



# **SAFEGUARDING POLICY**

| Document control table |                                                         |                   |
|------------------------|---------------------------------------------------------|-------------------|
| Document title:        | Safeguarding Policy                                     |                   |
| Owner (name & job):    | Natalie Parker, Trust Strategic Lead for Safeguarding   |                   |
| Version number:        | V18                                                     |                   |
| Date approved:         | 2 September 2026                                        |                   |
| Approved by:           | OGAT Board                                              |                   |
| Date of next review:   | In line with Keeping Children Safe in Education updates |                   |
| Document History       |                                                         |                   |
| Version Date           | Author                                                  | Note of revisions |

## **CONTENTS**

|                                                              |          |
|--------------------------------------------------------------|----------|
| <b>NAMED PERSONS WITH RESPONSIBILITY FOR SAFEGUARDING</b>    | <b>5</b> |
| <b>1. INTRODUCTION</b>                                       | <b>5</b> |
| <b>2. OUTWOOD GRANGE ACADEMIES TRUST COMMITMENT</b>          | <b>7</b> |
| <b>3. PROVIDING A SAFE AND SUPPORTIVE ENVIRONMENT</b>        | <b>7</b> |
| 3.1 Safer Recruitment and Selection                          | 7        |
| 3.2 Safe Practice                                            | 8        |
| 3.3 Sharing Safeguarding Information with Students           | 8        |
| 3.4 Partnership with parents / carers                        | 9        |
| 3.5 Partnerships with Others                                 | 9        |
| 3.6 Academy Training and Staff Induction                     | 9        |
| 3.7 Support, Advice and Guidance for Staff                   | 10       |
| 3.8 Online Safety including AI-Generated Harms and Deepfakes | 10       |
| 3.9 Filtering and Monitoring                                 | 11       |
| 3.10 Single Sex Sport                                        | 11       |
| 3.11 Related Trust Policies                                  | 12       |
| 3.12 Regulations and safeguarding                            |          |

requirements relating to Academy premises 12 3.13 Roles and Responsibilities 13

#### **4. IDENTIFYING CHILDREN AND YOUNG PEOPLE WHO MAY BE SUFFERING SIGNIFICANT HARM 15**

4.1 Children Who Are Questioning Their Gender 16 4.2 Children living in stealth 16 4.3 Children who are lesbian, gay or bisexual 17 4.4 Children with SEND 17 4.4 Child Sexual Exploitation (CSE) and Trafficking 17 4.5 Abuse, Neglect and Exploitation - Definitions 18

#### **5. TAKING ACTION TO ENSURE THAT CHILDREN AND YOUNG PEOPLE ARE SAFE AT THEIR ACADEMY AND AT HOME 20**

5.1 Staff will Immediately Report: 20 5.2 Responding to Disclosure 21 5.3 Action by the Designated Safeguarding Lead or Deputy Safeguarding Lead 22 5.4 Action following a child protection and safeguarding referral 22 5.5 Recording and Monitoring 23 5.6 Supporting the Child and Partnership with Parents/Carers 24 5.7 Allegations regarding Person(s) working in or on behalf of the Trust (including volunteers) 24

5.8 Children Potentially at Greater Risk of Harm 27 5.8.1 Looked After Children and Previously Looked After Children (including those in Kinship Care) 28 5.8.2 Children who Need a Social Worker (those on a Child in Need Plan or a Child Protection Plan) 28 3 | Page

5.8.3 Mental Health 28 5.8.4 Care Leavers 28 5.9 Work Experience 29

5.10 Serious Violence, Harmful Sexual Behaviour and Child on Child Abuse (including harassment and violence) 29 5.10.1 Harmful Sexual Behaviour (HSB) 29 5.10.2 Management of incidents of Serious Violence, Harmful Sexual Behaviour and/or Child on Child abuse 30 5.10.3 Risk and needs assessment 31 5.11 Physical Intervention and Use of Reasonable Force 32 5.12 Alternative Provision 33 5.13 Private Fostering 33 5.14 Domestic Abuse 33 5.15 Elective Home Education 33 5.16 Children Absent from Education 34 5.17 Children and the Court System 35

Appendix A: Safeguarding Incident Recording Sheet 35 Appendix B: Further detail on Child Criminal and/or Sexual Exploitation (CSE) 37 Appendix C: Additional information on 'So-called Honour' Based Abuse 40

## **NAMED PERSONS WITH RESPONSIBILITY FOR SAFEGUARDING**

During term time the Designated Safeguarding Lead, or a nominated Deputy, will always be available (during school hours) to discuss any safeguarding concerns.

Adequate and appropriate safeguarding arrangements for out of hours/out of term activities, such as trips or visits, will be made.

If in exceptional circumstances, the Designated Safeguarding Lead (or a Deputy) is not available, this should not delay appropriate action being taken. Staff should speak to a member of the Senior Leadership Team and/or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the Designated Safeguarding Lead (or a Deputy) as soon as is practically possible.

The Academy has a confidential, shared safeguarding email inbox which is monitored by safeguarding staff during the school day. This is [safeguarding@belllane.outwood.com](mailto:safeguarding@belllane.outwood.com)

**Designated Safeguarding Lead (DSL): Rebecca Pattison**  
**[enquiries@belllane.outwood.com](mailto:enquiries@belllane.outwood.com) 01977613304**

**Deputy Designated Safeguarding Lead (DDSL): Kim Taylor and Gemma Barr**  
**[enquiries@belllane.outwood.com](mailto:enquiries@belllane.outwood.com) 01977613304**

**The Safeguarding Governor is:** Charlotte Fletcher

A Local Authority Designated Officer (LADO) provides advice and coordinates multi-agency actions (with police or social care) whenever an allegation or concern is raised that an adult working or volunteering with children has harmed a child, committed an offence, or shown unsuitability for their position of trust.

**Local Authority Designated Officer (LADO):** Lado.Referrals@wakefield.gov.uk

## **I. INTRODUCTION**

This policy is in response to:

- 1) Sections 157 and 175 of the Education Act 2002, implemented June 2004
- 2) 'Keeping Children Safe in Education' issued by the DfE in 2026

It is in line with the relevant Safeguarding Partnership's Child Protection and Safeguarding Procedures and DfE guidance. 'Children' includes everyone under the age of 18. The Children Act 1989 states a child is defined as anyone who has not yet reached their 18<sup>th</sup> birthday. Where a student turns 18, they legally become an adult. If we have safeguarding concerns about a student who is over 18 we define them as a vulnerable adult. When a student turns 18, their legal protection falls under the Care Act 2014, which sets out the legal framework for protecting adults at risk.

**This policy applies to all adults, including supply staff and volunteers, working in or on behalf of the Academy or the Trust.**

5 | Page

**Safeguarding children is defined as:**

- The actions we take to promote the welfare of children and young people and protect them from harm are everyone's responsibility. Everyone who comes into contact with children, young people and families has a role to play.

**Safeguarding and promoting the welfare of children is defined as:**

- Protecting children from maltreatment.
- Preventing impairment of children's mental or 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.

(Guided by the principles of Working Together to Safeguard Children

2026). **Safeguarding for adults is defined as:**

- Applying safeguarding duties to those over 18 who have care and support needs and/or are experiencing or is at risk of abuse or neglect and/or is unable to protect themselves from abuse or neglect because of those care and support needs.

- Identifying those who are, or may become, vulnerable.

**Safeguarding is not just about protecting children and young people from deliberate harm. It also relates to aspects of Academy life including:**

- Health and Safety.
- The use of reasonable force.
- Meeting the needs of those with medical conditions.
- Providing first aid.
- Educational visits.
- Intimate care.
- Internet or online safety.
- Appropriate arrangements to ensure Academy security, taking into account the local context.

Everyone in the education service shares an objective to help keep children and young people safe by:

- Maintaining an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. If staff have any concerns about a child's welfare, they should act on them immediately and considering at all times what is in the best interests of the child.
- Providing a safe environment for children and young people to learn in education settings. ● Identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both at home and in the education setting.
- Safeguarding and promoting the welfare of children is everyone's responsibility. ● contributing to an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities.

6 | Page

## **Victims and alleged perpetrator(s)**

For the purposes of this policy, we use the term 'victim'. It is a widely recognised and understood term. We recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Staff will be conscious of this when managing any incident and be prepared to use any term with which the child is most comfortable.

