Safeguarding & Child Protection Policy

2026 – 2027

Manorfield CE Primary School

Embrace Multi Academy Trust strives to maintain and improve good provision and outcomes at each of its member schools. Based upon our shared ethos and our values of wisdom, collaboration, respect, integrity, inclusivity, and compassion, we aim to support the learning and development of every person within the trust, and our policies are written from this perspective.

Version	Approval Level	Document History	Date Approved	Next Review
V1	Full Trust Board	Approved	10/08/2026	Sept 2027
V2	Full Trust Board	Updates reflecting LA amendments*	05/10/2026	Sept 2027

* See update section at end of document

Important Contacts

Role / organisation	Name	Contact details
Designated Safeguarding Lead (DSL)	Mrs Ellen Thompson	dsl@manorfield.embracemat.org 01455 272787
Deputy DSL(s)	Mrs Leanne Jones Mrs Jaime Webster Mrs Lauren Roach	dsl@manorfield.embracemat.org 01455 272787
Chair of Governors	Mrs Kathryn Bullock	kbullock@manorfield.embracemat.org
Trust DSL	Felicity Clarke	• 0116 482 0880
Designated Safeguarding and Child Protection Trustee	Lucy Carlisle	• 0116 482 0880
Local Authority Designated Officer (LADO)	Kim Taylor / Lovona Brown	• CFS-LADO@leics.gov.uk • 0116 305 4141 (Mon-Thu 8.30am-5.00pm, Fri 8.30am-4.30pm)
Leicestershire First Response Children's Duty Team	County Hall, Glenfield	• 0116 305 0005 (for urgent same-day concerns) • childrensduty@leics.gov.uk
Police	-	• 999 (in an emergency) • 101 (to report a crime where there is no immediate danger)
NSPCC whistleblowing helpline	-	• 0800 028 0285 • help@nspcc.org.uk
Channel / Prevent advice	-	• 020 7340 7264 • counter.extremism@education.gov.uk (not for emergencies)
LA Safeguarding Children in Education Officer	Charlotte Davis	• 0116 305 6314
Local safeguarding procedures	Leicester, Leicestershire and Rutland Safeguarding Children Partnerships	• https://llrscb.proceduresonline.com/contents.html

Contents

Important Contacts 2
1. Aims 5
2. Legislation and statutory guidance 5
3. Definitions 6
4. Equality statement 7
5. Roles and responsibilities 7
5.1. All staff 7
5.2. The Designated Safeguarding Lead (DSL) 8
5.3. The Board of Trustees and Local Governing Committees (LGC) 9
5.4. The Headteacher 9
5.5. Virtual School Heads 10
6. Confidentiality and information sharing 10
7. Recognising abuse, neglect and exploitation and taking action 10
7.1. Vulnerable Children (including those with Early Help and Child Services support as well as young carers) 11
7.2. If a child is suffering or likely to suffer harm, or is in immediate danger 11
7.3. If a child makes a disclosure 11
7.4. If staff have concerns about a child 12
7.5. FGM 12
7.6. Extremism and radicalisation 13
7.7. Mental health concerns 13
7.8. Concerns about a staff member, supply teacher, volunteer, contractor or organisation using school premises 13
7.9. Allegations of abuse made against other pupils 13
7.10. Violence Against Women and Girls (VAWG), misogyny and harmful gender-based attitudes 15
7.11. Sharing of nudes and semi-nudes 17
7.12. Reporting systems for our pupils 19
7.13. Private Fostering 19
8. Online safety, mobile technology and artificial intelligence 22
8.1. The four categories of online risk 22
8.2. Our approach 22
8.3. Mobile Phones, Personal Devices and Emerging Technology 23
8.4. Artificial intelligence 23

9. Notifying parents or carers 23
10. Pupils with special educational needs, disabilities or health issues 24
11. Pupils with a social worker 24
12. Looked-after and previously looked-after children 25
13. Pupils who are lesbian, gay, bisexual or gender questioning 25
14. Restrictive interventions and reasonable force 26
15. Alternative provision 26
16. Complaints and concerns about safeguarding practice 27
16.1. Complaints against staff 27
16.2. Other complaints 27
16.3. Whistleblowing 27
17. Record-keeping, monitoring and transfer 27
18. Training 28
18.1. All staff 28
18.2. DSL and deputy DSLs 28
18.3. Staff who have contact with pupils and families in relation to safeguarding and child protection 28
18.4. Trustees and governors 28
18.5. Recruitment panels 29
19. Monitoring arrangements 29
20. Links with other policies 29
Appendix 1: Types and indicators of abuse, neglect and exploitation 31
Appendix 2: Safer recruitment and DBS checks - policy and procedures 33
Appendix 3: Allegations and low-level concerns 35
Appendix 4: Specific safeguarding issues 36
Appendix 5: Referral process 45
Appendix 6: Visitors on site 46
Appendix 7: Prevent duty and radicalisation risk assessment 47
Appendix 8: EYFS use of cameras and mobile phones 50
Version updates: 51

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff understand their statutory responsibilities and the Trust's expectations for safeguarding and child protection.
- Staff, volunteers, governors and trustees are properly trained to recognise, respond to, record and report safeguarding concerns.
- Children are listened to, taken seriously, and supported to report worries in ways that feel accessible to them.
- Safeguarding is embedded through a whole-school culture of vigilance, inclusion, professional curiosity and prompt action.
- Online safety, child-on-child abuse, mental health, attendance, alternative provision, restrictive interventions and emerging risks such as Generative AI are considered through a safeguarding lens.
- We are committed to promoting an inclusive, anti-discriminatory culture in which all children feel safe, respected and valued. As part of our safeguarding practice, we will actively challenge prejudice, discrimination, racism and faith-targeted abuse and respond promptly to any concerns.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education 2026 and Working Together to Safeguard Children. It should also be read alongside local safeguarding partnership procedures and the Trust's related policies.

This policy is also based on, and should be read in conjunction with, the following legislation and guidance:

- Education Act 2002, section 175, and the Education (Independent School Standards) Regulations 2014, including duties on academies to safeguard and promote the welfare of pupils.
- The Children Acts 1989 and 2004.
- Safeguarding Vulnerable Groups Act 2006 and related regulated activity requirements.
- Rehabilitation of Offenders Act 1974 and amendments to the Exceptions Order.
- Female Genital Mutilation Act 2003 and statutory guidance on FGM.
- Counter-Terrorism and Security Act 2015 and the Prevent duty guidance.
- Human Rights Act 1998.
- Equality Act 2010, including the Public Sector Equality Duty and the duty to make reasonable adjustments for disabled pupils.
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025, collectively referred to in this policy as data protection laws.
- Section 3 of the Early Years Foundation Stage statutory framework, where applicable.
- DfE guidance on filtering and monitoring standards, sharing nudes and semi-nudes, searching, screening and confiscation, alternative provision, children with health needs who cannot attend school, and restrictive interventions including reasonable force.

- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

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

3. 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 within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring children grow up in circumstances consistent with safe and effective care;
- taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding and refers to activity undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm, including harm inside or outside the home and online.

Abuse is a form of maltreatment of a child. It may involve inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical and the impact of witnessing ill treatment of others.

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

Children means everyone under the age of 18.

Child-on-child abuse means abuse by one child or group of children against another child or group of children. It can take place inside or outside school, face-to-face, online, or both.

