



Safeguarding Policy

	Name	Role
Reviewed by	Nicola Baker	School Operations Lead
	Laura Eaves	Pastoral Lead
	Sion Hughes	School Business Manager
	Dympna Woods	Executive Headteacher
	Gary Woods	Group Headteacher
	Stuart Howarth	Proprietor
Approved by	Chair of Governors, Proprietor, Executive Head, Headteacher	
Last reviewed	June 2026	
Next review	June 2027	
Statutory basis	KCSIE 2025 Working Together 2026 ISSR 2026	

This policy applies to all sites: Marsh Green | Standish | Holly House (Warrington) | Lancashire

CONTENTS

1	Important Contacts
2	Introduction
3	Aims of the Policy
4	Legislation and Guidance
5	Definitions
6	Equality, Diversity and Inclusion
7	Roles and Responsibilities
8	Confidentiality
9	Recognising Abuse and Taking Actions
10	Online Safety and the use of Mobile Technology
11	Notifying Parents or Carers
12	Pupils with Special Educational Needs, Disabilities or Health Issues
13	Pupils with a Social Worker
14	Looked-After and Previously Looked-After Children
15	Working with Multi-Agencies
16	Complaints and Concerns about School Safeguarding Policies
17	Record Keeping
18	Training and Recruitment
19	Monitoring Arrangements
20	Links with Other Policies
Appendix 1	Types of Abuse
Appendix 2	Safer Recruitment and DBS Checks – Policy and Procedures
Appendix 3	Allegations of Abuse Made Against Staff
Appendix 4	Specific Safeguarding Arrangements

	Out of Hours 01244 977 277 https://earlyhelpandpreventiononline.cheshirewestandchester.gov.uk/web/portal/pages/marfi-ART@cheshirewestandchester.gov.uk	ns-Referral-Form-LADO.docx&wdOrigin=BROWSELINK safeguardinglado@cheshirewestandchester.gov.uk
Bolton	Front Door - 01204 331500 Out of hours 01204 337777 https://www.bolton.gov.uk/safeguarding-protecting-children/reporting-child-abuse/1	01204 337474 www.boltonsafeguardingchildren.org.uk/managing-allegations Lado@bolton.gov.uk
Wigan	Front Door and out of hours.01942 828300 https://childrensportalehm.wigan.gov.uk/web/portal/pages/home	01942 404364 https://www.wigan.gov.uk/Resident/Health-Social-Care/Children-and-young-people/LADO-notification-form.aspx
Oldham	Front Door and out of hours 0161 770 7777 https://www.olscb.org/professionals/referrals/	0161 770 8870 / 0161 770 0008 colette.morris@oldham.gov.uk catherine.leach@oldham.gov.uk https://www.olscb.org/cms-data/depot/hipwig/LADO-Referral-Form.docx https://www.olscb.org/professionals/lado/
Rochdale	Front door and out of hours 0300 303 0440	0300 3030350 lado@rochdale.gov.uk
St Helens	Front Door 01744 676767 Out of hours 0345 050 0148 MASH@sthelens.gov.uk	sthelenslado@sthelens.gov.uk 01744 671252 https://www.sthelenssafeguarding.org.uk/assets/793b8db0/lado_consultation_form_oct_2020.doc https://www.sthelenssafeguarding.org.uk/assets/793b8db0/lado_referral_april_2025.doc
Stockport	Front Door 0161 217 6028 Out of Hours 0161 718 2118 https://forms.stockport.gov.uk/contacting-the-massh/level-select	LADO 0161 474 5657 https://www.stockport.gov.uk/start/contact-the-lado
Lancashire	Front Door 0300 123 6720 Out of hours 0300 123 6722 https://www21.apps.lancashire.gov	01772 536694 tim.booth@lancashire.gov.uk

