school safeguarding culture
- Oversee safer recruitment and suitability checks
- Ensure effective handling of allegations and whistleblowing
- Hold leadership to account for safeguarding effectiveness

The Headteacher has a duty to:

- Ensure that the policies and procedures, particularly concerning referrals of cases of suspected abuse, neglect and exploitation, are followed by staff.
- Provide staff with the appropriate policies and information upon induction. 7.5 The Designated Safeguarding Lead

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- Refer cases:
  - To CSCS where abuse, neglect and exploitation are suspected, and support staff who make referrals to CSCS.
  - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
  - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training and update this training at least every two years.



- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether referrals have been made.

The school ensures that there is always an appropriately trained DSL or Deputy DSL available during school hours and during out-of-hours or extracurricular activities.

## **7. Multi-Agency Working**

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

The school will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

The school will develop trusting relationships between families and agencies to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

The school will also be mindful of the importance of inter-agency working in identifying and preventing CSE. The school will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspectives to evaluate provision.
- Prioritising and sharing resources depending on pupils' needs.
- Celebrating inclusivity and diversity and challenging discrimination.
- Mutually and constructively challenging others assumptions in a respectful manner.

The school recognises the importance of proactive information sharing between professionals and local agencies to effectively meet pupils' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will be made aware that safeguarding partners may take legal action against them if they do not share specified information when a request is made for the purposes of safeguarding.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs. The school works in partnership with local safeguarding arrangements and other agencies. Information sharing is undertaken in line with data protection legislation, which does not prevent sharing information where failure to do so would place a child at risk.

## **8. Early Help**

is not improving or is worsening. Early help means acting on and referring early signs of abuse, neglect and radicalisation including support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. The school will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.

Any pupil may benefit from early help, but staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Are suffering from mental ill health.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from education, home or care.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised.
- Have family members in custody or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a PRU.

The school will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from early help, for example, if they are:

- Bereaved.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Have recently returned home to their family from care.
- Missing education, or are persistently absent from school, or not in receipt of full-time education.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation

## 9. Operation Encompass

Our school is part of Operation Encompass.

Operation Encompass is a national police and education early intervention safeguarding partnership which supports children who experience Domestic Abuse. Operation Encompass is in place in every police force in England and Wales, the Isle of Man, Jersey, Guernsey, Scotland, Northern Ireland and Gibraltar.

Children were recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act. Operation Encompass means that the police will share information with our school/college/nursery/setting about all police attended Domestic Abuse incidents which involve any of our children prior to the start of the next school day. The notification informs us about the context of the incident and includes the Voice of the Child.

Once a Key Adult (DSL) and their deputies have attended either an Operation Encompass briefing or have completed the free National Online Operation Encompass Key Adult training they will cascade the principles of Operation Encompass to all other staff. All staff are encouraged to undertake the online training.

Our parents are fully aware that we are an Operation Encompass school, and we ensure that when a new child joins our school the parents/carers are informed about Operation Encompass.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information.

The Key Adult has led training for all staff about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children.

## **10. Abuse, neglect and exploitation**

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school, inside and outside of the school, inside and outside of home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. Staff will understand that, in most cases, multiple issues will overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

## **11. Specific safeguarding issues**

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

**Appendix A** of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

## **12. Child-on-Child Abuse**

The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up".

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

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

The DSL will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g., where an adult poses as a child online to groom a child or young person.

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

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

### **13. Online safety and personal electronic devices**

The school will always adhere to the Online Safety Policy.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the school's Online Safety Policy. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the filtering and monitoring standards published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor internet use.

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Staff ICT and Electronic Devices Policy and Pupils' Personal Electronic Devices Policy.

Photographs and videos of pupils will be carefully planned before any activity with regard to consent and adhering to the school's Data Protection Policy and Photography and Images Policy.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

The effectiveness of filtering and monitoring systems, including any identified risks or incidents, is reviewed regularly by senior leadership and reported to the Proprietary Board as part of safeguarding oversight.