## **2. OUTWOOD GRANGE ACADEMIES TRUST COMMITMENT**

The Trust is committed to safeguarding and promoting the welfare of all its students. Each student's welfare is of paramount importance. We recognise that some children may be especially vulnerable to abuse e.g. those with Special Educational Needs, those living in adverse circumstances. We recognise that children who are abused or neglected may find it difficult to develop a sense of self worth and to view the world in a positive way. We recognise that children who have been abused may not always be ready to share this information, and will provide a trusted and safe space when they are ready. Whilst at the Academies, their behaviour may be challenging. We recognise that some children who have experienced abuse may harm others. We will always take a considered and sensitive approach in order that we can support all our students.

### **3. PROVIDING A SAFE AND SUPPORTIVE ENVIRONMENT 3.1**

#### **Safer Recruitment and Selection**

The Trust pays full regard to DfE guidance 'Keeping Children Safe in Education' 2026. We ensure that all appropriate measures are applied in relation to everyone who works in a Trust Academy who is likely to be perceived by the students as a safe and trustworthy adult, including volunteers and staff employed by contractors. Safer recruitment practice has been fully encompassed in the Trust's Recruitment Policy and its procedures.

Recruitment practices in place are:

- **Pre-Employment Checks:** All new employees, including volunteers, governors, and trustees, undergo a series of mandatory checks before starting work. These include identity verification, right-to-work status, health assessments, and criminal conviction disclosures. An Enhanced DBS check which includes a Section 128 check with a Barred List check is a core requirement for all staff.
- **References and Employment History:** We require two professional references for all appointments. These must include a candidate's last employer and, if applicable, their most recent role working with children.
- **Qualifications and Teacher Status:** For all relevant staff, we verify professional qualifications and conduct Teacher Services checks, including Qualified Teacher Status (QTS) verification. We do not accept a CV unless it is submitted with a fully completed application form.
- **Overseas and External Staff:** Individuals who have lived or worked outside the UK for three months or more in the last ten years must also provide overseas police and professional body checks. We ensure that any contracted or supply staff have undergone the same level of stringent checks.
- **Ongoing Monitoring and Records:** Each Academy maintains a Single Central Record (SCR) to detail all checks carried out on staff, volunteers, governors, and regular visitors. We make appropriate referrals to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency when a teacher or staff member in regulated activity is

7 | Page

dismissed. We also inform all shortlisted candidates that we will conduct a search of their online presence as part of our pre-recruitment checks.

- At least one member of every interview or appointment panel has successfully completed Safer Recruitment training.

Further details of the checks undertaken are outlined in the Trust's Recruitment and Selection Procedure Policy.

#### **3.2 Safe Practice**

All staff undertake annual Safeguarding Training, in addition other staff and those with designated safeguarding responsibilities undertake additional safeguarding training suitable for their role.

The Trust's Staff Code of Conduct outlines acceptable and unacceptable behaviour towards children and young people.



Safe working practice ensures that students are safe and that all staff:

- Are responsible for their own actions and behaviours and know how to avoid any conduct which could lead any reasonable person to question their motivation or intentions. ● Work in an open and transparent way.
- Discuss and/or take advice from the Academy management over any incident which may give rise to concern.
- Record any incidents or decisions made in relation to a child or young person. ● Apply the same professional standards regardless of gender or sexuality. ● Are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

### **3.3 Sharing Safeguarding Information with Students**

The Trust is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All students know that we have a senior member of staff with responsibility for child protection and safeguarding and know who this is. We inform students of whom they might talk to, both in and out of the Academy, their right to be listened to and heard and what steps can be taken to protect them from harm. Personal Development and Growth lesson materials are used to help students learn how to keep safe.

Information is made available to students, including NSPCC and Childline.

The Trust's arrangements for consulting with and listening to students include tutor time, peer support and mentoring schemes, teaching and associate staff, and student voice. In primary settings, pupils are warmly encouraged to speak with a teacher or staff member at any point during the school day, alongside having dedicated 'Time to...' sessions. We make students aware of these arrangements via tutor time, assemblies, posters, letters, lessons, and age-appropriate classroom discussions.

### **3.4 Partnership with parents / carers**

We are committed to working positively, open and honestly with parents/carers. We ensure that all parents/carers are treated with respect, dignity and courtesy. We respect parents/carers' rights

8 | Page

to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so to protect others. Each Academy will share with parents/carers any concerns we may have about their child unless doing so may place the child at risk of harm.

Outwood Grange Academies Trust follow each Safeguarding Partnership's (formerly LSCB) procedures when dealing with any matters of a child protection and safeguarding nature. The Academy will endeavour to discuss all concerns with parents/carers about their child/ren. However, there may be exceptional circumstances when an Academy will discuss concerns with social care and/or the police without parental knowledge (in accordance with Safeguarding Partnership's Child Protection and Safeguarding Procedures. The Academy will, of course, always aim to maintain a positive relationship with all parents/carers.

### **3.5 Partnerships with Others**

No single professional can have a full picture of a child or young person's needs and circumstances. If children, young people and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Although inter agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual and/or criminal exploitation.

The Trust recognises that it is essential to establish positive and effective working relationships with other agencies. These include the local authority, social care, Barnardo's, police and health.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children and young people safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children and young people.

Records of information sharing will include:

- a clear and comprehensive summary of the concern/s.
- details of how the concern was followed up and resolved.
- a note of any action taken, decisions reached and the outcome.

### **3.6 Academy Training and Staff Induction**

Each Academy's Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead/s (DDSL) with responsibility for child protection and safeguarding undertake advanced child protection and safeguarding training on a 2 yearly basis.

Each Academy Principal and all other staff, including associate staff, undertake appropriate induction training to equip them to carry out their responsibilities for child protection and safeguarding effectively. Staff are required to annually complete online child safeguarding training which reflects the updated KCSIE and includes elements of online safety.

All staff (including temporary staff and volunteers) are made aware, prior to appointment of the Trusts responsibilities with regards to safeguarding and as part of onboarding are asked to read KCSIE Part One in full. Once appointed all staff are provided with an induction which includes discussion and signposting to relevant safeguarding policies.

## **9 | Page**

Trustees and Governors (Academy Councils) will receive an appropriate level of training to provide them with the necessary knowledge to ensure safeguarding policies and procedures are effective. This may be delivered face to face or online.

### **3.7 Support, Advice and Guidance for Staff**

Staff will be supported by the DSL and DDSL with responsibility for child protection and safeguarding, who will provide guidance and training where appropriate. They will be supported by the Academy Principal and through the Trust.

Advice and support is always available from the local authority and /or from the police where required.

### **3.8 Online Safety including AI-Generated Harms and Deepfakes**

It is essential that children and young people are safeguarded from potentially harmful and inappropriate online material. The Trust is compliant with the Filtering and Monitoring Standards for schools and colleges, has website filtering and monitoring software on computers and devices available in its Academies. Our Academies have a strict no-mobile phone policy to support the safeguarding of children and young people.

As part of a broad and balanced curriculum, the Trust offers a curriculum which covers the need for safeguarding, including online via the Personal Development and Growth curriculum, tutor time and the assembly programmes.

Systems are in place to ensure that the online content that children and young people can access via Academy systems is carefully filtered and monitored to ensure that they do not have access to concerning content. The effectiveness of these systems will be reviewed by the Trust's IT team at least once a year.

We recognise that the rapid development of generative Artificial Intelligence (AI) presents distinct, modern risks in relation to safeguarding. This can include the creation, download, or distribution of deepfakes and AI-generated or digitally manipulated nude or semi-nude imagery, including that of children.

Staff must treat any report or disclosure involving AI-manipulated sexual imagery with the same urgency as a traditional safeguarding incident. The Academy will apply a robust safeguarding response to all such incidents, regardless of whether the imagery is shared consensually or non-consensually. The DSL, or Deputy, will ensure a response that provides immediate pastoral safety measures for the victim while initiating targeted, supportive, or disciplinary intervention for the alleged perpetrator. Every assessment will factor in the child's age, developmental stage, vulnerabilities, and any underlying indicators of coercion or exploitation.

### **3.9 Filtering and Monitoring**

The Trust operates a multi layer filtering system for monitoring student computer activity. The system consists of two website filtering systems based on categories and a keyword detection system. These systems apply to all student devices used within the Academy and any Academy issued devices the student may take home for remote learning. The access levels permitted differ between in Academy and at home.

