

Child Protection and Safeguarding Policy

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Policy history:

Approved by:	FGB		Date: Advent Term 2025
Last reviewed on:	June 2025	Next review due: January 2026	
Version	Internal		

Linked policies and procedures:

Policy Name
Behaviour policy
Equality and cohesion policy
Anti-bullying policy

Complaints policy
Low-level concerns policy
Safer recruitment policy
Online safety policy
Premises hire policy
Careers Education Information Advice and Guidance Policy



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1. Philosophy

Safeguarding is the concern of everybody at St. Paul's Catholic School. We are committed to promoting the welfare of every member of the school community, ensuring that they are not only safe but also feel safe. We strive to provide a safe space that children, staff and parents/carers are able to talk about any safeguarding concerns and feel assured we will listen to their concerns. We look to ensure that all staff and volunteers are aware of and implement safeguarding procedures and guidance, including what to do if they suspect a child or young person may be experiencing, or be at risk of, harm. This is revisited and reviewed regularly.

2. Legislation and statutory guidance.

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by MK Together, our safeguarding partnership. [Home | mk-together \(mktogether.co.uk\)](#)

This policy is also based on the following legislation:

- › Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- › [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- › [The Children Act 1989](#) (and [2004 addition](#)), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children and amendments November 2021.
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- › [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to

support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

3. Local Child Protection Procedures

St. Paul's Catholic School is committed to a multi-agency approach, working with children and young people to ensure the best outcomes. We are bound by the overarching statutory inter-agency guidance 'Working Together to Safeguard Children 2023'.

St Paul's will work alongside the safeguarding partnership as identified in Keeping Children Safe in Education and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017.

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

We will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs alongside MK Together who provide detailed information on what to do if you have a concern and how to make a referral; safer recruitment guidance; and managing allegations against staff (LADO guidance). They also include a range of other guidance regarding more specialist safeguarding topics.

<https://www.mktogether.co.uk/>

4. Definitions

Safeguarding and promoting the welfare of children means:

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

Early help indicators which staff should be aware of are:

- Any child who has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- Any child who has a parent or carer in custody or is affected by parental offending
- Any child who is frequently missing/goes missing from education, home or care

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

See [Appendix One](#) for further safeguarding definitions and issues.

5. Equality statement

Please refer to the St Paul's Catholic School [Equality and Cohesion Policy](#).

6. Roles and Responsibilities

All staff and volunteers within St. Paul's Catholic School have a responsibility to protect its pupils. There are, however, key people in the school and the Local Authority who have specific responsibilities under child protection procedures. The names of those carrying out these responsibilities in school for the current year are listed at the front of this document.

The Governing Body and the School Leadership Team ensure that the Designated Leads for Safeguarding receive the necessary training, have access to the resources needed to enable them to carry out their responsibilities and have regular professional supervision to support them in this role. They are given time to effectively fulfil the duties that their role demands. The school leadership team not only ensures that the Designated Lead for Safeguarding and Safeguarding team attends the required training but also that training is refreshed every two years. They have a responsibility to regularly audit and check that all policies and procedures are effective and work in practice.

All other staff (teaching and non-teaching) undertake child protection training annually with a given focus on a particular area of safeguarding within the local context. All staff will also receive regular safeguarding updates through briefings and bulletins so that they are kept up to date with emerging issues. New staff must receive an induction which includes safeguarding training.

It is expected that all staff and governors understand and adhere to Part One of [Keeping Children Safe in Education](#) (September 2025) Statutory advice for schools and colleges and are able to demonstrate that they have understood its contents. All staff will acknowledge that this has been undertaken at the start of each academic year with the school keeping a record that this has taken place.

Staff are encouraged to make known their smallest concerns and recognise that the information they provide may well be contributing to a broader picture developing with the Designated Safeguarding Lead ([Low-level Concerns policy](#)). It is emphasised that 'it is not acceptable to do nothing' where there is a concern and staff should never assume a colleague will take action and share information regarding an incident both have witnessed. It is critical in keeping children safe that all staff demonstrate individual responsibility for reporting incidents and it is highlighted that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care.