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g., a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

## **14. Consensual and non-consensual sharing of indecent images and videos**

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as "sexting" or youth-produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes apply to digitally manipulated and AI-generated imagery.

When a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. The DSL will work to support the affected pupils and inform them of the reporting routes to remove a nude or semi-nude that has been shared online or to prevent an image from being shared online.

The consensual and non-consensual sharing of indecent images and videos of those under the age of 18 with or by adults is a form of child sexual abuse and must be referred to the police.

## **15. Context of safeguarding incidents**

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

## **16. Pupils potentially at greater risk of harm**

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

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

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

**LAC and PLAC.** Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

**Pupils with SEND.** When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability.
- Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs.
- Communication barriers may exist, as well as difficulties in overcoming these barriers.

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration.

**LGBTQ+ pupils.** The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

## **17. Extracurricular activities and clubs**

External bodies that host extracurricular activities and clubs at the school will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

## **18. Concerns about pupils**

If a member of staff has any concern about a pupil's welfare, or a pupil has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSLs.

Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the Communication and confidentiality section of this policy.

Where the DSL is not available to discuss the concern, staff members will contact the deputy DSLs with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.

If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely in location.

If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always considered, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

## **19. Managing referrals**

All staff members, particularly the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

## **20. Concerns about school safeguarding practices**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and that such concerns will be taken seriously by the SLT.

Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with the school's Senior Leadership Team. Where a staff member feels unable to raise an issue with the school or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them such as the NSPCC whistleblowing helpline (0800 028 0285).

## **21. Safeguarding concerns and allegations of abuse against staff**

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the school's Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harm threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Low-level concerns will be handled in line with the schools' Low-level Safeguarding Concern Policy.

All low-level safeguarding concerns are recorded, reviewed, and monitored to identify patterns, themes, or potential risk.

## **22. Communication and confidentiality**

When recording, holding, using, and sharing information, the DSL will ensure that they:



- Understand the importance of information sharing, both within the school and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations, and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Can keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions.

Child protection records are retained securely in accordance with statutory guidance and local safeguarding arrangements.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

## **23. Safer recruitment**

The school's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be in 'regulated activity' if, because of their work, they:

- Are responsible daily for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly encounter children under 18 years of age.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

All schools providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school.

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

## **24. Single central record (SCR)**

The school keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

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

The following information is recorded on the SCR:

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

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

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supplies agencies have completed all relevant checks will also be included. The details of an individual will be removed from the SCR once they no longer work at the school.

## 25. Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated regularly and whenever there is a change in legislation.

The induction training will cover:

- The school's Safeguarding Policy
- The identity of the Designated Safeguarding Lead and Deputies
- A copy of Part 1 of the latest version of 'Keeping Children Safe in Education'
- An overview of the Prevent Duty, including its location in the Safeguarding Policy
- An overview of the Staff Code of Conduct
- An overview of the Children Missing Education Policy and its location in the Safeguarding Policy
- An overview of the Equality Policy and direction towards its location on the website
- Any other Health and Safety issues relevant to the position
- The school's Behaviour Policy

All staff receive appropriate safeguarding and child protection training that is regularly updated. In addition, staff receive safeguarding and child protection updates as required, to provide them with the relevant skills and knowledge to safeguard children effectively.

All staff are made aware of the DfE's advice about the use of force published on website:

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

## **26. Monitoring and review**

This policy is reviewed at least annually by the Designated Safeguarding Lead and the Headteacher and the Proprietary Board.

It is updated as required to reflect changes in legislation, statutory guidance, and emerging safeguarding risks.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

This policy has been reviewed as part of the school's integrated safeguarding framework to ensure consistency across all safeguarding-related policies.