#### **10 | Page**

Filtering logs are stored onsite in each Academy and can be retrieved and reviewed by the Network Manager or Assistant Network Manager. Keyword detection reviewing will be made available to DSLs in each Academy.

Staff must report any concerns about websites or internet use that they identify in the Academy to the DSL and Network Manager as soon as possible to ensure that these concerns are investigated and web monitoring and filtering software can be updated to protect children.

Staff will receive training to understand and identify the potential benefits and risks of generative AI. A safeguarding annual review will be undertaken in relation to online safety, filtering and monitoring.

## Prevent Duty and Radicalisation

Children and young people can be vulnerable to extremist ideology and radicalisation.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The use of social media and the internet as tools to radicalise young people cannot be underestimated. We recognise that those that seek to recruit young people to follow extremist ideology often target those who are already vulnerable in some way and that exposure to extreme views can make young people vulnerable to further manipulation and exploitation.

As a Trust we are clear that we have a duty to safeguard young people and educate on the risks and we do this via our Relationships Education (primary) and Relationships and Sex Education (secondary) curriculum, Personal Development and Growth curriculum and assembly programme.

### 3.10 Single Sex Sport

The Equality Act 2010 contains an exception in relation to single sex sport. It applies to participation in any sport or game, or activity of a competitive nature, where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). This means that schools can separate children according to their biological sex in these circumstances without discriminating unlawfully against them on the basis of their sex. Some sports may need to be played in single-sex groups from a certain age to ensure children's safety, and where this is the case there must be no exceptions. In other cases, this may be in relation to fairness. Where there are no safety concerns and a child makes a request relating to how they participate, we will consider the request in light of the advice on "considering requests for support with social transition" in Keeping Children Safe in Education 2026. This means we will take into account all relevant factors, including whether supporting social transition

#### 11 | Page

is overall in the best interests of the child, as well as considering the impact on other children and the aim of creating safe and fair environments for children to participate in PE.

### 3.11 Related Trust Policies

Safeguarding encompasses issues such as student health and safety and bullying and a range of other issues, including arrangements for meeting the medical needs of children, providing first aid, Academy security, drugs and substance misuse etc. There may also be other safeguarding issues that are specific to the local area of population.

Other related Trust Policies and protocols that should be referred to include:

- Allergy Policy
- Alternative Provision Policy
- Anti-Bullying Policy
- E-Safety Policy
- Equality and Diversity Policy
- Health and Safety Policy
- Lettings Policy
- Mental Health Strategy
- Positive Discipline for Learning and Life Policies
- Recruitment and Selection Process and Procedure
- Safer Working Practices
- Schools Visits Guidance
- SEND Policy
- Staff Code of Conduct
- Substance Misuse and Education Policy
- Supporting Pupils with Medical Conditions Policy
- Teenage Pregnancy Policy
- Use of Reasonable Force Policy
- Whistleblowing Procedure
- Work Placement Policy

### **3.12 Regulations and safeguarding requirements relating to Academy premises**

#### **Letting and/or use of Academy Premises**

The Trust has procedures and processes in place to seek assurance that any other body using the Academy premises has appropriate safeguarding and child protection policies and procedures in place (and will inspect these as needed) and to ensure that there are arrangements in place to liaise directly with the Academy on these matters where appropriate.

#### **Toilets, Changing Rooms and Showers**

We will not allow children to use facilities designated for the opposite biological sex. This includes where we are responding to a request to support any degree of social transition for children who are questioning their gender. We will not allow a child, aged 11 years or older at the start of the school year, to undress in front of a child of the opposite biological sex. This is required by the School Premises (England) Regulations 2012 which requires maintained schools and academies to

12 | Page

provide suitable changing accommodation and showers for pupils who are aged 11 years or over at the start of the school year.

If a child who is questioning their gender does not want to use the facilities designated for their biological sex, we will consider whether we can provide an alternative, for example self-contained individual facilities, without compromising the provision of single-sex facilities. Any alternative arrangements should not compromise the safety, comfort, privacy or dignity of the child, or of any

other children. We will review any arrangements made regularly.

### **3.13 Roles and Responsibilities**

#### **The Trust will ensure that:**

- The Trust has a Safeguarding Policy and procedures in place that are in accordance with the Safeguarding Partnership guidance and locally agreed interagency procedures, national guidance.
- This policy is available to parents/carers.
- The Trust operates safer recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children.
- The Trust has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures.
- A member of the Academy's Senior Leadership Team is designated to take lead responsibility for child protection and safeguarding (and a deputy).
- Staff undertake appropriate child protection and safeguarding training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) as well as including at least annual updates via Learning and Performance.
- They remedy, without delay, any deficiencies or weaknesses regarding child protection and safeguarding arrangements.
- Where services or activities are provided on an Academy's premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding and child protection and liaises with the Academy on these matters where appropriate.
- The Safeguarding Policy is updated and reviewed annually.
- Appropriate online filtering and monitoring is in place and is kept up to date, whilst not preventing access to online learning opportunities.
- Should an allegation arise outside of the Academy's term time and the DSL, DDSL and Principal are unavailable, the Trust has appointed relevant staff to be responsible for managing the referral process in their absence.
- That Trustees and Governors receive appropriate training to provide oversight and monitoring of the above.

#### **Each Academy Principal will ensure that:**

- The policies and procedures adopted by the Trust are fully implemented, and followed by all staff.
- Sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities.

#### **13 | Page**

- Appropriate levels of qualified staff are maintained within the Academy to ensure adequate DSL/DDSL cover arrangements during school hours and any out of hours/out of term activities including trips and visits.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to safeguarding and such concerns are addressed sensitively and effectively in a timely manner

in accordance with the agreed Whistleblowing Policy.

### **Each Designated Safeguarding Lead and Deputy Designated Safeguarding Lead will:**

- Take the lead responsibility for child protection and safeguarding (including online safety and understanding the filtering and monitoring systems and processes in place).
- Be given the time, funding, training, resources and support to carry out the role effectively.
- Be available to discuss any concerns during school hours and ensure adequate cover arrangements.
- Ensure adequate arrangements are made for out of hours/term time activities eg trips and visits.
- Ensure all staff are aware of the process for community-based Family Help assessments, including when a case should be referred to Family Help support and services provided at Targeted Early Help level (under sections 10 and 11 of the Children Act 2004), and statutory services. Note: Terminology for services may vary according to each local authority.

### **Referrals**

- Refer cases of suspected or alleged abuse to the relevant investigating agencies.
- Act as a source of support, advice and expertise within the Academy.
- Liaise with the Academy Principal to inform them of any issues and ongoing investigations.

### **Training**

- Recognise how to identify signs of abuse and know when it is appropriate to make a referral.
- Have a working knowledge of how child protection and safeguarding cases operate, the conduct of a child protection and safeguarding case conference and be able to attend and contribute to these and any other multi agency arrangements.
- Ensure that all staff have access to, and understand, the Safeguarding Policy.
- Ensure that all staff have induction training in respect of safeguarding.
- Circulate relevant information and guidance to staff on a regular basis in respect of safeguarding.
- Keep detailed, accurate and secure written records.
- Are able to understand the unique risks associated with online safety.
- Recognise the additional risks that children and young people with Special Educational Needs and Disabilities (SEND) face online and are confident they have the capability to support children with SEND.
- Obtain access to resources and attend any relevant or refresher training courses at least every two years.

### **Raising Awareness**

- Ensure parents/carers are made aware of the Safeguarding Policy which alerts them to the fact that referrals may be made with or without their consent.
- Ensure that appropriate staff have the information they need in relation to a child's Looked

After or Care Leaver legal status and contact arrangements with birth parents or those with parental responsibility where applicable. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after them. The DSL will have details of the child's social worker and the name of the Virtual Head in the authority that looks after the child.

- Help promote education outcomes, sharing the information about the welfare, child protection and safeguarding issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and Academy leadership staff.
- When a child leaves the Academy, ensure the safeguarding file is transferred to the new establishment within the timescales detailed in relevant guidance and is transferred separately from the main student file. If a child goes missing or leaves to be educated at home, then the local authority will be notified and advice requested about transferring the file.