Making or sharing nudes and semi-nudes means the creation, sending or posting of nude or semi-nude images by children under 18. Images include photographs, videos and livestreams. They may be self-generated, taken or created by another person, digitally altered, or wholly generated using artificial intelligence, including deepfakes or deep nudes.

Victim and alleged perpetrator are terms used in national guidance. The school will use terminology carefully and, where appropriate, use language with which the child is comfortable.

Private fostering occurs when a child under 16, or under 18 if disabled, is provided with care and accommodation for 28 days or more by someone who is not a parent, person with parental responsibility, or close relative.

4. Equality statement

Some children have an increased risk of abuse, neglect or exploitation, both online and offline, and additional barriers can exist for some children in recognising or disclosing harm. We are committed to anti-discriminatory practice and recognise children's diverse circumstances.

We give particular consideration to children who:

- have SEND, disabilities, physical health conditions or mental health needs
- are young carers, bereaved, pregnant and/or parents themselves
- are looked after, previously looked after, care leavers, or have or have had a social worker
- are missing education, persistently absent, on part-time timetables, repeatedly removed from classrooms, have experienced multiple suspensions, are in alternative provision or a PRU, or are at risk of permanent exclusion
- may experience discrimination due to race, ethnicity, religion, sex, disability, sexual orientation, gender reassignment or gender questioning
- have English as an additional language, are asylum seekers or from new migrant families
- are living in difficult family circumstances, including substance misuse, adult mental health difficulties, domestic abuse or parental offending
- are at risk of exploitation, modern slavery, trafficking, criminal exploitation, sexual exploitation, forced marriage, FGM or radicalisation into terrorism
- have a parent or carer in custody or are affected by parental offending
- whose parent/carer has expressed an intention to remove them from school to be home educated.

5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers, trustees, governors, supply staff, contractors and visitors. It applies to school, extended school and off-site activities.

The school plays a crucial role in preventative education as part of a whole-school approach to preparing pupils for life in modern Britain. This includes a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia, racism, faith-based prejudice, harassment and violence. This is underpinned by the behaviour policy, pastoral support, RSHE, online safety, curriculum and safeguarding practice.

5.1. All staff

All staff will:

- Read and understand Part one of Keeping Children Safe in Education 2026. All staff, including those who do not work directly with children, must read Part One of KCSIE 2026. There is no longer a shortened Annex A version available. Staff will confirm annually that they have read and understood Part One.
- Complete an annual declaration to confirm that they have read the required statutory guidance and relevant school policies.
- Understand the school's systems that support safeguarding, including this policy, the staff code of conduct, behaviour policy, online safety policy, attendance procedures, the role

and identity of the DSL and deputy DSLs, and how to respond to children who are absent or missing from education.

- Be alert to indicators of abuse, neglect and exploitation, including online harm, domestic abuse, child-on-child abuse, CSE, CCE, serious violence, radicalisation, FGM and mental health concerns that may indicate safeguarding risk.
- Maintain professional curiosity and act immediately where they have concerns, rather than waiting to be told.
- Reassure children who report concerns that they are being taken seriously and will be supported and kept safe.
- Reinforce online safety with pupils and, where appropriate, parents and carers, including what pupils are asked to do online and who they may interact with online.
- Understand that children can be at risk in school, outside school, at home and online, and that multiple needs may exist at the same time.
- Record concerns promptly, accurately and factually, including the date, time, action taken and rationale for decisions.

5.2. The Designated Safeguarding Lead (DSL)

The school DSL is a senior member of the school leadership team. The DSL takes lead responsibility for child protection and wider safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place. The DSL for this school is: Ellen Thompson, Headteacher.

During term time, the DSL will be available during school hours for staff to discuss safeguarding concerns. Out-of-hours and out-of-term arrangements are: dsl@manorfield.embracemat.org When the DSL is absent, deputy DSLs will provide cover: Leanne Jones, Assistant Headteacher, Jaime Webster, Assistant Headteacher and Lauren Roach, Office Manager.

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

- Manage referrals to local authority children's social care, Channel, police, DBS and other bodies where appropriate.
- Act as a source of support, advice and expertise for staff.
- Take part in strategy discussions and inter-agency meetings and contribute to assessments of children.
- Liaise with the headteacher, Trust DSL, local authority, safeguarding partners, LADO, police, social workers, virtual school heads, SENCO, senior mental health lead and other professionals as appropriate.
- Promote educational outcomes for children in need, children with child protection plans, children who have or have had a social worker, looked-after children and previously looked-after children.
- Understand the lasting impact that adversity, trauma, abuse, neglect and exploitation can have on children's attendance, learning, behaviour, mental health and wellbeing.
- Understand the unique risks associated with online safety, including filtering and monitoring, Generative AI, deepfakes, deep nudes, online exploitation, grooming, harmful content, misinformation, disinformation and conspiracy theories.

- Take the lead on child-on-child abuse, harmful sexual behaviour, sexual harassment and sexual violence responses, including risk assessment and support planning.
- Ensure safeguarding records are confidential, secure, up to date, clear and comprehensive, with a rationale for decisions and a chronology where appropriate.
- Transfer child protection files promptly and securely when children move school, including advance information where ongoing support is required.
- Raise awareness of this policy and ensure it is made publicly available.
- Encourage a culture of listening to all children, especially children who may be disproportionately impacted by harm or face barriers to reporting.

The Trust DSL will ensure this policy is reviewed at least annually.

5.3. The Board of Trustees and Local Governing Committees (LGC)

The Board of Trustees will approve this policy at each review and ensure it complies with the law and statutory guidance. The Local Governing Committee will adopt the Trust-approved policy, review school-level additions and hold the headteacher to account for its implementation.

The Board of Trustees and LGC will:

- Ensure safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Ensure all governors and trustees receive safeguarding and child protection training at induction and regular updates appropriate to their strategic challenge role.
- Ensure appropriate filtering and monitoring systems are in place, reviewed at least annually and understood by leaders and staff.
- Ensure procedures are in place for safeguarding concerns and allegations against staff, supply staff, volunteers, contractors and organisations using school premises, including low-level concerns.
- Ensure the school's safeguarding policy reflects barriers and disproportionate vulnerability for children with SEND, medical conditions and other vulnerable groups.
- Seek assurance for providers using school premises and ensure safeguarding requirements are included in lease, hire or transfer of control agreements.
- Receive regular safeguarding assurance regarding incidents, trends and outcomes relating to sexual harassment, sexual violence, harmful sexual behaviour, misogyny, Violence Against Women and Girls (VAWG), online abuse and child-on-child abuse, and ensure appropriate preventative action is taken.
- Ensure any safeguarding deficiencies or weaknesses are addressed without delay.

5.4. The Headteacher

The headteacher will:

- Implement this policy and ensure it is followed by all staff and volunteers.
- Ensure staff and volunteers are informed of safeguarding systems at induction and understand referral procedures.
- Ensure the policy is communicated to parents/carers when their child joins the school and is published on the school website.

- Ensure the DSL has sufficient time, training, funding, resources and support, and that there is always adequate cover.
- Act as case manager for allegations against staff and volunteers, unless the allegation concerns the headteacher.
- Make decisions regarding low-level concerns, in consultation with the DSL or Trust DSL where appropriate.
- Ensure allegations involving individuals or organisations using the school premises are managed in line with this policy and referred to or discussed with the LADO where thresholds are met.
- Ensure EYFS ratios, key person arrangements and safe use of technology, mobile phones and cameras are implemented where applicable.