## Appendix A – Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues. Here are the issues covered:

- Domestic abuse
- Children absent from education
- Child abduction and community safety incidents
- Child criminal exploitation (CCE)
- Cyber-crime
- Child sexual exploitation (CSE)
- Modern slavery
- FGM
- Virginity testing and hymenoplasty
- Forced marriage
- Radicalisation
- Pupils with family members in prison
- Pupils required to give evidence in court
- Serious violence
- Adult involvement in youth-produced sexual imagery

### Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “**domestic abuse**” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g., the person’s child) where both are aged 16 or over and are personally connected. “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

### Children absent from education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The school will ensure that the response to unexplained and/or persistent absence from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing from Education Policy.

The school will follow the DfE’s guidance on improving attendance where there is a need to work with children’s services due to school absences indicating safeguarding concerns.

### Child abduction and community safety incidents

For the purposes of this policy, “child abduction” is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g., people loitering nearby or unknown adults conversing with pupils. Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

## **Child criminal exploitation (CCE)**

For the purposes of this policy, “child criminal exploitation” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

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

Specific forms of CCE can include:

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

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

## **County lines**

For the purposes of this policy, “county lines” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK. As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Moving drugs.
- Handing over and collecting money for drugs.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

## **Cyber-crime**

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

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.

- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

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

## **Child sexual exploitation (CSE)**

For the purposes of this policy, "child sexual exploitation" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

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

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g., through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g., they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money, or new possessions.
- Suffering from changes in emotional wellbeing.
- Regularly becoming absent from school or education or not taking part.
- Displaying sexual behaviours beyond expected sexual development.

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

## **Modern slavery**

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

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

## **FGM**

For the purposes of this policy, "FGM" is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject. Indicators that a pupil may be at heightened risk of undergoing FGM include:

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

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.

FGM is included in the definition of so-called "'honour-based' abuse (HBA)", which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

## **Virginity testing and hymenoplasty**

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

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

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



## Forced marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to a country of origin.
- Being fearful about forthcoming school holidays.
- Showing signs of mental health disorders and behaviours, e.g., depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children's social care.

## Radicalisation

For the purposes of this policy, "**radicalisation**" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, "**extremism**" refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, "**terrorism**" refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide

information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

## **The Prevent Duty**

Under section 26 of the Counterterrorism and Security Act 2015, all schools are subject to a duty to have “**due regard to the need to prevent people from being drawn into terrorism**”, known as “**the Prevent duty**”. The Prevent duty will form part of the school's wider safeguarding obligations.

The school's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in the Prevent Duty Policy.

## **Pupils with family members in prison**

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of

‘Are you a young person with a family member in prison?’ from Action for Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

## **Pupils required to give evidence in court**

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils will be provided with the booklet ‘**Going to Court**’ from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

## **Mental health**

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the school's Social, Emotional and Mental Health (SEMH) Policy will be always consulted and adhered to.

## **Serious violence**

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

- Increased absence from school.
- A significant decline in academic performance.
- A significant change in wellbeing.
- Unexplained injuries.