	<p>v.uk/w/webpage/498GBLSM1?context_record_id=1230921&webpage_token=a764a5ccc9525cd4d4bc54f46162a0b46ae03dd7985b8855</p> <p>53fd8e539d831ed1&expiry=dn4mRNm36MukN3OEVIftuYUL</p>	
Bury	<p>Front Door 0161 253 5678</p> <p>Out of Hours 0161 253 6606</p> <p>https://burymbc-self.achieveservice.com/AchieveForms/?&consentMessage=yes&form_uri=sandbox-publish://AF-efed4ada-428b-427d-ad45-a62cf6aef70d/AF-Stage-db859343-4cfc-4183-af28-853aa6443416/definition.json&process=1&process_uri=sandbox-processes://AF-Process-efed4ada-428b-427d-ad45-a62cf6aef70d&process_id=AF-efed4ada-428b-427d-ad45-a62cf6aef70d&fromURL=/social-care-and-support/child-care-and-support/report-a-child-at-risk&domain=www.bury.gov.uk</p>	<p>0161 253 6168</p> <p>lado@bury.gov.uk</p> <p>https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fburysafeguardingpartnership.bury.gov.uk%2Fasset-library%2Flado-referral-form.docx&wdOrigin=BROWSELINK</p>
Trafford	<p>Front Door 0161 912 5125</p> <p>Out of Hours 0161 912 2020</p>	<p>0161 912 5125</p> <p>https://trafford-framework.egovhub.net/ALLEGATIONOFPROFESSIONALABUSE/launch</p>
Manchester	<p>Front Door and Out of Hours 0161 234 5001</p> <p>mcsreply@manchester.gov.uk</p>	<p>0161 234 1214</p> <p>https://www.manchestersafeguardingpartnership.co.uk/allegations-against-professionals-lado/</p> <p>LADO@manchester.gov.uk</p> <p>quality.assurance@manchester.gov.uk</p>
Tameside	<p>Front Door 0161 342 4101</p> <p>Out of hours 0161 342 2222</p> <p>https://secure.tameside.gov.uk/forms/mars/f1312mars.asp</p>	<p>https://secure.tameside.gov.uk/forms/mars/f1312mars.asp</p> <p>0161 342 4398</p>
Police	<p>999</p> <p>101</p>	

	Inset own local community police contact	
NSPCC	0808 8005 000 https://www.nspcc.org.uk/	
Childline	0800 1111 https://www.childline.org.uk	
Channel Helpline	020 7340 7264	
Prevent	National resource https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/protecting-children-from-radicalisation/ Local see LA contact details and follow safeguarding routines	
ParentPlus Helpline	8002 222	

2. INTRODUCTION

This policy has been developed to ensure that all adults with Infinite Schools are working together to safeguard and promote the welfare of children and young people.

This policy describes the management systems and arrangements in place to create and maintain a safe learning environment for all children, young people and staff. It identifies actions that should be taken to redress any concerns about child welfare.

The Designated Safeguarding Lead for Infinite Schools or, in their absence, the authorised member of staff, has the ultimate responsibility for safeguarding and promoting the welfare of children and young people. This policy is relevant to our other policies; Anti Bullying, E-Safety and Behaviour.

Infinite Schools Whole School Safeguarding Culture

Infinite Schools is committed to fostering a strong safeguarding culture in which the safety, welfare and wellbeing of every child are embedded throughout all aspects of school life. Safeguarding is everyone's responsibility and is promoted through effective leadership, clear policies, high-quality training, a safeguarding curriculum and an environment in which pupils feel safe to speak about their worries and concerns.

The school will:

- Promote a culture where safeguarding is understood to be the responsibility of all staff, volunteers, governors and visitors.
- Ensure that safeguarding remains central to leadership decision-making, strategic planning and school improvement.
- Provide regular safeguarding training, updates and professional development for all staff.
- Deliver an age-appropriate curriculum that equips pupils with the knowledge, skills and confidence to recognise risks, seek help and keep themselves safe.
- Encourage an open and transparent reporting culture in which safeguarding concerns can be raised promptly without fear of criticism or reprisal.
- Regularly evaluate safeguarding practice through audits, monitoring, pupil voice, staff feedback and governance oversight to ensure continuous improvement.