5.5. Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the attendance, attainment and progress of pupils with a social worker. The DSL will engage with virtual school heads, social workers, SENCOs, mental health leads and other professionals to improve outcomes and reduce safeguarding risk.

6. Confidentiality and information sharing

All matters relating to child protection are confidential. However, staff must never promise confidentiality to a child. Where there is a child protection concern, information will be passed immediately to the DSL and/or local authority children's social care or the police as appropriate.

- Fears about sharing information must not stand in the way of safeguarding and promoting the welfare of children.
- Information will be shared on a need-to-know basis and in accordance with data protection laws: the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.
- Data protection laws do not prevent or limit the sharing of information for safeguarding purposes. Where special category personal data is shared, safeguarding of children and individuals at risk may provide an appropriate processing condition.
- If staff are unsure whether to share information, they should speak to the DSL or deputy DSL. If a child is at risk of harm, immediate action must not be delayed.
- Where sexual harassment, harmful behaviour or violence is reported, the DSL will balance the child's wishes with the duty to protect the child and other children. Parents/carers will normally be informed unless this would increase risk or compromise an investigation.
- The school will follow statutory guidance and local safeguarding partnership procedures on information sharing, referrals, record transfer and escalation.

7. Recognising abuse, neglect and exploitation and taking action

All staff are expected to identify and respond to abuse, neglect, exploitation and emerging risks. Abuse, neglect and exploitation rarely occur in isolation and multiple concerns may overlap.

7.1. Vulnerable Children (including those with Early Help and Child Services support as well as young carers)

Any child may benefit from support before statutory intervention, including universal services, community-based Early Help or the targeted early help level. Staff should be particularly alert to the potential need for additional support for a child who:

- Is disabled, has certain health conditions, SEND or an EHC plan.
- Has a mental health need, is a young carer, is bereaved, is pregnant and/or is a parent.
- Has exhibited early signs of abusive, violent or harmful behaviours.
- Is showing signs of being drawn into anti-social or criminal behaviour, including gangs, organised crime groups, county lines or serious violence.
- Is frequently missing from education, home or care, persistently absent, on a part-time timetable or not receiving full-time education.
- Has been repeatedly removed from classrooms, experienced multiple suspensions, is in alternative provision or a PRU, or is at risk of permanent exclusion.
- Is at risk of exploitation, modern slavery, trafficking, radicalisation into terrorism or so-called honour or faith-based abuse.
- Has a parent or carer in custody or is affected by parental offending.
- Is privately fostered or whose family circumstances present challenges such as domestic abuse, substance misuse or adult mental health difficulties.

The school recognises that young carers may be particularly vulnerable and may require early help, pastoral support and additional safeguarding consideration. Staff should be alert to the impact of caring responsibilities on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

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

- Make an immediate referral to local authority children's social care and/or the police. Anyone can make a referral.
- In Leicestershire, urgent same-day concerns should be referred to First Response: 0116 3050005.
- Tell the DSL as soon as possible if you make a direct referral.
- If there is immediate danger, call 999.

7.3. If a child makes a disclosure

- Listen carefully, remain calm and allow the child time to talk freely.
- Do not ask leading questions, investigate, examine, photograph or promise confidentiality.
- Reassure the child that they have done the right thing in telling you and that they will be supported.
- Explain what will happen next and that the information must be passed to people who can help.

- Write up the concern as soon as possible using the child's own words where possible; include date, time, facts, who was present, actions taken and your signature or secure electronic equivalent.
- Pass the record to the DSL without delay or make a direct referral if immediate action is needed.

7.4. If staff have concerns about a child

- Speak to the DSL to agree a course of action wherever possible.
- If the DSL is unavailable, do not delay action. Speak to a DDSL/senior leader and/or seek advice from children's social care.
- Where an early help assessment is appropriate, the DSL will usually lead liaison with agencies, unless another professional is better placed.
- The DSL will keep the case under review. If the child's situation does not improve, the school will consider referral or escalation in line with local procedures.
- The DSL or referrer must follow up with the local authority if the outcome of a referral is not known and record the outcome.

In Leicestershire, a referral to Early Help can be completed online via the request for services form found under the Early Help section on this page page Report abuse or neglect of a child | Leicestershire County Council.

Referral

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will aim to make a decision within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

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

In Leicestershire, if safeguarding concerns go beyond an Early Help referral but would not be considered a Priority 1, a Multi–Agency Referral Form can be completed via this page Report abuse or neglect of a child | Leicestershire County Council

7.5. FGM

FGM is illegal and a form of child abuse. Teachers have a mandatory duty to report personally to the police where they discover that FGM appears to have been carried out on a girl under 18. Staff must also report concerns to the DSL and follow local safeguarding procedures. Staff must not examine pupils.

7.6. Extremism and radicalisation

Where staff have concerns about a child being susceptible to radicalisation into terrorism, they must speak to the DSL. The DSL will assess risk and consider referral to children's social care, police Prevent team, Channel or other relevant support. In an emergency, staff should call 999.

7.7. Mental health concerns

Mental health problems can be an indicator that a child has suffered or is at risk of abuse, neglect or exploitation. Staff will be alert to changes in behaviour, persistent difficulty sleeping, withdrawal, not wanting to do things the child usually enjoys, self-neglect, self-harm, suicidal ideation or risk of suicide. Where a mental health concern is also a safeguarding concern, staff must follow safeguarding procedures immediately.

7.8. Concerns about a staff member, supply teacher, volunteer, contractor or organisation using school premises

- Concerns or allegations about staff, supply staff, volunteers or contractors must be reported to the headteacher as soon as possible.
- Concerns or allegations about the headteacher must be reported to the Trust Leader as specified in Trust procedures.
- Where there is a conflict of interest, a concern should be reported directly to the Trust Leader or the LADO.
- Where an allegation relates to an individual or organisation using school premises for activities with children, the headteacher will follow school procedures and consult or refer to the LADO where required.
- Low-level concerns must be reported and recorded in line with the Trust Low-Level Concerns Policy.

7.9. Allegations of abuse made against other pupils

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, but this Safeguarding & Child Protection Policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

(See Appendix 4 for more information about child-on-child abuse.)

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

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

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

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

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders, eg sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below).
- Ensure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening. Staff should maintain an attitude of "it could happen here".
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report, for example:
    - Children can show signs or act in ways they hope adults will notice and react to.
    - A friend may make a report.
    - A member of staff may overhear a conversation.
    - A child's behaviour might indicate that something is wrong.
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

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

Disciplinary action can be taken while other investigations are going on, eg by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution. We will liaise with the police and/or local authority children's social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

7.10. Violence Against Women and Girls (VAWG), misogyny and harmful gender-based attitudes

The school recognises that Violence Against Women and Girls (VAWG) is both a societal issue and a safeguarding issue that can impact children and young people directly and indirectly. We acknowledge the significant role that harmful attitudes, discriminatory beliefs, misogyny, sexism, sexual harassment and gender-based abuse can play in creating unsafe environments and increasing the risk of harm to children.

VAWG may include, but is not limited to:

- sexual harassment
- sexual violence

- online sexual abuse
- image-based abuse, including sharing intimate images without consent
- stalking and harassment
- coercive and controlling behaviour
- domestic abuse
- so-called honour-based abuse
- harmful sexual behaviour
- gender-based discrimination, bullying or intimidation.