### **All staff and volunteers will:**

- Act immediately if they have any concerns about a child's welfare.
  - Reassure victims that they are being taken seriously and that they will be supported and kept safe.
  - Be aware that children 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. This should not prevent staff from having a professional curiosity and speaking to the Designated Safeguarding Lead (or a Deputy) if they have concerns about a child.
  - Be aware of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those referred to in this policy)
  - Not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital.
  - Fully comply with the Trust's policies and procedures.
  - Attend appropriate safeguarding training.
  - Inform the Designated Safeguarding Lead, or Deputy, of any concerns, **without delay**.
- Understand the process for making referrals to children's social care and record safeguarding incidents appropriately.

## **4. IDENTIFYING CHILDREN AND YOUNG PEOPLE WHO MAY BE SUFFERING SIGNIFICANT HARM**

The Trust is committed to a vigilant and proactive approach to identifying children and young people who may be at risk. All staff are required to be familiar with the various forms of abuse and harm that children and young people may experience, as detailed in this policy and in relevant training. Staff should also be aware of the indicators that may suggest a child or young person is suffering from harm.

The following is a non-exhaustive list of safeguarding issues that staff should be aware of:

- Bullying, including online bullying

15 | Page

- Substance misuse
- Extremist behaviour (i.e. radicalisation)
- Serious Violence, Harmful Sexual Behaviour and/or Child-on-child abuse (including



harassment and violence)

- Domestic abuse
- Emotional abuse
- Forced marriage
- Female Genital Mutilation (FGM)
- 'So called' Honour Based Abuse
- Online abuse and exploitation
- Neglect
- Physical abuse
- Sexual abuse
- Child sexual exploitation and trafficking
- Child criminal exploitation and modern slavery
- Verbal abuse

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding where appropriate.

#### **4.1 Children Who Are Questioning Their Gender**

Children questioning their gender may experience bullying, distress, social isolation or other safeguarding concerns. Staff will respond sensitively, consider the individual circumstances and act in their best interests. Requests for support with social transition will be considered in accordance with Keeping Children Safe in Education 2026, applicable legislation and our relevant procedures.

##### **Decisions will:**

- consider the child's age, needs, wishes, feelings and circumstances
- involve parents or carers unless there is a safeguarding reason not to do so
- involve the DSL where safeguarding considerations arise
- consider relevant professional advice
- be recorded accurately and shared only where necessary
- be reviewed when needs or circumstances change

We will challenge bullying, harassment and discrimination and provide appropriate support to any child who wishes to reconsider or reverse an earlier request.

#### **4.2 Children living in stealth**

All staff should be particularly conscious of the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth (that is, others may be unaware of their biological sex).

#### **4.3 Children who are lesbian, gay or bisexual**

who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

#### **4.4 Children with SEND**

Additional barriers can sometimes exist when recognising abuse for children with SEND. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and
- communication barriers and difficulties overcoming these barriers.
- Therefore any reports of abuse involving children with SEND will involve liaison with the Designated Safeguarding Lead (or Deputy) and the SENDCO

#### **4.4 Child Sexual Exploitation (CSE) and Trafficking**

The Trust recognises that Child Sexual Exploitation (CSE) is a form of child abuse and that the Trust has a responsibility to protect children from this harm. This includes a particular focus on the risks associated with "county lines," a form of criminal exploitation where children are used to transport drugs and money.

The Trust will:

- Work in partnership with inter-agency partners to safeguard children and young people from all forms of sexual exploitation and trafficking.
- Raise awareness of CSE with staff through regular training and updates.
- Ensure that the curriculum includes lessons on age-appropriate online safety, healthy relationships, and the risks of exploitation, as part of Personal, Social, Health and Economic (PSHE) and Relationships and Sex Education (RSE).
- Follow the procedures for reporting concerns as set out in this policy if a child or young person is suspected to be at risk of, or involved in, CSE or trafficking.

Staff are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, students, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or Trust staff being alerted to concerns.

**Safeguarding can involve a range of potential issues such as:**

- Bullying, including online bullying, prejudice based bullying and faith targeted abuse
- Serious Violence, Harmful Sexual Behaviour and/or Child on child abuse.
- Racist, homophobic or transphobic abuse.
- Extremist behaviour i.e. radicalisation.
- Child sexual exploitation.
- Child criminal exploitation.
- Sharing of nude and semi-nude images (sexting).
- Substance misuse.

- Disinformation, misinformation and conspiracy theories.
- Upskirting (typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm).
- Issues which may be specific to a local area or population, for example gang activity and serious youth violence. Staff will need to recognise possible signs of a child being at risk of or involved in youth violence, such as lack of guilt and empathy, physical violence/aggression, positive attitude towards delinquency, previous criminal activity, unexplained money or new expensive possessions, unexplained physical injuries and regular truancy.
- Particular issues affecting children include domestic abuse, female genital mutilation, honour based abuse, breast ironing and forced marriage.

#### 4.5 Abuse, Neglect and Exploitation - Definitions

The Children Act 1989 states a child is defined as anyone who has not yet reached their 18<sup>th</sup> birthday. Where a student turns 18 they legally become an adult. If we have safeguarding concerns about a student who is over 18 we define them as a vulnerable adult.

**Harm** means ill treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; development means physical, intellectual, emotional, social or behavioural development; health includes physical and mental health; ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

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

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

**Sexual** abuse involves forcing enticing or inciting a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at or in the production of pornographic material or watching sexual activities or encouraging children or young people to behave in sexually inappropriate ways.

**Emotional** abuse is the persistent emotional maltreatment such as to cause severe and persistent adverse effects on emotional development. It may involve conveying to children and young people that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed.

These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing fear, danger or exploitation. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

**Neglect** is the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of 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.

Staff must also be aware of other forms of harm including forced marriage, radicalisation, honour based abuse and female genital mutilation.

Family Help / Targeted Early Help means providing support as soon as a problem emerges at any point in a child's life, in the first instance staff should discuss Family Help or Early Help requirements with the DSL. Staff may be required to support other agencies and professionals in a Family Help assessment. Staff should be particularly alert to the potential need for Family Help for a child who:

- is disabled or has certain health conditions and has specific additional needs.
- has special educational needs (whether or not they have a statutory Education, Health and Care plan).
- has a mental health need.
- is a young carer.
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- is frequently missing/goes missing from care or home.
- is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- is at risk of being radicalised or exploited.
- has a family member in prison, or is affected by parental offending.
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health problems or domestic abuse.
- is misusing drugs or alcohol themselves.
- has returned home to their family from care.
- is at risk of so-called 'honour' based abuse such as Female Genital Mutilation or Forced Marriage.
- is a privately fostered child, or;
- is persistently absent from education including persistent absences for part of the Academy

day.

19 | Page

A **Child in Need** is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for Children in Need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under Section 17 of the Children Act 1989.

### **Mental Health**

All staff should also be aware that 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. Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. See the Trust's Mental Health Strategy.

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

If staff have a mental health concern that is also a safeguarding concern, immediate action should be taken, following this policy and reporting this to the DSL or a DDSL.

## **5. TAKING ACTION TO ENSURE THAT CHILDREN AND YOUNG PEOPLE ARE SAFE AT THEIR ACADEMY AND AT HOME**

It is not the responsibility of Trust staff to investigate welfare concerns or determine the facts of any disclosure or allegation. All staff, however, have a duty to recognise concerns and report any concerns immediately. All concerns regarding the welfare of students will be recorded and discussed with the DSL (or a DDSL in the absence of the DSL) prior to any discussion with parents/carers.

### **5.1 Staff will Immediately Report:**

- Any suspicion that a child or young person is injured, marked or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play.
- Any explanation given which appears inconsistent or suspicious.
- Any behaviours which give rise to suspicions that a child or young person may have suffered harm (e.g. worrying drawings, writing or acts).
- Any concerns regarding inadequate care, ill treatment or emotional maltreatment.
- Any signs or symptoms of abuse or neglect.
- Any significant changes in presentation, including non-attendance.
- Any hint or disclosure of abuse from any person.
- Any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present).
- Any concerns that a child or young person is at risk of, or involved in, serious violence and/or crime.

Staff should be aware that children with SEND may face additional safeguarding challenges and should ensure that any potential barriers to them reporting concerns are removed.

## 20 | Page

If a teacher, in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this personally to the police, as well as informing the Designated Safeguarding Lead.

Any children who they believe may benefit from Family Help or Early Help, this includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking a Family Help or Early Help assessment.