Trauma-Informed Practice

Infinite Schools recognises that adverse childhood experiences, trauma and significant life events may affect a child's emotional wellbeing, behaviour, relationships and ability to engage in learning. The school adopts a trauma-informed approach that seeks to understand the possible impact of trauma whilst maintaining high expectations, clear professional boundaries and robust safeguarding procedures.

The school will:

- Promote a compassionate and trauma-informed approach that seeks to understand the reasons behind behaviour whilst maintaining appropriate professional boundaries.
- Recognise that behaviour may be a form of communication and that emotional distress may present in different ways.
- Ensure that responses to behaviour take account of children's individual circumstances whilst maintaining consistent expectations and safeguarding standards.
- Provide staff with appropriate training to recognise the impact of trauma, attachment difficulties and adverse childhood experiences on children's development and learning.

- Work collaboratively with parents, carers and external professionals to provide coordinated support where trauma or significant adversity has been identified.
- Ensure that a trauma-informed approach complements, and does not replace, statutory safeguarding responsibilities, with concerns always reported and managed in accordance with the school's safeguarding procedures.

2. AIMS OF THE POLICY

The school aims to ensure that:

1. Appropriate action is taken in a timely manner to safeguard and promote children's welfare
2. All staff are aware of their statutory responsibilities with respect to safeguarding
3. Staff are properly trained in recognising safeguarding issues
4. Infinite Schools aim to create and maintain a safe environment where all children and adults feel safe, secure and valued and know they will be listened to and taken seriously. Our organisation implements policies, practices and procedures which promote safeguarding and the emotional and physical well-being of children, young people and staff.
5. The Continuum of Needs and Response and the Common Assessment Framework is embedded into everyday practice and procedures when responding to children's needs. The children have access to appropriate curriculum opportunities, including emotional health and well-being, to support the development of the skills needed to help them stay safe and healthy, develop their self-esteem and understand the responsibilities of adult life.
6. Every safeguarding concern starts with the child's wishes, feelings and lived experiences at the centre. Children should know that they can always talk to staff within our schools, where they will be listened to and never made to feel blame. Children's voices will be taken seriously.

3. LEGISLATION AND STATUTORY GUIDANCE

Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance *Keeping Children Safe in Education (2023)* and *Working Together to Safeguard Children (2018)*, and the *Governance Handbook*. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

1. Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
2. [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
3. Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
4. [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
5. Section 5B(11) of the [Female Genital Mutilation Act 2003](#), as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
6. [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
7. [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
8. Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
9. Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and

Key Legislative Framework and Updates (Academic Year 2025/26)

This policy is underpinned by the latest statutory guidance and national safeguarding expectations, including:

1. **Keeping Children Safe in Education (KCSIE) 2025**
2. **Working Together to Safeguard Children 2025**
3. **Children and Social Work Act 2017**
4. **Education Act 2002**
5. **Children Missing from Education 2025**
6. **The Equality Act 2010**
7. **The Human Rights Act 1998**
8. **Prevent Duty Guidance 2023**
9. **The Education (Independent School Standards) Regulations 2025 (as amended)**

2025/26 Updates and Priorities:

- All staff must read and understand Part 1 of KCSIE 2025, and those working directly with children must also be familiar with Part 5 (Child-on-Child Sexual Violence and Harassment). Leadership and DSLs must read the entire document.
- Digital safeguarding risks are now explicitly referenced, including the use of Artificial Intelligence (AI), harmful online algorithms, and the role of school leaders in setting protective boundaries in digital learning environments.
- Whistleblowing, low-level concerns, and staff conduct remain critical safeguarding levers, with updated expectations around how concerns are logged, investigated, and escalated internally or externally.
- Contextual and multi-agency safeguarding is reinforced, requiring schools to consider local safeguarding partnerships, police, social care, and NHS involvement holistically.
- Mental health and wellbeing are now statutory considerations in relation to safeguarding. Schools must be able to demonstrate how pupil and staff wellbeing links directly to early help and safeguarding action.
- Infinite Schools ensures this policy is fully compliant with the above framework, and staff responsibilities are clearly outlined, including training, reporting, and professional conduct expectations. This policy is reviewed at least annually and updated immediately following any national statutory change.