The school maintains a culture of zero tolerance towards sexual violence, sexual harassment, misogyny, misandry, sexism, discrimination and all forms of abusive behaviour. Such behaviour will never be dismissed as banter, humour, part of growing up or accepted social behaviour.

Staff understand that harmful attitudes and behaviours can exist on a continuum and may begin with seemingly low-level behaviours such as sexist language, gender stereotyping, misogynistic comments, degradation of women and girls, inappropriate sexualised comments, unwanted touching, online abuse or the sharing of harmful content. Early intervention is essential to prevent escalation to more serious incidents of abuse.

The school will actively challenge harmful attitudes, language, behaviour and stereotypes through:

- the curriculum, including Relationships, Sex and Health Education (RSHE)
- behaviour policies and pastoral systems
- safeguarding education
- assemblies and awareness activities
- staff training
- appropriate intervention and support.

The school recognises that girls are statistically more likely to experience certain forms of abuse, including sexual violence, sexual harassment and online abuse. However, safeguarding responses will always consider the individual needs and experiences of all children, regardless of sex, gender identity or background.

Where incidents involving sexual harassment, sexual violence, misogyny, harmful sexual behaviour or gender-based abuse occur, the school will take immediate and proportionate action. Concerns will be recorded, investigated and risk assessed by the DSL. Appropriate support will be provided to those affected, referrals made where necessary, and action taken to reduce the risk of further harm.

Governors and leaders will maintain oversight of incidents, trends and patterns relating to sexual harassment, sexual violence, misogyny, gender-based abuse and harmful sexual behaviours to ensure the effectiveness of safeguarding arrangements and preventative education.

7.11. Sharing of nudes and semi-nudes

Your responsibilities when responding to an incident

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

You must **not**:

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

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

Initial review meeting

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

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

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See Appendix 4 for more information on assessing adult-involved incidents.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN).
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The imagery involves sexual acts, and any pupil in the images or videos is under 13.
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).
- If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If, at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

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

Referring to the police

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

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE curriculum and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is.
- How it is most likely to be encountered.

- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

Pupils also learn the strategies and skills needed to manage:

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

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

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

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

7.12. Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible 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.
- Make it clear to pupils that they can report concerns to any member of staff, this can be through discussion, worry boxes or a note for staff.
- Ensure there are a range of opportunities for pupils to talk confidentially to staff regarding any concerns and support from the ELSA if needed after a disclosure.

7.13. Private Fostering

The school will follow, fully, the statutory guidance Keeping Children Safe in Education 2026 if it suspects that a private fostering arrangement is in place or may come into place:

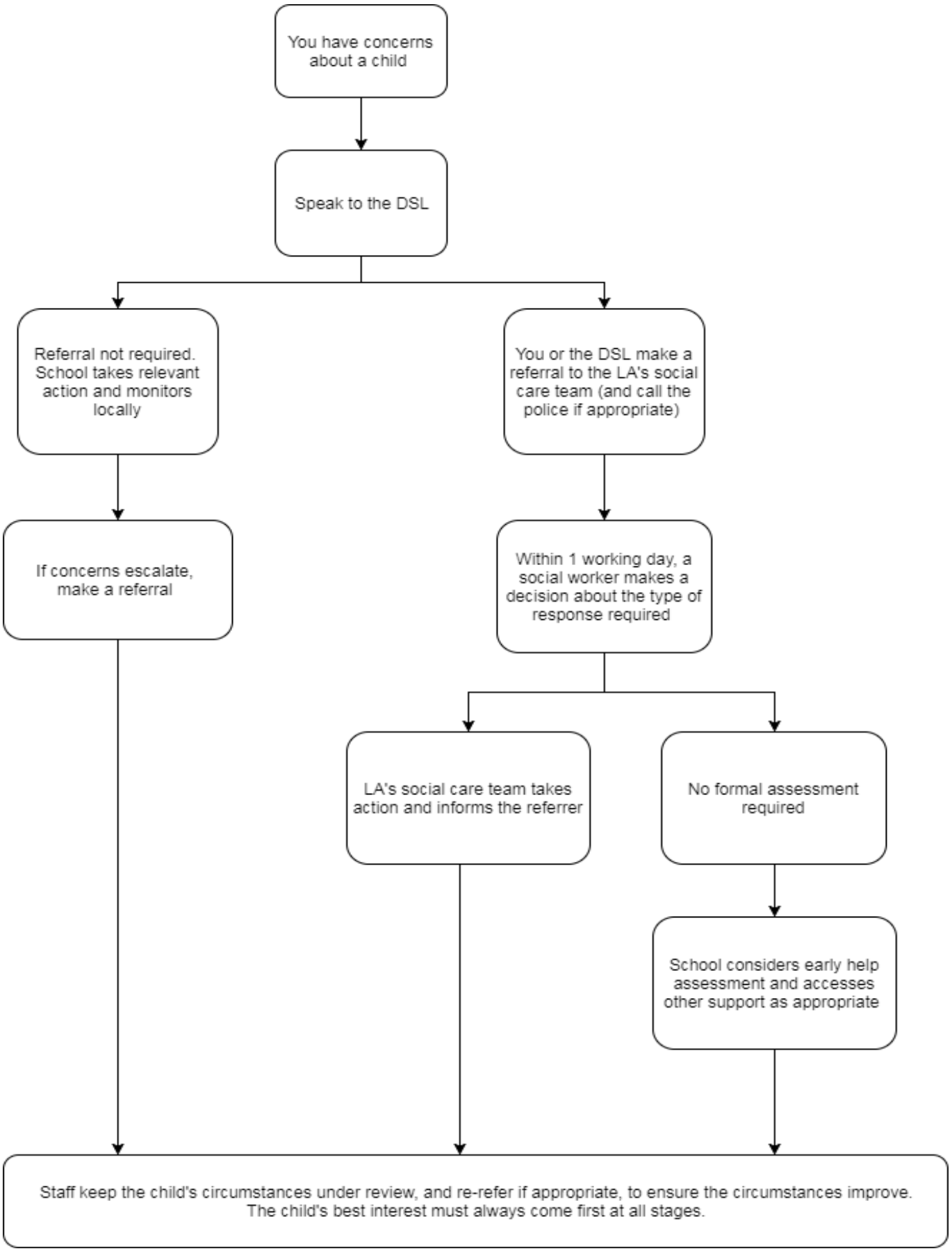
"Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home."

"A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the

attention of school and college staff through the normal course of their interaction, and promotion of learning activities, with children."

"Where the arrangements come to the attention of the school or college (and the school or college is not involved in the arrangements), they should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. Schools and colleges who are involved (whether or not directly) in arranging for a child to be fostered privately must notify local authorities of the arrangement as soon as possible after the arrangement has been made. Notifications must contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and must be made in writing."

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)



8. Online safety, mobile technology and artificial intelligence

Technology is a significant component in many safeguarding and wellbeing issues. Children may be at risk online as well as face-to-face. Online safety is a running and interrelated theme throughout safeguarding, curriculum, behaviour, anti-bullying, attendance, data protection, staff conduct and pastoral support.