Concerns will be recorded on CPOMS. If the system is unavailable for any reason, Appendix A should be used.

## 5.2 Responding to Disclosure

Disclosures or information may be received from students, parents/carers or other members of the public. The Academy recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, staff will handle disclosures with sensitivity.

Such information cannot remain confidential and staff will immediately communicate what they have been told to the Designated Safeguarding Lead and make a contemporaneous record. Staff will not investigate but will, wherever possible, elicit enough information to pass on to the Designated Safeguarding Lead in order that they can make an informed decision of what to do next.

Staff will:

- Act immediately if they have any concerns about a child's welfare.
- Reassure victims that they are being taken seriously and that they will be supported and kept safe.
- Listen to and take seriously any disclosure or information that a child or young person may be at risk of harm.
- Try to ensure that the person disclosing does not have to speak to another member of the Academy's staff.
- Try to keep questions to a minimum and of an 'open' nature e.g. 'can you tell me what happened?' rather than 'did X hit you?'
- Try not to show signs of shock, horror or surprise.
- Not express feelings or judgements regarding any person alleged to have caused the harm.
- Explain sensitively that they have a responsibility to refer the information to the Designated Safeguarding Lead.
- Reassure and support as far as possible.
- Explain that action will be taken in their best interests.
- Explain what will happen next and that the child or young person will be involved as appropriate.

### 5.3 Action by the Designated Safeguarding Lead or Deputy Safeguarding Lead

Following any information raising concern, the Designated Safeguarding Lead will consider:

21 | Page

- Any urgent medical needs of the child.
- Making an enquiry to children's social care
- Discussing the matter with other agencies involved with the family.
- Consulting with appropriate persons e.g. police, children's social care etc.
- The child or young person wishes.
- Any suspicion of female genital mutilation will be reported to the police.

Then decide:

- Wherever possible, to talk to parents/carers, unless to do so may place a child or young person at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk.
- Whether to make a safeguarding referral to Children's or Adult Social Care or the Police because a child or young person is suffering or is likely to suffer significant harm OR
  - Not to make a referral at this stage.
  - If further monitoring is necessary.
  - If Family Help or Early Help is appropriate the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. The case must be kept under constant review and consideration given to a referral to social care if the situation doesn't appear to be improving or is getting worse.
  - If it would be appropriate to make a referral for other services.

Referrals should ideally be made by a Designated Safeguarding Lead or Deputy Designated Safeguarding Lead, however in their absence, anyone can make a referral, and their absence must not delay the appropriate action being taken. Where referrals are not made by the designated safeguarding lead the Designated Safeguarding Lead should be informed, as soon as possible, that a referral has been made.

All information and actions taken, including the reasons for any decisions made, will be fully documented.

### 5.4 Action following a child protection and safeguarding referral The

Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will:

- Make regular contact with social care.
- Contribute to the Strategy Discussion and Initial Assessment where required. • Provide a report for, attend and contribute to any subsequent child protection and safeguarding conferences.
- If the child or children have a Child Protection Plan, contribute to the Child Protection Plan and attend Core Group Meetings and Review Child Protection Conferences. • Share all reports with parents/carers prior to the meetings.

- Where in disagreement with a decision made by social care this must be escalated by the Designated Safeguarding Lead according to the local dispute resolution procedures.
- Where a child subject to a Child Protection Plan moves from an Academy or goes missing, immediately inform the key worker in children's social care.

## **5.5 Recording and Monitoring**

22 | Page

### **Each Academy will record:**

- Name, address, D.O.B, those with parental responsibility, primary carers, emergency contacts, names of persons authorised to collect from the Academy, any court orders, if a child has been subject to a Child Protection Plan.
- Key contacts in other agencies including GP details.
- Any disclosures/accounts from child or others, including parents/carers (and keep original notes).
- All concerns, discussions, decisions, actions taken (dated, timed and signed) and arrangements for monitoring/reviewing.

### **All records should be objective and include:**

- Statements, facts and observable things (what was seen/heard).
- Diagram indicating position, size, colour of any injuries (photographs if appropriate).
- Words the child uses (not translated into 'proper' words).
- Non-verbal behaviours.

All safeguarding documents will be retained in a 'child protection and safeguarding' file, separate from the child or young person's main file. This will be locked away and only accessible to the Academy Principal and Designated Safeguarding Lead. These records will be copied and transferred to any Academy or setting the child moves to, clearly marked 'child protection and safeguarding, Confidential, for the attention of the Designated Safeguarding Lead with responsibility for child protection and safeguarding'.

The Academy will retain all original copies of child protection and safeguarding files until the child's 25<sup>th</sup> birthday.

### **Each Academy will monitor:**

- Injuries/marks
- Attendance
- Changes e.g. mood/academic functioning
- Relationships
- Language
- Behaviour
- Demeanour and appearance
- Statements and comments
- Medicals
- Stories, 'news', drawings
- Response to PE/sport



- Family circumstances
- Parental behaviours/care of child

## **5.6 Supporting the Child and Partnership with Parents/Carers**

- The Trust recognises that the child or young person's welfare is paramount, however, good child protection and safeguarding practice and outcomes rely on a positive, open and honest working partnership with parents/carers.

### **23 | Page**

- Whilst we may, on occasion, need to make referrals without consultation with parents/carers, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child or young person.
- We will provide secure, caring, supportive and protective relationships.
- Children and young people will be given an explanation (appropriate to age and understanding) of what action is being taken on their behalf and why.
- We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child, young person and parents/carers. The Designated Safeguarding Lead will determine which members of staff 'need to know' personal information and what they 'need to know' for the purpose of supporting and protecting the child or young person.

## **5.7 Allegations regarding Person(s) working in or on behalf of the Trust (including volunteers)**

Where an allegation is made against any person working in or on behalf of the Trust, including supply staff and volunteers, that they have:

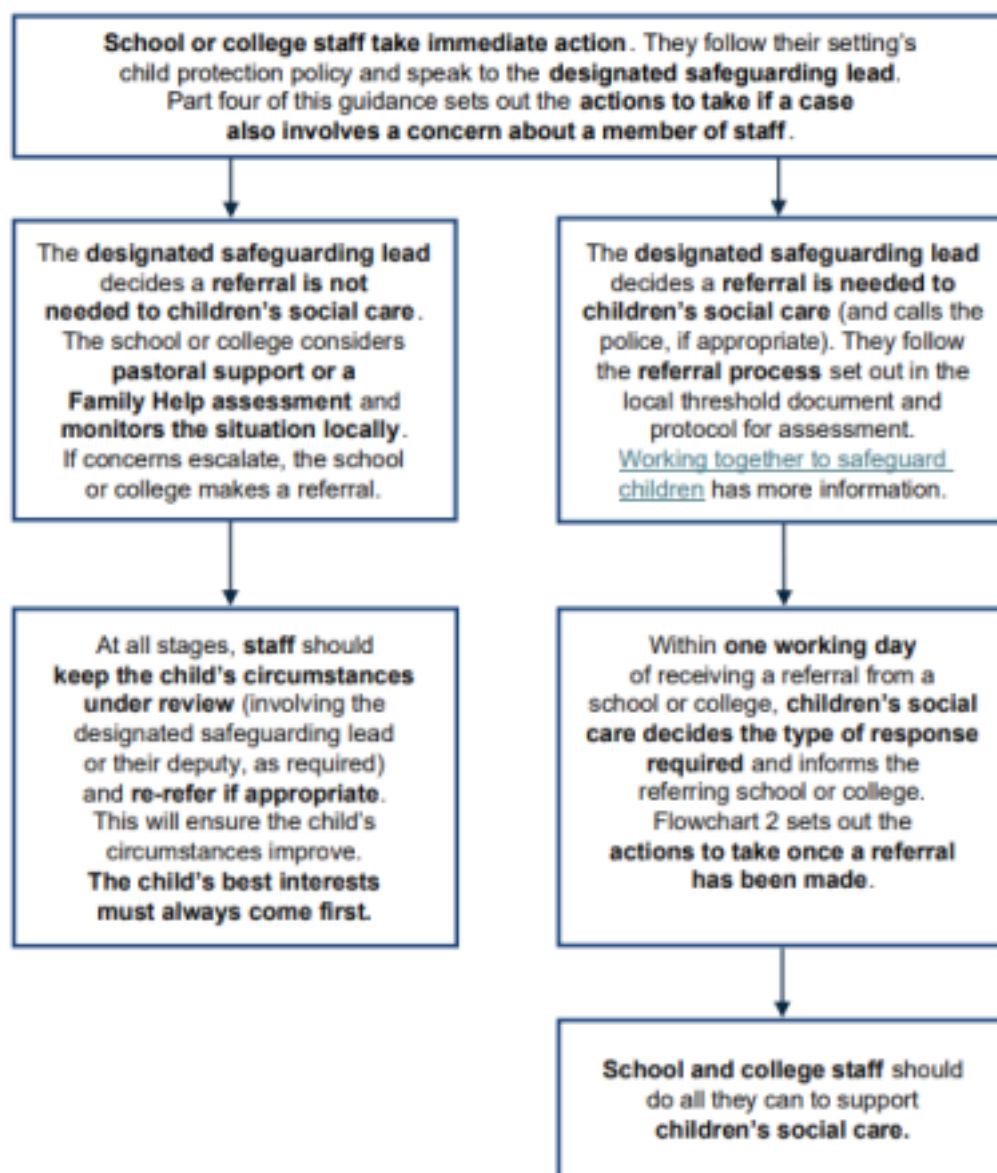
- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Has behaved, or may have behaved, towards a child or children in a way that indicated s/he is unsuitable to work with children; or
- Has behaved, or may have behaved, in a way that indicates they may not be suitable to work with children. This may include an incident outside of Academy which did not involve children but could have an impact on their suitability to work with children e.g. an incident of domestic abuse.