4. DEFINITIONS

Safeguarding and promoting the welfare of children means:

1. Protecting children from maltreatment
2. Preventing impairment of children's mental and physical health or development
3. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
4. Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

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

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

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams or computer-generated imagery.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

5. The local authority (LA)
6. An integrated care boards (clinical commissioning group) for an area within the LA
7. The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Vulnerable Groups include SEND, Looked After Children, Previously Looked After, Young carers, LGBTQ+ children, children with mental health needs, children in temporary accommodation, refugees, asylum seekers, children with social workers.

5. EQUALITY, DIVERSITY AND INCLUSION

Infinite Schools recognises that safeguarding practice must be inclusive and equitable, ensuring that every child receives appropriate protection regardless of their individual circumstances or protected characteristics. Some children may experience additional barriers to recognising abuse, seeking help or disclosing concerns, and safeguarding arrangements must reflect these differences.

The school will:

- Ensure that safeguarding practice is inclusive and takes account of children's individual needs, experiences, identities and protected characteristics.
- Recognise that children with Special Educational Needs and Disabilities (SEND), children who are looked after, young carers, children with social workers, children from minority ethnic communities, refugees, asylum seekers and other vulnerable groups may face additional safeguarding risks or barriers to disclosure.
- Make reasonable adjustments to communication, support and safeguarding procedures where required to enable children to express their views and access appropriate protection.
- Promote an inclusive environment where all children feel respected, valued and safe to report concerns.
- Challenge discriminatory behaviour, prejudice, bullying and harassment promptly and effectively.
- Ensure safeguarding decisions are made fairly, without bias or discrimination, and are always centered on the individual needs and best interests of the child.

Some children have an increased risk of abuse both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-

discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

1. Have special educational needs (SEN) or disabilities or health conditions (see section 10)
2. Are young carers
3. May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
4. Have English as an additional language
5. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
6. Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
7. Are asylum seekers
8. Are at risk due to own or a family members mental health needs
9. Are looked after or previously looked after (see section 12)
10. Are missing or absent from education for prolonged periods and/or repeat occasions
11. Whose parent/carer has expressed an intention to remove them from school to be home educated

6. ROLES AND RESPONSIBILITIES

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

Infinite Schools plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.

This will be underpinned by our:

1. Behaviour policy
2. Pastoral support system
3. Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 1. Healthy and respectful relationships
 2. Boundaries and consent
 3. Stereotyping, prejudice and equality
 4. Body confidence and self-esteem
 5. How to recognise an abusive relationship (including coercive and controlling behaviour)
6. The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
7. What constitutes sexual harassment and sexual violence and why they're always unacceptable procedures also apply to extended school and off-site activities.

1. All staff

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education 2025](#), and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g., sites they need to visit or who they'll be interacting with online)

- All staff will be aware of online safety, which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- Be aware of updated behaviour and attendance policies and guidance which impact on safeguarding. All staff will be aware of:
 - Our systems which support safeguarding, including this child protection and safeguarding policy, the staff behaviour policy/code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies, the behaviour policy, and the safeguarding response to children who go missing from education
 - The early help process (sometimes known as the common assessment framework) and their role in it include identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
 - The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
 - What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
 - The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
 - The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
 - The importance of being professionally curious and seeking to answer questions of uncertainty for clarity and clarification.
 - Complete annual training to ensure they are aware of the most recent updates and current knowledge is refreshed.

Professional Curiosity

Infinite Schools recognises that safeguarding children requires staff to remain professionally curious, alert and responsive to changes in behaviour, presentation and family circumstances. Staff should not make assumptions or accept explanations without appropriate consideration where safeguarding concerns may exist.