8.1. The four categories of online risk

- **Content**: exposure to illegal, inappropriate or harmful content, including pornography, racism, misogyny, misandry, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation, fake news and conspiracy theories.
- **Contact**: harmful online interaction with other users, including peer pressure, commercial advertising and adults posing as children or young adults to groom or exploit children sexually, criminally, financially or otherwise.
- **Conduct**: online behaviour that increases the likelihood of harm, including bullying, harassment, making, sending and receiving explicit images, including images generated or altered by AI, deepfakes and deep nudes.
- **Commerce**: online gambling, inappropriate advertising, phishing, financial scams, money laundering and other financial exploitation.

8.2. Our approach

- Robust filtering and monitoring systems are in place to limit children's exposure to harmful content from school systems.
- The governing body / Trust will review filtering and monitoring effectiveness at least annually and ensure leaders and staff understand responsibilities.
- The DSL, SLT, IT/network staff and all staff have clearly assigned responsibilities for online safety, including reviewing concerns and internet logs where appropriate.
- Pupils are taught online safety through the curriculum, including safe use of social media, personal information, reporting concerns, harmful online challenges, AI, misinformation, deepfakes and respectful online conduct.
- Pupils will receive age-appropriate education about respectful relationships, consent, gender equality, healthy behaviour, online conduct, misogyny, Violence Against Women and Girls (VAWG), harmful sexual behaviour and how to seek help if they experience or witness abuse.
- Parents/carers are supported to understand online safety expectations and how to raise concerns.
- Staff must comply with mobile phone, camera, image, AI and acceptable use policies. Staff must not take images or recordings of pupils on personal devices.
- Pupils, staff, volunteers and governors will be required to follow acceptable use agreements.
- The governing body will seek assurance that mobile phone, online safety, filtering and monitoring arrangements remain effective, proportionate to risk and responsive to emerging technologies, including artificial intelligence, deepfakes and image-based abuse.

8.3. Mobile Phones, Personal Devices and Emerging Technology

The school recognises that smartphones and other internet-enabled devices present both educational opportunities and safeguarding risks. Pupils' use of mobile phones, personal devices and digital platforms will be managed in accordance with the school's behaviour, online safety and mobile phone policies. Staff will be alert to risks associated with the creation, possession, sharing and distribution of images, videos and online content, including content generated or altered using artificial intelligence (AI). This includes AI-generated images, deepfakes, deep nudes, manipulated content, self-generated intimate images and content that may be used to bully, harass, exploit, coerce or harm others. Any concerns regarding the creation, sharing or possession of inappropriate images or content will be treated as a safeguarding concern and managed in accordance with statutory guidance and safeguarding procedures.

8.4. Artificial intelligence

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 and Google Gemini.

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

We will treat any use of AI to access harmful content or bully pupils in line with this policy and our Anti-bullying and Behaviour policy as well as acceptable use of AI. Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education

The school recognises that AI technologies may be used to create realistic but fabricated content, including images, audio and video known as deepfakes. Such content may be used to facilitate bullying, sexual harassment, child-on-child abuse, exploitation, misinformation or reputational harm. Staff will remain vigilant to the risks associated with AI-generated content and will respond promptly to any concerns involving the creation, sharing or possession of AI-generated images, deepfakes, deep nudes or other manipulated media involving children or members of the school community. This will be managed through safeguarding, behaviour and online safety procedures as appropriate.

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, eg moving them out of classes with the victim, and the reason(s) behind any decision(s).

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

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

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

We offer extra pastoral support for these pupils. This includes: support from class teachers, in class support staff and ELSA provision.

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

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

For further information relating to supporting pupils with medical conditions please see the separate policy.

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 DSL and all members of staff will work with and support social workers to help protect vulnerable children.

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

- Responding to unauthorised absence or 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 DSL has details of children's social workers and relevant virtual school heads.

We have appointed a designated teacher, Ellen Thompson, Headteacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

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

13. Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL. Support will be offered to children through class teachers, support staff and our ELSA.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

The DSL will lead in these cases.

14. Restrictive interventions and reasonable force

The school recognises that the use of restrictive interventions, including reasonable force, may in some circumstances constitute a safeguarding concern, particularly where it is frequent, involves pupils with SEND, mental health needs or medical conditions, or gives rise to injury, distress or unmet need.

- Restrictive interventions should only be used as a last resort, for the purpose of maintaining safety, and in line with statutory guidance and the school's restrictive interventions / behaviour policy.
- Reasonable force means using no more force than necessary for the least amount of time. Decisions depend on individual circumstances and professional judgement within the law.
- The school will not adopt a blanket no-contact policy that prevents staff from appropriately supporting and protecting pupils.
- Where risks involve pupils with SEND, medical conditions or mental health needs, staff and leaders will consider additional vulnerability, reasonable adjustments and the Public Sector Equality Duty.
- Positive and proactive behaviour support, individual behaviour plans and agreement with parents/carers will be used where appropriate to reduce the need for force.
- Significant incidents will be recorded. Parents/carers will be informed promptly, normally on the same day.
- The DSL will review relevant incidents and patterns of use through a safeguarding lens.
- Governors/trustees will receive oversight information on restrictive interventions as part of safeguarding monitoring.

15. Alternative provision

Where a pupil is placed with an alternative provision provider, the school remains responsible for safeguarding that pupil and must be satisfied that the placement meets the pupil's needs.

- Before placement, the school will obtain written information from the alternative provider confirming that appropriate safeguarding checks have been completed for individuals working at the provision.
- The provider must confirm in writing that it will notify the commissioning school of any arrangements that may put the child at risk, including relevant staff changes, subcontracted provision or satellite sites.
- The school will carry out its own due diligence and quality assurance and will consider national standards and local authority guidance where available.

- The school will always know where the child is during school hours, including the address of the provider and any subcontracted or satellite sites.
- Attendance at alternative provision will be monitored daily, with first-day absence follow-up in line with the attendance policy.
- Placements will be reviewed at least half-termly, or more frequently where risk or need requires, to assure attendance, safety, suitability and progress.
- Where safeguarding concerns arise, the placement will be immediately reviewed and terminated if necessary unless or until concerns are satisfactorily addressed.

16. Complaints and concerns about safeguarding practice

16.1. Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be managed in accordance with the Trust Allegations of Abuse Policy and Appendix 3 of this policy.

16.2. Other complaints

Safeguarding-related complaints of other types will be handled in line with the Embrace Multi Academy Trust Complaints Policy

16.3. Whistleblowing

Staff who have concerns about the way the school safeguards pupils, including poor or unsafe practice or potential failures, may raise these through the Embrace Multi Academy Trust Whistleblowing Policy or contact the NSPCC whistleblowing helpline.

17. Record-keeping, monitoring and transfer

Well-kept records are essential to effective child protection practice and should evidence professional curiosity, decision-making and the rationale for actions taken.

- All safeguarding concerns, discussions, decisions and the rationale for decisions must be recorded in writing or on the school's secure safeguarding system, such as CPOMS.
- Records must include a clear and comprehensive summary of the concern, how it was followed up and resolved, actions taken, decisions reached and outcomes.
- Child protection records are kept separately from the main pupil file, securely and confidentially, with access restricted to those with a professional need to know.
- Records relating to actual or alleged abuse, neglect or exploitation are stored securely and may be indicated in the main file by a marker only where appropriate.
- Chronologies or case summaries will be maintained for complex or ongoing cases.
- Records will be reviewed regularly to identify patterns, repeated concerns, unmet need, professional drift or further action required.
- When a child transfers school, safeguarding records will be transferred securely, separately from the main pupil file and as soon as possible: within 5 days for an in-year transfer or within the first 5 days of a new term.
- Where concerns are significant, complex or ongoing, the DSL will speak to the receiving DSL in advance where possible so support is in place when the child arrives.