6.1 The role of the Designated Safeguarding Lead

The Designated Safeguarding Lead is a member of the SLT, and responsible for leading on safeguarding and child protection at St. Paul's Catholic School. The key role of the Designated Safeguarding Lead is to:

- Manage referrals from school staff or any others from outside the school;
- Work with external agencies and professionals on matter of safety and safeguarding;
- Undertake training;
- Raise awareness of safeguarding and child protection amongst the staff and parents; and ensure that child protection information is transferred to the pupil's new school
- Be aware of pupils who have a social worker
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.
- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and multiagency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly. Records should be kept documenting the rationale behind all decisions.
- Have a good understanding of harmful sexual behaviour
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- Lead on filtering and monitoring, ensuring procedures are in place and staff are fully aware of how these protect children.
- The Designated Safeguarding Lead will also keep the Headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the Designated Safeguarding Lead and deputies are set out in their job description.

6.2 The role of the Nominated Governor for Safeguarding

The role of the Nominated Governor for Safeguarding is to ensure that the school has an effective child protection policy and that the policy and structures supporting safeguarding children are reviewed annually. Governors are not given details relating to individual child protection cases or situations, in order to ensure confidentiality is not breached.

6.3 Training

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, neglect or exploitation. This training will be regularly updated and will be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning

All staff will have regular training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

The Designated Safeguarding Lead and safeguarding team should attend multi agency training every three years to ensure they understand the importance of interagency working.

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing effective strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding
- Audit or commission audits to ensure that safeguarding procedures and policies are fully implemented and understood.
- Ensure the Single Central Record is updated regularly and effectively captures all required information and checks undertaken.

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

The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead will also deliver assemblies to all pupils each term to teach them how to keep themselves and others safe, including online. This will be supported by the schools PSHE and RSE curriculum.

7 Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

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

Ideally all referrals should be instigated by the Designated Safeguarding Lead or a member of the safeguarding team. However, staff should make an immediate referral to the police if they believe a child is suffering or likely to suffer from harm, or is in immediate danger. If the concern is less serious then staff should contact the Designated Safeguarding Lead (or safeguarding Team) who will contact the Milton Keynes MASH team (01908 253169) for further advice using the contact details found here <https://www.milton-keynes.gov.uk/children-young-people-and-families/milton-keynes-multi-agency-safeguarding-hub-mash> .

All staff should inform the Designated Safeguarding Lead as soon as possible if they make a referral directly. Staff should make a direct referral if it involves the Designated Safeguarding Lead, or a member of their family, if no Designated Safeguarding Lead is available. If it is an immediate risk (phone the Police) or if the Designated Safeguarding Lead has said that a referral does not need to be made and the staff member believes it must be referred in.

7.2 If a child makes a disclosure to you

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

- . Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- . Do not shut them down
- . Stay calm and do not show that you are shocked or upset
- . Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- . Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- . Record your conversation as soon as possible on CPOMS or in writing using the incident report sheets in reception. Records should be in the child's own words. Stick to the facts, and do not put your own judgement on it
- . If the conversation is written, then please sign and date the record and pass it on to the Designated Safeguarding Lead immediately.
- . Report all incidents as soon as possible. Do not leave school site without reporting.

Please refer to the flowchart for safeguarding concerns ([Appendix Two](#)).

7.3 If you have concerns about a child

Please record all concerns on CPOMS or in writing using the incident report sheets in reception. and where possible, speak to the Designated Safeguarding Lead. If in exceptional circumstances the Designated Safeguarding Lead is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from the Milton Keynes MASH team (01908 253169). You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the Designated Safeguarding Lead as soon as practically possible.

7.4 Early help assessment

If an early help assessment is appropriate, the Designated Safeguarding Lead (or a member of the safeguarding team) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

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

7.5 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the Designated Safeguarding Lead will make the referral or support you to do so. If you make a referral directly then you must tell the Designated Safeguarding Lead as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome (within 28 days) The Designated Safeguarding Lead or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. If the referral is refused and the Designated Safeguarding Lead believes it needs to be picked up, then the Designated Safeguarding Lead will instigate the escalation process and record each step and outcome.