All staff will:

- Maintain professional curiosity by asking appropriate questions, seeking clarification and exploring concerns where a child's presentation, behaviour or circumstances give cause for concern.
- Recognise that safeguarding concerns may develop gradually and that patterns of behaviour, attendance, disclosures or family circumstances may indicate increased vulnerability.
- Share concerns promptly with the Designated Safeguarding Lead (DSL), even where individual concerns appear minor or uncertain.
- Record factual observations accurately and objectively without making assumptions or attempting to investigate concerns independently.
- Remain vigilant to indicators of abuse, neglect, exploitation, radicalisation, child-on-child abuse and other safeguarding risks.

- Demonstrate respectful professional challenge where concerns remain unresolved, ensuring that the welfare of the child remains paramount.

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

2. The designated safeguarding lead (DSL)

The DSLs are members of the senior leadership team. Our DSLs are Dympna Woods, Gary Woods and Laura Eaves. The DSL's take lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSLs will be available during school hours for staff to discuss any safeguarding concerns. When the DSLs are absent, the deputies/centre DSLs – will act as cover all DSL team members are trained to Level 3.

Safeguarding Team

Name	Designated Area	Contact No.	Email Address
Dympna Woods	Executive Headteacher - DSL	01942 410529 Or 01257 877 872 07858468073 out of hours	Dympna.Woods@infiniteschools.co.uk
Gary Woods	Group Headteacher	01942 410529 Or 01257 877 872	Gary.Woods@infiniteschools.co.uk
Laura Eaves	Pastoral Lead - DSL	01942 410529 Or 01257 877 872	Laura.Eaves@infiniteschools.co.uk
Amanda Travers	Head of School	01942 410529 Or 01257 877 872	Amanda.travers@infiniteschools.co.uk

A rota of senior staff is available to cover any education provision, during out-of-hours/out-of-term activities. The DSLs will be given the time, funding, training, resources and support to:

- Assess safeguarding concerns and make timely referrals to Children's Social Care, the Police, the Local Authority Designated Officer (LADO), Channel, the Disclosure and Barring Service (DBS), or other relevant agencies where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.
- Will identify children and families who may benefit from Early Help, coordinate appropriate support, contribute to Early Help Assessments where required, and work collaboratively with external agencies to prevent concerns from escalating.
- Will act as the primary point of contact for Children's Social Care and other safeguarding partners, ensuring effective communication, information sharing, attendance at multi-agency meetings, and implementation of agreed safeguarding plans to support children and their families.
- Will ensure that all safeguarding concerns, disclosures, referrals, decisions and actions are accurately recorded, securely stored, kept confidential, and transferred appropriately when a child moves to another educational setting, in accordance with data protection legislation and local safeguarding procedures.
- Will provide advice, guidance and support to all staff regarding safeguarding concerns, reporting procedures, risk assessment and appropriate responses to disclosures, ensuring staff understand their responsibilities and act in accordance with statutory guidance.
- Will participate in appropriate safeguarding supervision and reflective practice to support effective decision-making, maintain professional resilience, review complex cases, and ensure safeguarding practice remains child-centred and of a consistently high standard.
- Will regularly monitor and analyse safeguarding data, including referrals, attendance, behaviour, bullying, exclusions, child-on-child abuse and welfare concerns, in order to identify emerging trends, evaluate the effectiveness of safeguarding arrangements, and inform strategic planning, staff training and preventative interventions.
- Will work with senior leaders, governors and IT staff to ensure that appropriate filtering and monitoring systems are in place, regularly reviewed and effective in safeguarding children from harmful or inappropriate online content, while ensuring concerns identified through monitoring are responded to promptly and appropriately.
- Will recognise and respond to safeguarding risks that occur beyond the family home, including within peer groups, schools, online environments and the wider community, ensuring that contextual risks such as exploitation, serious violence, gang involvement and harmful peer relationships are identified, assessed and addressed through multi-agency working where appropriate.
- Will work closely with attendance leads to monitor persistent and severe absence, identify safeguarding concerns linked to poor attendance or children missing education, and ensure appropriate interventions, referrals and multi-agency support are implemented to reduce risk and promote regular school attendance.
- Will ensure that staff are able to recognise the indicators of child sexual exploitation (CSE), child criminal exploitation (CCE), county lines activity, trafficking, modern slavery, online exploitation and other forms of abuse, and will coordinate appropriate safeguarding responses, risk assessments and referrals to protect children from exploitation. The DSLs will also keep the executive headteachers informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSLs and Head of schools /Deputies are set out in their job description.