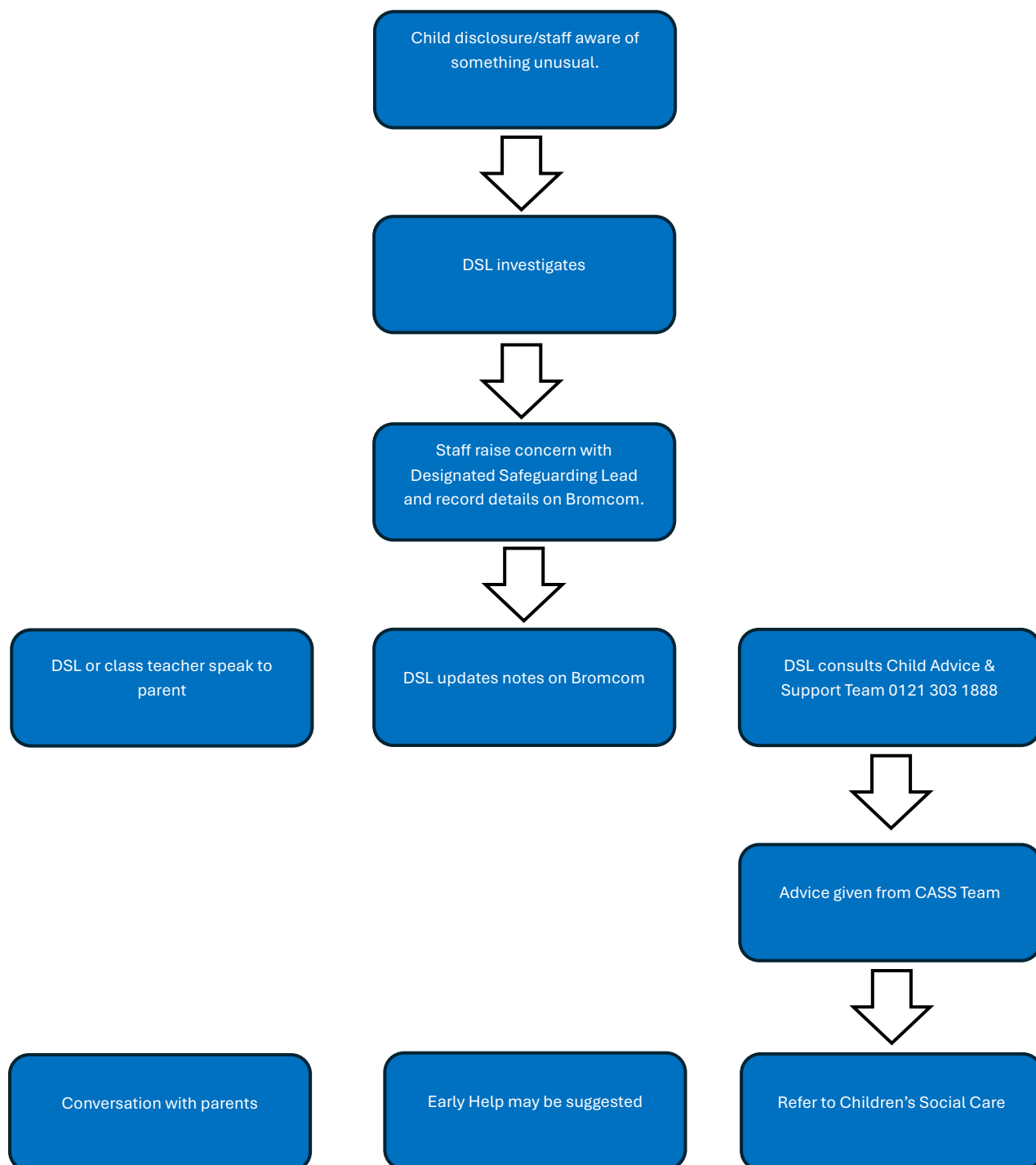
Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

The school will cooperate with core duty holders when asked and ensure arrangements are in place to do so.

### **Adult involvement in youth-produced sexual imagery**

The consensual and non-consensual sharing of indecent images and videos of those under the age of 18 with or by adults is a form of child sexual abuse and must be referred to the police.

## Appendix B – Safeguarding timeline



## Appendix C - Key external contacts

If the concern is regarding a child, it is where the child lives that determines who to contact:

### Birmingham

#### Birmingham Children's Trust - Advice and Support

The first point of contact is the Birmingham Children's Trust Contact Centre. Tel 0121 303 1888 Monday to Thursday 8.45am to 5.15pm, Friday 8.45am to 4.15pm

Emergency Duty Team (all other hours) 0121 675 4806

Email [cass@birminghamchildrenstrust.co.uk](mailto:cass@birminghamchildrenstrust.co.uk)