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

7.6 Record keeping

The school uses an electronic system (CPOMs) to record all safeguarding concerns. Staff are aware that they must make a record of safeguarding concerns as soon as possible as well as not assume that other members of staff have reported an incident of which they have knowledge. Staff are encouraged to report the smallest of concerns as well as significant concerns, so that the Designated Safeguarding Lead is able to build a full picture relating to any potential concerns. It is emphasised that if they are in any doubt about reporting a Safeguarding issue, then they should do so as the fact that they are questioning makes it a concern.

All safeguarding records are stored separately from a child's academic file which the Designated Safeguarding Lead manages.

Where students leave St Paul's, the Designated Safeguarding Lead will ensure their safeguarding file (both electronic and paper where relevant) is transferred to the new school or college. This would be sent separately from their main student file and within 5 days for an in-year transfer or within the first 5 days of the start of a new term following a request from a school or college where a student is to be taken on roll). Where paper records need to be transferred school will ensure secure transit with confirmation of receipt obtained. The designated Safeguarding Lead will also take responsibility for receiving such files from other establishments when students move to St Paul's, sharing information with relevant staff where appropriate. The Designated Safeguarding Lead may also choose to share information with a new school or college in advance of a child leaving (on a case by case basis) in order to allow them to have support in place for when the child arrives and to protect other children.

7.7 Reporting systems for pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations. However, we understand that we have a legal duty to report any child protection concerns to MASH. There may be times where a child or parent does not consent to information being shared, but to protect the child or if it is in the public interest that we are required to share information. If there is any doubt the school will seek independent legal advice.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse (Sharepoint safeguarding button, access to Year Leaders/Chaplaincy and Pastoral Leaders)
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

8 Safeguarding concerns

All staff must refer to **Section 7** (Recognising abuse and taking action), if faced with any of the safeguarding concerns below.

8.1 Abuse, Neglect and Exploitation

Children can be at risk of abuse, neglect and exploitation both in side and outside of home, school and also online.

Abuse: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts 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 another child or children.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

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

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment
- Provide suitable education
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

8.2 Female Genital Mutilation (FGM)

While all staff should speak to the Designated Safeguarding Lead (or Deputy) with regard to any concerns about female genital mutilation (FGM) it is emphasised that if a member of staff becomes aware that an act of female genital mutilation appears to have been carried out on a girl under the age of 18, the teacher and Designated Safeguarding Lead must report this jointly to the police.

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

Any teacher who either:

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

Must immediately report this to the Police (101), personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the Designated Safeguarding Lead and involve children's social care as appropriate. Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the Designated Safeguarding Lead and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils. Any member of staff who suspects a pupil is at risk of FGM, suspects that FGM has been carried out or discovers that a pupil aged 18 or over appears to have been a victim of FGM, then they should speak to the Designated Safeguarding Lead and follow our local safeguarding procedures.

8.3 Radicalisation and extremism

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence'
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system
- The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The Designated Safeguarding Lead and all staff will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk regularly.

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

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

We ensure that staff are aware that a high number of radicalisation cases, involve children being radicalised online. These children are often quiet, not drawing attention to themselves as they have been told to not raise any concerns.

Any radicalisation concerns will initially be referred to MASH, with a follow up call to the Police (101) and completion of a Prevent referral form which is forwarded to Thames Valley police for consideration by the Channel Panel.

<https://www.milton-keynes.gov.uk/adult-social-care/safeguarding-adults-and-children/prevent>

8.4 Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the Designated Safeguarding Lead to agree a course of action.

Please refer to the St Paul's Catholic School [Promoting Positive Mental Health and Wellbeing Policy](#) or speak to the school's Senior Mental Health Lead (Paul Knight) for further guidance.

8.5 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 importing 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 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. A child criminal exploitation toolkit can be undertaken to help practitioners identify children who have been exploited.

[Useful resources and forms | mk-together \(mktogether.co.uk\)](https://mktogether.co.uk) .

8.6 SEND

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges

Any abuse involving pupils with SEND will require close liaison with the Designated Safeguarding Lead (or deputy) and the SENCO. Staff should not presume that changes in behaviour are due to the child’s special educational need.

8.7 Domestic abuse

The [Domestic Abuse Act 2021](#) (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are ‘personally connected’ to each other:

- Physical or sexual abuse;
- Violent or threatening behaviour;
- Controlling or coercive behaviour;
- Economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- Psychological, emotional or other abuse.