- The school will obtain and retain a record of transfer where possible.
- Safeguarding files will be available for external scrutiny, including audit, inspection, rapid review or regulatory review, where required.

Our school will ensure all our files will be available for external scrutiny, for example by a regulatory agency or because of a rapid review or audit.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

18. Training

18.1. All staff

- All staff will receive safeguarding and child protection training at induction, including whistleblowing, online safety, filtering and monitoring, child-on-child abuse, low-level concerns, staff conduct, attendance, mental health, Prevent and local procedures.
- Training will be regularly updated and aligned with local safeguarding partner advice, statutory guidance, the whole-school safeguarding approach and curriculum planning.
- Staff will receive safeguarding updates at least annually and more frequently where required, for example through staff meetings, briefings, emails or bulletins.
- Contractors and volunteers will receive appropriate safeguarding information or training according to their role and level of contact with children.

18.2. DSL and deputy DSLs

- The DSL and deputy DSLs will undertake child protection and safeguarding training at least every two years and update knowledge and skills at least annually.
- Training will include multi-agency working, child protection conferences, information sharing, managing records, online safety, filtering and monitoring, Generative AI risks, Prevent, mental health, children with SEND and the impact of trauma and adversity.
- The DSL or designated Prevent lead will undertake more in-depth Prevent awareness training, including extremist and terrorist ideologies.

18.3. Staff who have contact with pupils and families in relation to safeguarding and child protection

All staff who have contact with children and families in relation to safeguarding and child protection matters will receive appropriate support, coaching and training, to promote the interests of children and allow for confidential discussions of sensitive issues.

18.4. Trustees and governors

- All trustees and governors will receive safeguarding and child protection training, including online safety, at induction and regularly thereafter.

- Training will equip governors and trustees to provide strategic challenge and assurance that safeguarding policies, procedures and practice are effective.
- The chair or relevant Trust leader who may act as case manager for allegations against the headteacher will receive appropriate training.

18.5. Recruitment panels

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training covering, as a minimum, the content of KCSIE 2026 Part Three and local safeguarding procedures.

19. Monitoring arrangements

This policy will be reviewed annually by the Trust Leader and Trust Safeguarding Lead. At every review it will be approved by the Trust Board. The policy will also be reviewed sooner if statutory guidance, local safeguarding partnership procedures, Trust arrangements or safeguarding practice require amendment.

20. Links with other policies

This policy links to the following Trust and school policies and procedures:

- Acceptable use of IT
- AI Policy
- Allegations of Abuse Policy
- Alternative Provision procedures
- Anti-bullying Policy
- Attendance Policy
- Behaviour Policy
- Complaints Policy
- Designated Teacher for looked-after and previously looked-after children guidance
- Equality Statement
- First aid and Administration of Medicines Policy
- Health and Safety Policy
- Intimate care/toileting procedures
- Low-Level Concerns Policy
- Mobile Phone Policy
- Online Safety Policy
- Privacy notices and data protection procedures
- Recruitment and selection / safer recruitment
- Relationships, Sex and Health Education Policy
- Restrictive interventions / reasonable force guidance
- Staff code of conduct
- Trips and Visits Policy

- Whistleblowing Policy
- Extended school activities and lettings / hire agreements

Appendix 1: Types and indicators of abuse, neglect and exploitation

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

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

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 verbal abuse, such as persistent criticism, belittling, humiliation, rejection or name-calling, as well as 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 from participating in normal social

It may involve seeing, hearing or experiencing the ill treatment of another person, including domestic abuse. It may involve serious bullying (including cyberbullying), 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, although it may occur alone.

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

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

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

Children are more likely to know their abuser than not.

Children under the age of 13 can never legally consent to sexual activity.

Racism, faith-based prejudice and other forms of discrimination are forms of harm in their own right. They can have a significant impact on a child's welfare, wellbeing and sense of safety and should be recognised, recorded and responded to as safeguarding concerns where appropriate.

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment

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

Appendix 2: Safer recruitment and DBS checks - policy and procedures

Recruitment and selection processes follow KCSIE 2026 Part Three and the Trust Safer Recruitment Policy. Safeguarding is considered at every stage of recruitment.

Advertising

- Advertisements will make clear the commitment to safeguarding, the checks required, the safeguarding responsibilities of the role and whether the role is exempt from the Rehabilitation of Offenders Act.

Applications and shortlisting

- Application forms will include safeguarding statements and appropriate declarations. Shortlisting will involve at least two people, consider inconsistencies and gaps, explore potential concerns and include online searches for shortlisted candidates as part of due diligence where appropriate.

References

- References will be obtained before interview wherever possible. Open references will not be accepted. References will be verified with referees and concerns resolved before appointment. The school will provide relevant information in references about substantiated safeguarding concerns. Unsubstantiated, unfounded, false or malicious allegations will not be included.

Pre-appointment checks

- Offers are conditional on satisfactory checks, including identity, right to work, enhanced DBS and barred list where required, mental and physical fitness, qualifications, prohibition from teaching, section 128 for management roles, overseas checks, and childcare disqualification checks where applicable. Identity checks may include birth certificate and evidence relating to previous names where relevant.

Single central record

- Required checks will be recorded on the single central record. Copies of DBS certificates will not be retained for longer than permitted or necessary.

Agency, supply, contractors and volunteers

- The school will obtain written confirmation that required checks have been completed and will verify identity on arrival. Unchecked volunteers will not be left unsupervised or allowed to work in regulated activity.
- Where schools are also subject to the EYFS framework, volunteers must not be permitted to begin working within EYFS provision until the school has received the volunteer's enhanced DBS certificate, including barred list information.

Trustees, members and governors

- Appropriate DBS, identity, right to work and section 128 checks will be completed in line with statutory requirements, the Academy Trust Handbook and Trust procedures.

Alternative provision, work experience and host families

- Written safeguarding assurances will be obtained for AP providers. Work experience providers must have policies and procedures to protect children. Host family arrangements will be risk assessed and checked in line with statutory guidance.

Appendix 3: Allegations and low-level concerns

Detailed procedures are set out in the separate Embrace Multi Academy Trust Allegations of Abuse Policy and Low-Level Concerns Policy.

The following summary must be read alongside those policies:

- Allegations that may meet the harm threshold include where a person working with children has behaved in a way that has harmed or may have harmed a child, possibly committed a criminal offence against or related to a child, behaved towards a child in a way that indicates they may pose a risk of harm, or behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Concerns must be reported immediately to the headteacher, or to the Trust Leader / Chair of Governors where the concern is about the headteacher.
- The headteacher or case manager must contact the LADO on the same day where the threshold is met or advice is needed. Clarification may be sought, but this must not become an investigation before LADO advice.
- Concerns about supply staff, trainee teachers, volunteers, contractors and individuals or organisations hiring the premises are included.
- Low-level concerns are concerns, however small, that an adult may have acted in a way inconsistent with the staff code of conduct, including inappropriate conduct outside work, but which does not meet the harm threshold.
- Staff should self-report situations that could be misinterpreted or where their conduct may have fallen below expected standards.
- Low-level concerns will be recorded, reviewed for patterns and escalated to the LADO where necessary. Governor/trustee oversight will be anonymised and proportionate.
- Low-level concerns will not be included in references unless they have met the threshold for referral to the LADO and been found substantiated.