More information is on their website [www.birminghamchildrenstrust.co.uk](http://www.birminghamchildrenstrust.co.uk)

#### MASH - Birmingham Safeguarding Children Partnership Advice and Support Service

(CASS) Tel: 0121 303 1888 or via secure email [cass@birminghamchildrenstrust.co.uk](mailto:cass@birminghamchildrenstrust.co.uk)

Outside normal hours please call the Emergency Duty Team on 0121 675 4806

**Local Authority Designated Officers (LADO)** The LADO service has produced a toolkit that you can access via [www.iscpbirmingham.org.uk/lado](http://www.iscpbirmingham.org.uk/lado).

The LADO Team can be contacted on 0121 675 1669 or via email: [ladoteam@birminghamchildrenstrust.co.uk](mailto:ladoteam@birminghamchildrenstrust.co.uk)

#### PREVENT Service

For information see [www.policeandschools.org.uk/resources/prevent.html](http://www.policeandschools.org.uk/resources/prevent.html)

PREVENT Lead Birmingham is Waqar Ahmed email [waqar.ahmed@birmingham.gov.uk](mailto:waqar.ahmed@birmingham.gov.uk) Any concerns regarding radicalisation should be referred to West Midlands Police via [CTU\\_Gateway@west-midlands.pnn.police.uk](mailto:CTU_Gateway@west-midlands.pnn.police.uk) in addition to this concerns around persons under 18 years old should also be referred to Birmingham MASH

### Staffordshire including Lichfield

The first point of contact is Staffordshire County Council's First Response Service. Tel 0300 111 8007 Monday to Thursday 8.30am to 5.00pm, Friday 8.30am to 4.30pm

Emergency Duty Team (all other hours) 0345 604 2886 or Mobile 07815 492613.

More information is on their website [www.staffsscb.org.uk](http://www.staffsscb.org.uk)

### Solihull

The first point of contact is Solihull Safeguarding Children and Young People. Tel 0121 788 4300 Monday to Thursday 8.45am to 5.20pm, Fri 8.45am to 4.30pm

Emergency Duty Team (all other hours) 0121 605 6060

More information is on their website [www.solihull.gov.uk/children-and-familysupport/safeguarding-children-young-people](http://www.solihull.gov.uk/children-and-familysupport/safeguarding-children-young-people)

### Walsall

The first point of contact is Walsall Family Information Service. Tel 0300 555 2866 option 2, Monday to Thursday 8.45am to 5.15pm, Friday 8.45am to 4.45pm

Emergency Response Team (all other hours) 0300 555 2922 or 03000 555 2836

More information is on their website [www.mywalsall.org/fis/safeguarding-in-walsall](http://www.mywalsall.org/fis/safeguarding-in-walsall)

## **Warwickshire**

The first point of contact is Warwickshire Children and Families Front Door. Tel 01926 414144 option 3 Monday to Thursday 8.30am to 5.30pm, Friday 8.30am to 5.00pm

Emergency Duty Team (all other hours) 01926 886922

More information is on their website [www.safeguardingwarwickshire.co.uk/safeguardingchildren](http://www.safeguardingwarwickshire.co.uk/safeguardingchildren)

## **Police**

If a crime has been committed or a child is in immediate danger call 999

## **Childline**

Tel 0800 1111

[www.childline.org.uk](http://www.childline.org.uk)

## **NSPCC**

Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) Tel: 0800 028 0285

[www.nspcc.org.uk/what-you-can-do/report-abuse](http://www.nspcc.org.uk/what-you-can-do/report-abuse)

## **Prevent Duty**

The Department for Education has set up a telephone helpline 020 7340 7264 Monday to Friday 9am to 5pm to enable people to raise concerns directly.

More information is on their website [www.educateagainsthate.com/what-should-i-do-if-i-have-a-concern-about-a-child](http://www.educateagainsthate.com/what-should-i-do-if-i-have-a-concern-about-a-child)