People are ‘personally connected’ when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

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

Milton Keynes has a very high rate of reported domestic abuse incidents, staff should always consider child protection when there is domestic abuse is identified.

St Pauls is signed up to Encompass which means they are notified of all high risk domestic abuse incidents, where there children live in the household, the day after that incident.

8.8 Child Criminal Exploitation (CCE)

Child Criminal Exploitation (CCE) occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity which may involve (a) the exchange for something the victim needs or wants, and/or (b) the financial or other advantage of the perpetrator or facilitator and/or (c) 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.

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 school or education or do not take part in education

A child criminal exploitation toolkit can be undertaken to help practitioners identify children who have been exploited.

[Useful resources and forms | mk-together \(mktogether.co.uk\)](https://mktogether.co.uk)

9 Child on child abuse

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously. Most cases of pupils hurting other pupils will be dealt with under our [School's Behaviour Policy](#) and Low-level concerns policy. However, safeguarding concerns will arise if the following incidents:

- Are serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Are violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See [Appendix One](#) for more information about child-on-child abuse.

All child on child abuse incidents are logged and risk assessments undertaken considering the victim, perpetrator, staff and other children. If a pupil makes an allegation of abuse against another pupil then please refer to **Section 7.2.**

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

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos you must report it to the Designated Safeguarding Lead immediately.

You must **not**:

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

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

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

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

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

10. Online safety

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

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors

- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

10.1 The 4 key categories of risk

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

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

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

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

Train staff on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.

Educate parents/carers about online safety via our website, communications sent directly to them and during parent information evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. Where a school laptop is loaned to a child, parents/carers and pupils will sign a laptop loan agreement.

Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.

10.2 Artificial intelligence (AI)

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

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

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education. Add any additional procedures you may have in place for dealing with safeguarding concerns related to AI – for example where indecent images have been shared that are AI-generated.

11. Pupils with a social worker

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

The Designated Safeguarding Lead and all members of staff will work with and support social workers to help protect vulnerable children. It is a requirement that the Designated Safeguarding Lead must be informed of all children who have a social worker and should be involved in discussions around their safety.

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

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

12. Looked-after and previously looked-after children

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

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

We have appointed a designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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

As part of their role, the designated teacher will:

Work closely with the Designated Safeguarding Lead to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

- Be a central point of contact within the school to support the education of the child on a day to day basis
- Work directly with the carers, parents or guardians of looked-after and previously looked-after children
- Take responsibility for the development and implementation of the looked-after children's PEP
- Take responsibility for ensuring that school staff understand how looked-after children and previously looked-after children learn
- Be a sources of advice for teachers
- Promote a culture across the school which allows looked-after children and previously looked-after children to discuss their progress and participate in wider school activities
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

13. Allegations about a staff member, supply teacher, volunteer or any adult undertaking work within the school

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible.

Examples of harm towards a child are:

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

If the concerns/allegations are about the Headteacher, speak to the chair of governors.

The Headteacher/chair of governors will then follow the procedures set out in the [Confidentiality Reporting Policy](#).

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Headteacher, report it directly to the Local Authority Designated Officer (LADO) for advice and information on 01908 254307 or email us at LADO@milton-keynes.gov.uk.

Please refer to the Low-Level Concerns Policy and [Confidentially Reporting Policy](#).

14. Confidentiality

St. Paul's Catholic School is guided by MK Together procedures for information sharing and confidentiality. While the school aims to remain compliant with the [Data Protection Act 2018](#) and General Data Protection Regulation (GDPR) this will not stand in the way of the school to

promote the welfare, and protect the safety of a child or young person. Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the [Children Act 1989](#) if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. To this end the school will cooperate fully with external agencies to ensure the safety of a child or young person.

All staff should note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Independent legal advice may be sought if necessary
- Please also refer to the St. Paul's [Confidentiality Reporting Policy](#).

15. Pupils educated offsite, alternative provision and part time timetables

Pupils are dual rolled (St Paul's remaining the main school) when their education is redirected to an alternative educational provider or while they are undergoing a 'Managed Move' to another school. We maintain responsibility for the Safeguarding of these pupils although their day to day educational provision would be elsewhere. School will ensure any provision meets the needs of its pupils and that appropriate Safeguarding checks have been carried out on individuals working in the establishments of alternative providers. An agreement must be in place alongside regular communication.