Appendix 4: Specific safeguarding issues

Child-on-child abuse

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

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that does not mean that this kind of abuse is not 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) and discriminatory behaviour, including racism and faith-targeted abuse.
- 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 do not want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate.

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

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between two children of any age and sex.

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

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

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

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

When supporting victims, staff will:

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

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

The school recognises that carrying, possessing, threatening with or using a weapon is a significant safeguarding concern and may indicate wider risks including serious violence, child criminal exploitation, gang involvement, coercion, intimidation, trauma or vulnerability to harm. Staff should be particularly alert to concerns arising before and after the school day, during journeys to and from school, and in locations where children may be more vulnerable to exploitation, peer conflict or serious violence.

Any concerns regarding a child carrying, possessing, threatening with or using a weapon, or expressing an intention to do so, will be treated as an immediate safeguarding concern and reported to the Designated Safeguarding Lead without delay. The DSL will assess the level of risk, consider the wider safeguarding context, undertake appropriate risk assessments and make referrals to Children's Social Care, the Police or other agencies where necessary.

The school will work with pupils, families and partner agencies to reduce risks and provide appropriate intervention and support.

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.

Child criminal exploitation and child sexual exploitation

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

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

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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.

- Regularly missing school or education.
- Not taking part in education.

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

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

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

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

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

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

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

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

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 is not physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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

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 DSL) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass.

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

So-called honour or faith-based abuse

Racism and faith-targeted abuse can have a significant impact on a child's welfare, wellbeing and sense of safety and should be treated as safeguarding concerns.

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.

Modern slavery and human trafficking

May involve sexual exploitation, forced labour, slavery, servitude, forced criminality or removal of organs. Children may be trafficked into the UK or moved within the country. Indicators may include neglect, isolation, poor living conditions, few belongings, mistrust and reluctance to seek help. The DSL will consider referral to the National Referral Mechanism and children's social care.

FGM

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/pupil already being known to social services in relation to other safeguarding issues.
- A girl:
    - having difficulty walking, sitting or standing, or looking uncomfortable
    - finding it hard to sit still for long periods of time (where this was not a problem previously)
    - spending longer than normal in the bathroom or toilet due to difficulties urinating
    - having frequent urinary, menstrual or stomach problems
    - avoiding physical exercise or 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.

Forced marriage

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

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, ie we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a 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 fmu@fco.gov.uk

- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Children absent from education

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

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

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

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

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

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

Non-collection of children

If a child is not collected at the end of the session/day, we will contact the pupil's contacts in order of priority listed on Bromcom.

Private fostering

Where staff become aware that a private fostering arrangement is in place or planned, they must inform the DSL so the local authority can be notified and assess whether the arrangement is suitable and safe.

Homelessness

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

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

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

Assessing adult-involved nude and semi-nude sharing incidents

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

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

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

Sexually motivated incidents

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

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

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

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

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

Financially motivated incidents

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

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

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

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

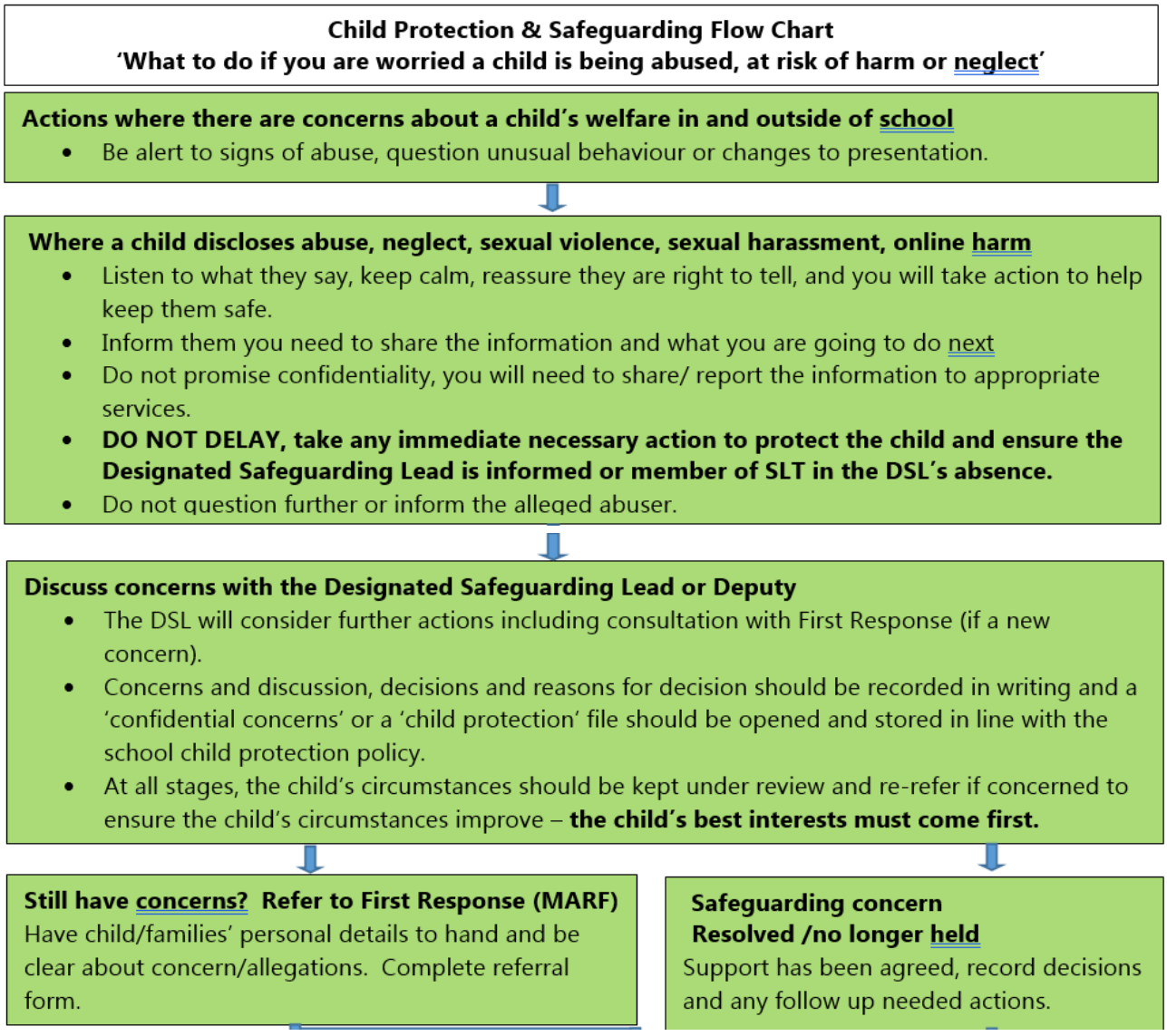
The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

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

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

Appendix 5: Referral process

1. Concern is identified by staff, child, parent/carer, another professional or through observation, attendance, online activity or records.
2. If immediate danger or likely significant harm is identified, contact police and/or local authority children's social care immediately, then inform the DSL.
3. If there is a concern but no immediate danger, record the concern and speak to the DSL as soon as possible.
4. The DSL considers the information, child's wishes and feelings, context, previous concerns, professional advice and local thresholds.
5. The DSL decides whether to provide school support, initiate Early Help, consult professionals, refer to children's social care / police / Channel / LADO / DBS, or escalate existing concerns.
6. Actions, decisions, rationale and outcomes are recorded. The case remains under review until needs are met and risk is reduced.