3. The Executive Headteacher and Headteacher

The executive headteachers are responsible for the implementation of this policy, including:

- Will promote and maintain a strong safeguarding culture throughout the school, ensuring that the welfare of children is at the centre of all decision-making, that safeguarding is understood to be everyone's responsibility, and that pupils feel safe, valued and able to raise concerns.
- Will ensure that all staff receive appropriate safeguarding induction, supervision, support and ongoing professional development to enable them to fulfil their safeguarding responsibilities confidently and effectively, and that safeguarding concerns are discussed and addressed appropriately.
- Will oversee the quality assurance of safeguarding practice by monitoring the implementation of safeguarding procedures, reviewing safeguarding records and audits, evaluating the effectiveness of policies and procedures, and ensuring that any identified areas for improvement are addressed promptly.
- Will ensure that appropriate safeguarding referrals are made promptly to Children's Social Care, the Police, the Local Authority Designated Officer (LADO), the Disclosure and Barring Service (DBS), Channel, or other relevant agencies where there are concerns about the safety or welfare of a child, or where allegations are made against members of staff or volunteers.
- Will ensure that all safeguarding and child protection policies, procedures and statutory guidance are implemented consistently across the school, monitored regularly for effectiveness, and understood and followed by all staff, volunteers and governors through appropriate communication, training and leadership.

4. The governing board

The governing board will:

- Provide strategic oversight of safeguarding arrangements by monitoring the effectiveness of safeguarding practice, receiving regular safeguarding reports from the Headteacher and Designated Safeguarding Lead (DSL), scrutinising safeguarding data and ensuring that safeguarding remains a standing item within governance activities.
- Will ensure that safeguarding and child protection policies and procedures are reviewed at least annually, or sooner where statutory guidance or legislation changes, and that they remain fully compliant with current Department for Education (DfE) requirements and local safeguarding partnership procedures.
- Will ensure that the school allocates sufficient financial, staffing and operational resources to enable effective safeguarding arrangements, including appropriate staffing levels, safeguarding training, secure record-keeping systems, online safety measures and access to specialist support where required.
- Will ensure that robust safer recruitment procedures are implemented and monitored, including the maintenance of an accurate Single Central Record, completion of all required pre-employment checks, appropriate recruitment training for those involved in appointments, and compliance with statutory safer recruitment guidance.
- Will ensure that the Designated Safeguarding Lead (DSL) and any Deputy DSLs receive appropriate safeguarding training at least every two years, undertake regular safeguarding updates to maintain their knowledge and skills, and are provided with sufficient time, funding, supervision and resources to carry out their safeguarding responsibilities effectively. The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, executive headteachers or headteachers, where appropriate.

All governors will read Keeping Children Safe in Education 2025 in its entirety, and an ongoing referral document is available for use and Safeguarding is a standing agenda item at meetings.

Section 15 of this policy has information on how governors are supported to fulfil their role.

Report: Priorities for 2025/2026 are:

1. Peer on Peer abuse
2. Gang and Knife Crime
3. Child Criminal Exploitation/Abuse
4. Domestic Violence
5. Radicalisation and Prevent
6. RSE Curriculum
7. Online Safety and legal processes
8. Filtering and Monitoring
9. Artificial Intelligence

These issues are reflected in our ongoing training offer.