Where a pupil has a period of absence which is authorised by the school due to their personal circumstances, school will continue to provide an education and ensure that appropriate safeguarding procedures remain in place. This would involve maintaining regular contact with the pupil and family, reviewing such provision to ensure the child remained safe and that its arrangements in place continued to meet the needs of the student.

Where absence is unauthorised and school were to lose contact with a family or not physically see a student on roll for more than 10 school days, then the relevant agencies would be informed and a police welfare check requested depending on the circumstances of the absence.

The school will endeavor to return children in alternative education back to the originating school as soon as it is possible to do so.

16. Work experience

It is the duty of St Paul's to ensure that all students are safe when involved in any form of off-site activity. Prior to any student taking up a work experience placement, a risk assessment will have taken place prior to the placement commencing. Such risk assessments are undertaken through the external work experience placement provider. Contact arrangements are put in place and it is the aim of the school to ensure that each child is visited by a member of staff at least once during the duration of the placement. Work prior to the period of work experience is undertaken with more vulnerable students with additional checks made in the early days of a placement to ensure the success of this experience for them. Students are fully equipped with the necessary strategies to manage contact with school if there are any concerns while on placement and School will have no hesitation in terminating a placement where concerns are not addressed by an employer.

The organisation the child is being placed with must also be made aware of any additional support the student may need. If the placement is in a school, nursery or other provision where children or vulnerable adults attend, we must consider the safety of the children/vulnerable adults in that provision and ensure that the placement has any relevant information needed to risk assess or make a decision about the suitability of the placement.

Please refer to the [Careers Education Information Advice and Guidance Policy](#) .

17. Safer Recruitment

The governing body and school leadership team are responsible for ensuring that the school follows the safer recruitment processes in accordance with government requirements and MK Together procedures, including:

- Ensuring the Head Teacher, other staff responsible for recruitment and at least one member of the governing body, completes safer recruitment training;
- Ensuring that on any recruitment panel at least one person has completed an accredited safer recruitment course (every 3 years).
- Ensuring the upkeep of a Single Central Record of all staff , regular volunteers, contractors, etc;
- Ensuring written recruitment and selection policies and procedures are in place;
- Ensuring a criminal disclosure check is made and applicants are aware of it
- Ensuring a online check is made on all applicants and addressed during interview (applicants must be notified that it will be undertaken)
- Adhering to statutory responsibilities to check staff who work with children;
- Taking proportionate decisions on whether to ask for any checks beyond what is required;
- Ensuring that volunteers and other visitors to school are appropriately supervised.
- Ensuring intimate care is only undertaken by staff known to the child and with a barred list check in place (confirmed by SLT)

[Please refer to the St. Paul's Safer Recruitment Policy.](#)

18. Use of school premises by other organisations.

Where services or activities are provided separately by another body using the school premises, the governing body will seek assurance that the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection. All hirers working with young people below the age of 18 are required to be registered or undergoing registration with the Milton Keynes Council Youth Registration Scheme for safeguarding and good practice on an annual basis. A copy of the certificate will be required each year.

St Pauls will be required to see relevant documentation for all organisations working with children and St Pauls must be notified of any safeguarding incident involving children or their staff or volunteers.

Please refer to the [Premises Hire Policy](#).

Contacts and Further Information

To make a referral or consult Children's Services regarding concerns about a child:

Multi-Agency Safeguarding Hub (MASH):

Tel: 01908 253169 or 253170 during office hours or

Emergency Social Work Team 01908 265545 out of office hours

email: children@milton-keynes.gov.uk

For allegations about people who work with children:

Contact the MASH as above

Or:

Local Authority Designated Officer (LADO)

Tel: 01908 254307

email: lado@milton-keynes.gov.uk

Appendix 1: Specific safeguarding definitions and issues

Intra-Familial Harm

These offences reflect the modern family unit and take account of situations where someone is living within the same household as a child or that the child regards as family and assuming a position of trust or authority over that child, as well as relationships defined by blood ties, adoption, fostering, marriage or living together as partners.