Appendix 6: Visitors on site

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 in via the iPad and wear a visitor's badge.

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

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

Appendix 7: Prevent duty and radicalisation risk assessment

The school recognises its duty under the Counter-Terrorism and Security Act 2015 to prevent children from becoming involved with or supporting terrorism. The DSL/Prevent lead will assess local risk, work with partners, ensure staff training, maintain records and ensure filtering and monitoring arrangements help reduce risk.

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence.
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**
  - negate or destroy the fundamental rights and freedoms of others; or
  - undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  - intentionally create a permissive environment for others to achieve the results outlined in either of the above points.
- **Terrorism** is an action that:
  - endangers or causes serious violence to a person/people;
  - causes serious damage to property; or
  - seriously interferes or disrupts an electronic system.

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

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

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

We will ensure that suitable internet filtering is in place and equip our 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 radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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.

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

EXAMPLE RADICALISATION RISK ASSESSMENT	Yes/No	Evidence
Does the school have a policy?	Yes	Held within the Embrace Child Protection Policy
Does the school work with outside agencies on radicalisation and extremism, eg Channel?	Yes	
Have staff received appropriate training?	Yes	SLT certificates of relevant CPD
Has the school got a trained Prevent lead?	Yes	
Do staff know who to discuss concerns with? (DSL)	Yes	Evidence in regular CPD, briefings, safeguarding quiz
Is suitable filtering of the internet in place?	Yes	
Do children know who to talk to about their concerns?	Yes	
Are there opportunities for children to learn about radicalisation and extremism?	Yes	Through Jigsaw curriculum
Have any cases been reported?	No	
Are individual pupils risk assessed?	No	This would be used if required.
What factors make the school community potentially vulnerable to being radicalised? (eg, EDL local base, extreme religious views promoted locally, tensions between local communities, promotion of radical websites by some pupils/parents)	The majority of referrals the Prevent Team received relate to Leicester City. Of the Districts, Charnwood, Blaby and Hinckley and Bosworth had the most referrals. This had been the same distribution of referrals for some time. The priorities for the local area are:	

	· Extreme right-wing terrorism; · Online extremism; · Self-initiated terrorists; · Extremist travel; · Prison radicalisation and releases.

Comment on the school's community, locality and relevant history

Stoney Stanton, a village in Leicestershire, lies within the Blaby District, a semi-rural region not far from Hinckley and Leicester. Stoney Stanton has a small but close-knit community, with a strong historical connection to quarrying and agriculture. Over the years, the village has maintained a more traditional, rural character while becoming increasingly integrated with surrounding areas as part of regional development and modernisation.

Community and Locality:

Stoney Stanton is predominantly a residential village with a stable population. Like many rural villages in the UK, it has historically had a strong sense of local identity, with community life centred around churches, schools, local events, and recreational facilities. Despite its rural setting, Stoney Stanton is well-connected to nearby towns and cities, making it part of a wider regional network.

The community in Stoney Stanton has seen some diversification over the years, with people from different ethnic backgrounds moving into the area, although it remains primarily white British. The rural setting, local schools, and community initiatives foster a sense of inclusion and engagement within the village.

Radicalisation Concerns:

Stoney Stanton has not been highlighted as a location with significant radicalisation issues, and the village has a relatively quiet and stable social environment. However, as with other communities in the UK, the risk of radicalisation, while minimal, can still exist, particularly in today's globalised and online world.

The village, like others in Leicestershire, is involved in the UK government's Prevent strategy, which is aimed at preventing individuals from being drawn into extremism or terrorism. The strategy is implemented in schools, local councils, and community organisations across the country, including in more rural areas like Stoney Stanton. The emphasis here would be on fostering community resilience, promoting inclusivity, and educating young people about the risks of extremism.

While the village itself may not have a significant history or direct experience of radicalisation, it is important to note that even rural communities can be affected by broader societal issues, particularly when it comes to online influences and ideological movements.

Relevant History Related to Radicalisation:

Stoney Stanton does not have a notable history connected to radicalisation. Its rural nature and close-knit community have provided a strong foundation for social stability. However, as part of the broader Leicestershire region, it has likely been involved in the same national concerns around extremism that have affected the UK in recent years, whether from Islamist extremism or far-right groups.

Although radicalisation tends to be more associated with urban areas, rural communities like Stoney Stanton are not completely immune. There have been concerns nationally about how online spaces can influence vulnerable individuals, particularly young people, even in isolated or rural areas. The village's local schools and community organisations are involved in safeguarding measures and providing support through education, awareness, and interventions if any risks were identified.

Conclusion: Stoney Stanton, while not a community heavily impacted by radicalisation, remains part of the UK's overall efforts to prevent extremism and maintain social cohesion. The village benefits from a strong sense of community and stability, but, like any community, it must stay vigilant to potential risks, particularly those that stem from online influences. The Prevent strategy and local engagement efforts play a role in ensuring that the community remains resilient to radicalisation threats.		
Risk evaluation	Evaluate as one of: Low; Medium; High	MEDIUM

Appendix 8: EYFS use of cameras and mobile phones

Where the school has early years provision, the following minimum expectations apply, alongside the EYFS statutory framework and the school's online safety, mobile phone and acceptable use policies:

- Personal mobile phones, cameras and recording devices must be stored securely during working hours and outings.
- Mobile phones must not be used in teaching, toilet or changing areas.
- Only school equipment should be used to record classroom activities. Images must be stored on approved school systems and not kept on personal devices.
- During school outings, nominated staff will have access to a school mobile phone for emergencies or contact purposes.
- Contact with parents/carers must normally be through school systems and recorded appropriately.
- Parents/carers may take photographs of their own children at school events, where permitted, but must not publish images of other children on social media or online platforms.

Version updates:

Version	Date	Location	Update
V2	06/10/2026	Contacts	Safeguarding Trustee details changed
V2	06/10/2026	Aims	Added: We are committed to promoting an inclusive, anti-discriminatory culture in which all children feel safe, respected and valued. As part of our safeguarding practice, we will actively challenge prejudice, discrimination, racism and faith-targeted abuse and respond promptly to any concerns
V2	06/10/2026	Appendix 1 - Sexual abuse	Added: the word 'causing' Added: children are more likely to know their abuser than not Added: children under the age of 13 can never legally consent to sexual activity. Added: Racism and faith-targeted abuse can have a significant impact on a child's welfare, wellbeing and sense of safety and should be treated as serious safeguarding concerns.
V2	06/10/2026	Appendix 2	Added: Where schools are also subject to the EYFS framework, volunteers must not be permitted to begin working within EYFS provision until the school has received the volunteer's enhanced DBS certificate, including barred list information.
V2	06/10/2026	Appendix 4 – child on child	Added: discriminatory behaviour, including racism and faith-targeted abuse to bullet 1
V2	06/10/2026	Appendix 4 – so-called honour or faith-based abuse	Added: Racism and faith-targeted abuse can have a significant impact on a child's welfare, wellbeing and sense of safety and should be treated as serious safeguarding concerns.