The Trust will follow Keeping Children Safe in Education 2026 guidance in relation to Allegations against a Person who works with Children. Detailed records will be made to include decisions, action taken and the reasons for these. All records will be retained securely as mentioned above. Whilst we acknowledge that such allegations (as all others) may be false, malicious or misplaced, we also acknowledge that they may be founded. It is, therefore, essential that all allegations are investigated properly and in line with agreed procedures.

**Action Flow Chart for Concerns**

The below diagram is from Keeping Children Safe in Education 2026.

Flowchart 1: actions taken by a school or college when there are concerns about a child



## Initial Action

- The person who has received the allegation or witnesses an event will immediately inform their Academy Principal (or Executive Principal if the allegation is against the Principal) and make a record.
- The Principal will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs.
- The member of staff will not be approached at this stage unless it is necessary to address the immediate safety of others.
- The Principal may need to clarify any information regarding the allegation, however, no person will be interviewed at this stage.
- The Principal will consult with the Local Authority Designated Officer (LADO) in order to determine if it is appropriate for the allegation to be dealt with by the Academy or if there needs to be a referral to social care and/or police for investigation.

- Consideration will be given throughout to the support and information needs of students, parents and staff.
- The Principal will inform the Trust's HR Team of any allegation.

Where a staff member feels unable to raise an issue with their Principal, Designated Safeguarding lead or other senior colleague, or feels that their genuine concerns are not being addressed, they should refer to the Trust's Whistleblowing Procedure.

Required further investigations, including suspensions, and any relevant referrals will be managed within the Trust's Staff Disciplinary Procedure.

### **'Low Level' Concerns**

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in the bullet points above. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult working in or on behalf of the Academy may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO (the LADO should be consulted if you are unsure whether the concerns have met the threshold for referral)

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language

As with concerns that meet the 'harm' threshold' low level concerns must be reported as follows:

- to the Designated Safeguarding Lead;
- the Principal is ultimately responsible for the final decision on the action to take); or • where there are concerns/allegations about the Principal, this should be referred to the Chair of the Academy Council and/or the Community Executive Principal.

As with all allegations, lessons should still be learned by the Academy as a result of a low level concern.

### **Supply Staff**

Whilst the Academy is not the employer of supply staff we must ensure that allegations are dealt with properly. Therefore, the Academy will take the lead in any investigation because agencies do not have direct access to children or Academy staff, so they will not be able to collect the facts or liaise with the LADO. In all cases the employer must be informed of the allegations.

## **5.8 Children Potentially at Greater Risk of Harm**

26 | Page

### **5.8.1 Looked After Children and Previously Looked After Children (including those in Kinship Care)**

The most common reason for children becoming looked after is as a result of abuse or neglect. The Academy ensures that appropriate staff have information about a child's looked after status and care arrangements including contact.

The Designated Teacher for Looked After Children and Designated Safeguarding Leads have details of the child's social worker, as well as the name and contact details of the local authority's Virtual Head. They will work with the Virtual Head to discuss how funding can be best used to support progress and meet the needs in their PEP (Personal Education Plan).

### **5.8.2 Children who Need a Social Worker (those on a Child in Need Plan or a Child Protection Plan)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities will share the fact a child has a social worker, and the Designated Safeguarding Lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or unexplainable and/or persistent absences from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services). The Academy will also work with the Virtual Head to ensure that they are able to have oversight of the attendance, attainment and progress of children with a social worker.

### **5.8.3 Mental Health**

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Mental health problems can, in some cases, be an indicator that a child or young person has suffered or is at risk of suffering abuse, neglect or exploitation. All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide.

The Trust has a mental health strategy in place to identify and work with children who may require mental health support. This includes staff training, curriculum development and both student and staff mental health ambassadors.

## 5.8.4 Care Leavers

Local authorities have on-going responsibilities to the young people who cease to be looked after at the age of 18 and become Care Leavers. Designated Safeguarding Leads will have details of the

27 | Page

local authority Personal Advisor appointed to guide and support and will liaise with them as necessary regarding any issues of concern

## 5.9 Work Experience

The Academy has detailed procedures to safeguard students undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with the guidance in Keeping Children Safe in Education 2026. These are detailed within the Academy's Work Experience Policy.

## 5.10 Serious Violence, Harmful Sexual Behaviour and Child on Child Abuse (including harassment and violence)

Serious violence can occur in the context of peer conflict or bullying. It can also be associated with criminal exploitation. There are some children who may be more likely to be involved in serious violence, including those children with disrupted education or a history of offending. Serious violence may involve physical assault and carrying, threatening, or using weapons.

Child on child abuse can take many forms, such as:

- Harassment and violence
- Bullying, including online bullying, prejudice based bullying and faith targeted abuse
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);;
- Sexual violence - includes rape, assault by penetration or sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);.
- Sexual harassment - this can be defined as 'unwanted conduct of a sexual nature' that can occur online or offline. Child on child sexual harassment is likely to; violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Sexting (also known as youth produced sexual imagery) - is when someone shares sexual, naked or semi-naked images or videos of themselves or other or sends sexually explicit messages via mobiles, tables, smartphones or any device that allows you to share media and messages.
- Initiation/hazing type violence and rituals.

### 5.10.1 Harmful Sexual Behaviour (HSB)

HSB can occur between two or more children of any age and sex, from primary through to secondary stage and into Post 16. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable and will not be tolerated.

## 28 | Page

We recognise the escalatory nature of misogyny and the benefits of early identification to support their approach to minimising the risk of HSB, sexual harassment and sexual violence.

We will take a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, including where generated by AI, regardless of whether they are consensual or non-consensual. All such incidents will receive a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

Whilst we recognise the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), **all** child on child abuse or harm will always be taken seriously and acted upon, under the appropriate policy e.g. safeguarding, behaviour, and not dismissed as ‘banter’ or ‘part of growing up’. These issues will be addressed as part of the Personal Development and Growth curriculum and discussions. Victims will be supported through the Academy’s pastoral system.

We will:

- consider guidance in Keeping Children Safe in Education 2026, applicable legislation and our relevant procedures.
- Deal with any reports or disclosures in line with this policy and refer to the Designated Safeguarding Lead (or Deputy).
- Educate about positive, responsible and safe relationships and the unequivocal facts about consent, via the Personal Development and Growth programme and the wider curriculum.
- Educate about the positive, responsible and safe use of mobile technology and social media, including a ban on the use of mobile phones on Academy grounds to ensure that we offer a safe and secure environment.
- Ensure that everyone knows how to report if they witness or experience such abuse and understand that any form of Child-on-child abuse is unacceptable;
- Conduct a risk assessment to determine the specific risks in relation to child on child abuse to which the children at the Academy are, or may be, exposed, assessing, addressing and monitoring those risks;
- never tolerate or normalise this behaviour and are very clear that this is not an inevitable part of growing up;
- not tolerate or dismiss sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- challenge behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts.
- understand that all of the above can be driven by wider societal factors beyond the academy, such as everyday sexist stereotypes and everyday sexist language.