Extra-Familial Harm

Extra-familial abuse is linked to 'contextual safeguarding' or 'complex safeguarding'. These concepts refer to harm that occurs to children outside of their family system, often during the adolescent years because at this age their social networks widen. These networks can have a significant influence over an adolescent's understanding of social norms.

Children missing from education

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

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

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

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

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

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

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

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

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

Child sexual exploitation

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

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

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

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

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

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

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

Child-on-child abuse

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

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

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

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

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

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

Domestic abuse

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

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

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

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

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

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

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

Homelessness

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

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

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

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

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

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

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

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- › A pupil confiding in a professional that FGM has taken place

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

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

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

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

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

The DSL should report through MASH and directly to the police under the mandatory duty to report (101) In addition a FGM screening tool should be completed.

Forced marriage

The minimum age of marriage was changed to 18 years in 2023. Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Staff will receive training around forced marriage and the presenting symptoms.

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

The DSL will:

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

Preventing radicalisation

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

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

- › Becoming invisible, deliberately not drawing attention to themselves and deliberately deflecting any questions or queries

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

Nearly all cases of radicalisation happen online, so children who are secretive about their online activities or engaged with concerning groups or discussion should be considered.

If staff are concerned about a pupil, they will follow our procedures set out in section 7 of this policy, including discussing their concerns with the DSL.

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

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

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

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

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

- › Being male
- › Having been frequently absent or permanently excluded from school
- › Having experienced child maltreatment
- › Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign using our electronic system (Inventry) and wear an appropriate visitor's badge.

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

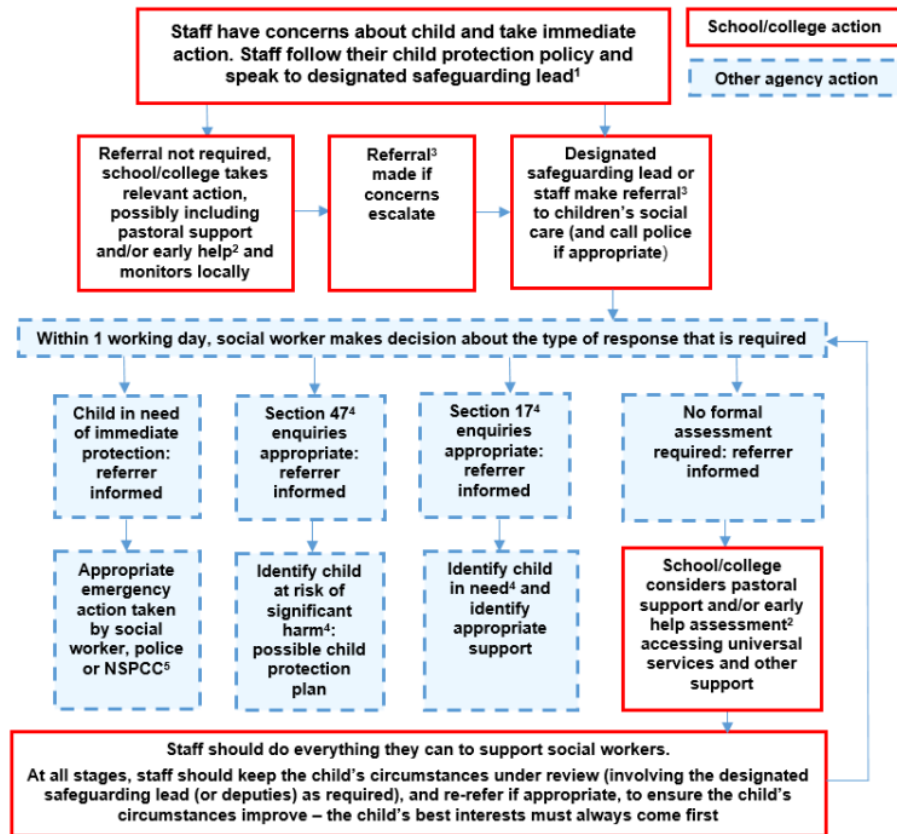
- › Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- › The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if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

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



using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Actions where there are concerns about a child



Appendix 2: Flowchart for Safeguarding Concerns

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>