### 5.10.2 Management of incidents of Serious Violence, Harmful Sexual Behaviour and/or

## Child on Child abuse

Any response should:

- include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred: depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation

29 | Page

- treat all children involved as being at potential risk; while the alleged perpetrator may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves.

### 5.10.3 Risk and needs assessment

Following a report of sexual violence, the Designated Safeguarding Lead (or a Deputy) should carry out an immediate risk and needs assessment. The terminology for this work may vary by Academy and/or local authority. For a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment for a report of sexual violence should consider:

- the victim's safety and support needs,
- potential other victims,
- the alleged perpetrator(s),
- the wider school community, including staff and students, and any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms,
- the location and time of the incident, with steps taken to improve safety in that area, if applicable.

The Academy should ensure that a safeguarding response is in place for victims and the alleged perpetrator, and additional sanctioning work may be required for the latter. The Academy should consider:

- that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address the effect of wider sociocultural contexts – such as the child's/ children's peer group (both in and outside the Academy); family; the Academy environment; their experience of crime and victimisation in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child/ children's needs and to mitigate risk;
- the potential complexity of child-on-child abuse and of children's experiences, and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting;
- the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the Designated Safeguarding Lead should discuss the proposed action with the child/ children and their parents, and obtain consent to any referral before it is made.

Child-on-child abuse that involves sexual assault and sexual violence must always result in a multi-agency response. As well as supporting and protecting the victim, professionals need to consider whether the alleged perpetrator could be a victim of abuse too.



Children who display harmful sexual behaviour have often experienced abuse and neglect themselves. Children affected by sexual assault and sexual violence must receive the help they need. A typical response will involve relevant safeguarding agencies and specialist services that support children who demonstrate harmful sexual behaviour. The child and their parent/care will also be included in the response.

### 30 | Page

If the children are in the same class, the Academy should separate them while the concerns are being investigated. In situations of alleged rape and assault by penetration, the alleged perpetrator must always be removed from classes they share with the victim. The Academy should consider how best to keep the alleged perpetrator and victim apart while they are on the same premises, as well as on transport to and from the Academy. Separation arrangements must be continued for as long as is necessary to make sure children are safe. This includes beyond the investigation even if it is inconclusive. Lack of conviction is not the same as the allegation being unfounded.

The Academy will always conduct risk management work in respect of:

- any child who is alleged to have behaved in a way that is considered to be abusive or violent;
- any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child, or any child who may be at risk due to the alleged abusive or violent behaviour by another child as deemed appropriate by the DSL;

Where it is alleged that a child has behaved in a way that is considered to be inappropriate or problematic (as opposed to abusive or violent), the DSL will use their professional judgment – based on the particular concern and/or allegation raised, and the needs and circumstances of the individual child/children in question – to determine whether it would be appropriate to contact children's social care, and to carry out risk management work.

Where other children have been identified as witnesses to alleged abuse or violence, consideration should also be given by the DSL to whether there might be any risks to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them.

The Academy should consider whether disciplinary action may be appropriate for any child/children involved. However, if there are police proceedings underway, or there could be, it is critical that the Academy works in partnership with the police and/or children's social care.

Where a matter is not of interest to the police and/or children's social care, the Academy may still need to consider what is the most appropriate action to take to ensure positive behaviour management. Disciplinary action may sometimes be appropriate, including to:

- ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;
- demonstrate to the child/children and others that child-on-child abuse can never be tolerated; and
- ensure the safety and wellbeing of other children.

#### **5.1.1 Physical Intervention and Use of Reasonable Force**

All staff are encouraged to use de-escalation techniques and creative alternative strategies that are

specific to the child. Restraint will only be used as a last resort and all incidents of this are reviewed, recorded and monitored. Reasonable force will be used in accordance with government guidance and the Trust's Use of Reasonable Force Policy. Safeguarding and welfare concerns will be taken into account when restraint is used on students with SEND.

## **5.12 Alternative Provision**

Where we place a pupil with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and will ensure that the placement meets the pupil's needs.

We will obtain written confirmation from any alternative provision that all relevant checks have been carried out as we would with our own staff. We will share any risk assessments and safeguarding issues where relevant and will regularly visit the provision and our students. We will ensure they have effective safeguarding in place and keep the DSL appropriately informed, this is further detailed in the Trust's Alternative Provision Policy.

## **5.13 Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents. It does not include great-aunts or uncles, great grandparents or cousins. The Academy will notify the local authority if it becomes aware of such arrangements to allow the local authority to check if the arrangement is suitable and safe for the child.

## **5.14 Domestic Abuse**

The definition of domestic abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

Children can witness, be involved in, or be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The Academy will work with the police through Operation Encompass to provide emotional and practical help to children. Through this scheme the police will inform the key adult (usually the Designated Safeguarding Lead) in Academy before the child or children arrive at Academy the Academy has up to date relevant information about the child's circumstances and can give support to the child.

## **5.15 Elective Home Education**

Whilst many home educated children have an overwhelmingly positive learning experience, we know this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. In line with School Attendance (Pupil Registration) (England) Regulations 2024 we will inform their local authority of all deletions from our admission register when a child is taken off roll.

### **32 | Page**

Where a parent/carer has expressed their intention to remove a child from the Academy with a view to educating at home, we will work with other professionals to coordinate a meeting with parents/carers where possible. Ideally, this will be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child.

## **5.16 Children Absent from Education**

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory Academy age who are unexplainable and/or persistent absent from education in their area.

A child going missing from education is a potential indicator of abuse or neglect. Staff should follow the normal academy procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

The law requires all Academies to have an admission register and an attendance register. All students must be placed on both registers.

The Academy's Attendance Manager and/or Education Welfare Officer must inform their local authority of any student who is going to be removed from the admission register where the student:

- has been taken out of the Academy by their parents and the Academy has received written notification from the parent they are being educated outside the system e.g. home education;
- has ceased to attend the Academy and no longer lives within reasonable distance of the academy;
- has been certified by the a medical official as unlikely to be in a fit state of health to attend Academy before ceasing to be of compulsory Academy age, and neither he/she nor his/her parent has indicated the intention to continue to attend the academy after ceasing to be of compulsory Academy age;
- are in custody for a period of more than four months due to a final court order and the

- proprietor does not reasonably believe they will be returning to the Academy at the end of that period; or,
- have been permanently excluded.

The local authority must be notified when the Academy is removing a student from its register for any of the five grounds above. This should be done as soon as these grounds for removal from the register are met, and in any event no later than removing the student's name from the register. It is essential that our Academies comply with this duty, so that local authorities can, as part of their duty, identify children of compulsory Academy age who are missing education and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

### 33 | Page

Academies must also inform the local authority of any student who fails to attend Academy regularly, or has been absent without the academy's permission for a continuous period of 10 Academy days or more, at such intervals as are agreed between the academy and the local authority.

For all cases of a child transferring between Academies or being removed from roll, student records must be transferred securely and in line with Keeping Children Safe in Education 2026 requirements, this will normally include CTF files and hard copy files:

- Student transfer from a previous Academy - student records transferred to new Academy
- Student transfer to a new Academy - student records transferred to new Academy
- Student taken off roll due to being Missing From Education - student records transferred to local authority.

## 5.17 Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides issued by the Crown Prosecution Service to support children 5-11-year old and 12-17 year old. Academy support will be offered in line with this guidance.

**This policy is informed by Keeping Children Safe in Education 2026 and will adhere to all guidance and processes detailed.**

### External contact details

For additional support with safeguarding issues:

- Call 0808 800 5000 (Monday to Friday, 10:00 AM to 4:00 PM).
- NSPCC Helpline Email: Email [help@nspcc.org.uk](mailto:help@nspcc.org.uk) (Seven days a week, 11:00 AM to 4:00 PM).
- Childline (for children and young people under 18): Call free and confidentially at 0800 1111 (available 24/7).
- Emergency Services: Call 999 if a child is in immediate danger.

**Appendix A: Safeguarding Incident Recording Sheet**

(Staff should record using CPOMS - this should only be used if that system is unavailable. Once completed pass to Designated Safeguarding Lead with responsibility for child protection and safeguarding or the Principal)

|                                         |  |
|-----------------------------------------|--|
| Full name of Young Person               |  |
| Date of Birth and Address               |  |
| Year & PDG Group                        |  |
| Date of Incident<br>(day/month/year)    |  |
| Time of Incident (24<br>hour clock)     |  |
| Location                                |  |
| Observed by (full name<br>and position) |  |
| Detailed Observation                    |  |
| Concerns                                |  |
| Have you spoken to the<br>person?       |  |

|                                                              |  |
|--------------------------------------------------------------|--|
| What was said? (Please record in the person's own words)     |  |
| Have you spoken to parents/carers?                           |  |
| What was said? (include full name of parent/carer spoken to) |  |
| Referred to                                                  |  |
| Your Name                                                    |  |
| Your Position                                                |  |
| Signed                                                       |  |
| Date and Time of Record                                      |  |

## Appendix B: Further detail on Child Criminal and/or Sexual Exploitation (CSE)

The sexual exploitation of children is defined by the DfE as:

‘Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.’

Outwood Grange Academies Trust adheres to Keeping Children Safe in Education 2026 guidance and refers to the relevant local authority procedure in relation to child criminal and/or sexual exploitation. This is our policy to summarise our position.

We recognise that child criminal and/or sexual exploitation is a high profile issue both nationally and locally. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### Child Criminal Exploitation

Child Criminal Exploitation (CCE) CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial or other advantage of the perpetrator or facilitator and/or
- (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and • children who regularly miss Academy or education or do not take part in education.

### Child Sexual Exploitation

Child sexual exploitation can happen in a number of ways to both boys and girls, for example it can happen in the virtual world through various social media and this can still cause significant

### 36 | Page

harm. It can happen through inappropriate relationships such as older boy/girlfriends or through parties, gangs or organised abuse. Some children will be particularly vulnerable to being exploited, for example if they have had a chaotic upbringing or if they are in care or go missing, involved in gangs or being bullied. We recognise however that any child can become a target for exploitation, particularly where the internet and social media are involved. This is because the normal life events that go with being a child or teenager in today's age can be a challenge and make them susceptible to being groomed and exploited.

Some of the following signs may be indicators of CSE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation; ○ Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant; ○ Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and ○ Children who regularly miss Academy or education or do not take part in education.

As a Trust we recognise that prevention is the best position with regard to CCE/CSE. We seek to support children to develop confidence and build resilience. We will endeavour to support their age appropriate knowledge and raise awareness and understanding of what CCE/CSE is, to understand the risks of CCE/CSE and to spot the warning signs for themselves and also their friends and peers and by doing so, keep safe.

What marks out exploitation is an imbalance of power within the relationship. The perpetrator always holds some kind of power over the victim, increasing the dependence of the victim to an exploitative relationship.

Technology can play a part in exploitation, for example, through its use to record abuse and share it with other like-minded individuals or as a medium to access children and young people in order to groom them. A common factor in all cases is the lack of free economic or moral choice.

Sexual exploitation has strong links with other forms of 'crime', for example, domestic violence, online and offline grooming, the distribution of abusive images of children and child trafficking. Many adults involved in prostitution describe difficult childhood experiences that include domestic violence, neglect, emotional abuse, disrupted Academy and low educational attainment.

The perpetrators of sexual exploitation are often well organised and use sophisticated tactics. They are known to target areas where children and young people gather without much adult supervision, e.g. parks or shopping centres or sites on the internet.

#### Preventing sexual and criminal exploitation

The effects of sexual exploitation are harmful and far reaching. Prevention means that the risk that children and young people will become victims of sexual exploitation is reduced by:

- Reducing their vulnerability by educating young people, whilst acknowledging that all young people are vulnerable;
- Improving their resilience and enabling the confidence to report

concerns; 37 | Page

- Disrupting and preventing the activities of perpetrators;
- Reducing tolerance of exploitative behaviour.

If prevention is not possible we aim to identify children who are at risk of, or being exploited very early. Early intervention is key to effectively working with the child to prevent or reduce the level of risk. Once they have been groomed some children will find it difficult to withdraw from their abusers and we need to contribute to helping to protect them. Some children feel that they are in a relationship with these people. We commit to working with our inter-agency partners to safeguard and protect children.

Much of this work will be through our programmes of Personal Development and Growth or through our Relationships and Sex Education (RSE) work.

An important part of educating our children is focussing on what is a healthy relationship and issues of consent. This will also target potential abusers at an early age with the intention of helping to shape their attitudes to others.

We want to have a culture where the welfare of children is actively promoted and staff and students are vigilant. As part of this children will feel listened to and safe.

#### Social Media

The use of media and technology are often a common feature of the social activity of most young people. Smart-phones, laptops and tablets can all be used to exchange information verbally, by text,



e-mail and most commonly through mechanisms such as messengers, Facebook, Instagram, WhatsApp etc. The use of electronic media presents considerable opportunities to abusers and provides powerful tools with which to groom and control victims. Grooming is defined as developing the trust of a young person or his or her family in order to engage in illegal sexual conduct. It may include:

- Causing a child to watch a sexual act, e.g. sending sexually themed adult content or images and videos featuring child sexual abuse to a young person. This could be via text messaging;
- Inciting a child to perform a sexual act, e.g. by threatening to show sexual images of a child to their peers or parents/carers (e.g. self-produced material or even a pseudo-image of the child);
- Suspicious online contact with a child, e.g. asking a young user sexual questions;
- Asking a child to meet in person; befriending a child and gaining their trust, etc.
- It is also known that abusers and exploiters will sometimes pose as teenagers to obtain sexually explicit images via webcams or making arrangements to meet the victim. Often these individuals live some considerable distance from the victim and initially make contact through legitimate sites used by young people.

#### Working with the victim or perpetrator

When you are working with an incident or with a student that has been the victim or perpetrator of CSE you should consider the following areas:

- **A child-centred approach.** Action should be focussed on the child's needs, including consideration of children with particular needs or sensitivities, and the fact that children do not always acknowledge what may be an exploitative or abusive situation;
- **A proactive approach.** This should be focussed on prevention, early identification and intervention as well as disrupting activity and prosecuting perpetrators;

#### 38 | Page

- **Parenting, family life, and services.** Taking account of family circumstances in deciding how best to safeguard and promote the welfare of children and young people, this should be done in coordination with local authority support;

- **The rights of children and young people.** Children and young people are entitled to be safeguarded from sexual exploitation just as Academies and agencies have duties in respect of safeguarding and promoting welfare;

- **Responsibility for criminal acts.** Sexual exploitation of children and young people should not be regarded as criminal behaviour on the part of the child or young person, but as child sexual abuse. The responsibility for the sexual exploitation of children lies with the abuser and the focus of police investigations should be on those who coerce, exploit and abuse children and young people. If there is a criminal investigation the academy will encourage the victim to seek support from nominated people in the Academy. Students either involved or who have knowledge of an investigation should not discuss this in the academy as it is an ongoing investigation;

- **An integrated approach.** The working together to safeguard children document sets out a tiered approach to safeguarding: universal, targeted and responsive. Within this, sexual exploitation requires a three-pronged approach tackling prevention, protection and prosecution. The academy will be involved in the first two elements and will support the student(s) involved and work with agencies to meet the three-pronged approach.

#### County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more areas within the UK, using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including Academies, further and higher educational institutions, pupil referral units, special educational needs Academies, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and Academy), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism will be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral will be undertaken by the DSL/DDSL alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

## **Appendix C: Additional information on ‘So-called Honour’ Based Abuse**

So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts you should speak to the designated safeguarding lead.

If staff have a concern regarding a child that might be at risk of HBV they should follow the normal reporting procedures protocols for multi-agency liaison with police and children’s social care.

### **Female Genital Mutilation (FGM)**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Where FGM has taken place there is now a mandatory reporting duty placed on **teachers**.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for

teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still discuss any such case with the academy’s designated safeguarding lead and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

## Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

## Breast-ironing

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or

## 40 | Page

grandmothers and the men in the family are unaware. The Crown Prosecution Service (CPS) has updated the So-Called Honour-Based Abuse and Forced Marriage guidance to recognise breast-ironing as child abuse. CPS legal guidance makes clear to police and prosecutors that breast-ironing is a crime even if it is said that the victim has consented.

Further information is available in the following documents: Multi-Agency Statutory Guidance on Female Genital Mutilation and Multi-Agency Statutory Guidance: Handling cases of forced marriage.