How this is shared:

Regular training updates, staff communication and individual line management and training programs. All training and communication are logged on our Single Central Register

5. Virtual school heads

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

They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

7. CONFIDENTIALITY

Staff ensure that confidentiality protocols are followed, and information is shared appropriately. The Proprietors or Designated Member of Staff discloses any information about a pupil to other members of staff on a need-to-know basis only.

All staff and volunteers must understand that they have a professional responsibility to share information with other agencies to safeguard children. All staff and volunteers must be clear with children of their duty to report and action. Key principles include.

1. Timely information sharing is essential to effective safeguarding
2. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
3. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
4. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
5. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
6. If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

The DSL should consider that:

1. Parents or carers should normally be informed (unless this would put the victim at greater risk)

2. The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
3. Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

7. Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

10. RECOGNISING ABUSE AND TAKING ACTION

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

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

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

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

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

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly. <https://www.gov.uk/report-child-abuse-to-local-council>

See above summary contact table with telephone numbers and emails for each of our Local Authority areas.

2. If a child makes a disclosure to you

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

1. Listen to and believe them. Allow them time to talk freely and do not ask leading questions
2. Stay calm and do not show that you are shocked or upset
3. Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
4. Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
5. Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
6. Sign and date the write-up and pass it on to the DSL and log on CPOMS system. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

3. If you discover that FGM has taken place, or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

4. If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

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

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

Early help assessment

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

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

Each Local authority has a designated early help and mash procedure, and head of schools will follow these in each centre area.

Reason for concern and Early Help Assessment may include:

- attendance issues – as outlined in the Attendance Policy
- family stress
- housing concerns
- domestic abuse
- parental mental health
- substance misuse
- emotional wellbeing
- emerging behavioural difficulties

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 make a decision within 1 working day of the referral about the 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 has improved.

If you have concerns about extremism

If the child is not suffering or likely to suffer from harm, or in immediate danger, where possible to speak to the DSL first to agree to a course of action. If, in exceptional circumstances, the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior

leadership team, and / or seek advice from the local authority children's social care. Make a referral to local authority's children's social care directly, if appropriate (see 'referral' above). Inform the DSL or Deputy DSL as soon as you are practically able after the referral.

Where there is concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals a risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

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

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

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

1. If you have a mental health concern

We have an important role play to support the mental health and wellbeing of our students. Negative experiences and distressing life events can affect the mental health of children and their parents. This can include, for example, being fearful or withdrawn; aggressive or oppositional; or excessive clinginess.

We have members of staff on site daily to address any concerns regarding a child or member of staff's mental health concerns. With the access we have to external agencies we are able to signpost these concerns to ensure they are dealt with by a trained professional.

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

We have existing referral pathways into CAMHS and Healthy Young Minds particular to each Local Authority Area. Department for Education guidance on [mental health and behaviour in schools](#) for more information.

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

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

The executive headteachers/proprietor will then follow the procedures set out in appendix 3, if appropriate.

If the concerns/allegations are about the executive headteachers, speak to the Proprietor / Chair of Governors and the local authority designated officer (LADO).

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the executive headteachers, report it directly to the local authority designated officer (LADO).

If the school receives an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, you should follow your safeguarding policies and procedures and inform the local authority designated officer (LADO), as you would with any safeguarding allegation.

3. Allegations of abuse made against other pupils

We recognise that children are capable of abusing other children or young peoples. 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 child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

1. Is serious, and potentially a criminal offence
2. Could put pupils in the school at risk
3. Is violent
4. Involves pupils being forced to use drugs or alcohol
5. 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
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between children, including requesting or sending sexual images –
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (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:

1. How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
2. 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”
3. 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:
 1. Children can show signs or act in ways they hope adults will notice and react to
 2. A friend may make a report
 3. A member of staff may overhear a conversation
 4. A child’s behaviour might indicate that something is wrong
4. That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
5. That a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
6. 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
7. That they should speak to the DSL if they have any concerns
8. That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent 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:

6. Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this
7. 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

4. Sharing of nudes and semi-nudes (‘sexting’)

Your responsibilities when responding to an incident

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

You must **not**:

1. 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)
2. Delete the imagery or ask the pupil to delete it
3. Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)

4. Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
5. 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:

6. Whether there is an immediate risk to pupil(s)
7. If a referral needs to be made to the police and/or children's social care
8. 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)
9. What further information is required to decide on the best response
10. Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
11. Whether immediate action should be taken to delete or remove images or videos from devices or online services
12. Any relevant facts about the pupils involved which would influence risk assessment.
13. If there is a need to contact another school, college, setting or individual
14. Whether to contact parents or 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:

15. 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
16. 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)
17. 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
18. The imagery involves sexual acts and any pupil in the images or videos is under 13
19. 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 DSL and usual local contact centres or police pathways.

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 14 of this policy also apply to recording these incidents.

Curriculum coverage

All children have access to an appropriate curriculum, differentiated to meet their needs. This enables them to learn to develop the necessary skills to build self-esteem, respect others, defend those in need, resolve conflict without resorting to violence, question and challenge and to make informed choices in later life.

Children and young people are encouraged to express and discuss their ideas, thoughts and feelings through a variety of activities and have access to a range of cultural opportunities which promote respect and empathy for others. There is access to information and materials from a diversity of sources which promote social, spiritual and moral well-being and physical and mental health.

Personal Health and Social Education and Citizenship lessons will provide opportunities for children and young people to discuss and debate a range of subjects including lifestyles, forced marriage, family patterns, religious beliefs and practices and human rights issues.

All children/young people will know that there are adults within Infinite Schools whom they can approach in confidence if they are in difficulty or feeling worried and that their concerns will be taken seriously and treated with respect.

Teaching covers the following in relation to the sharing of nudes and semi-nudes:

20. What it is
21. How it is most likely to be encountered
22. 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
23. Issues of legality
24. The risk of damage to people's feelings and reputation Pupils also learn the strategies and skills needed to manage:
25. Specific requests or pressure to provide (or forward) such images
26. 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.

27. What it is
28. How it is most likely to be encountered
29. 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
30. Issues of legality
31. The risk of damage to people's feelings and reputation Pupils also learn the strategies and skills needed to manage:
32. Specific requests or pressure to provide (or forward) such images
33. 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:

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

5. 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:

1. Put systems in place for pupils to confidently report abuse
2. Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils. CPOMS is used for clear and time lined recording and review.
3. Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
4. Students can speak with any member of staff and are aware of CPOMS recording procedures and supportive escalation pathways. This is discussed in pupil reviews, start of year inductions and via PSHE lessons.
5. Students will be kept informed of any actions and support via key worker and centre manager.
6. Incorporating transparency around the procedures we use to keep everyone safe via our daily form reviews.

11. ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY

Please see the Staff Handbook regarding staff usage.

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

To address this, our school aims to:

1. We have a school wide ban on student mobiles within premises, and these are handed into reception each day and returned when a student leaves the provision.
2. Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
3. Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
4. Set clear guidelines for the use of mobile phones for the whole school community
5. Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
6. Information about our filtering and monitoring systems is detailed in the appendix at the end of this policy entitled Online, Filtering and Monitoring Procedures.

The 4 key categories of risk

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

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

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

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

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

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

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

1. The safe use of social media, the internet and technology
2. Keeping personal information private
3. How to recognise unacceptable behaviour online
4. How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
5. Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
6. Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regard to the use of their mobile phone and cameras, for example that:

1. Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
2. Staff will not take pictures or recordings of pupils on their personal phones or cameras
3. Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
4. Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
5. Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
6. Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
7. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
8. Review the child protection and safeguarding policy, including online safety, annually, and to make sure the procedures and implementation are reviewed regularly via previous risk assessments and asset management.

Filtering and Monitoring

Infinite Schools recognises that effective filtering and monitoring systems form an essential part of a whole-school approach to online safeguarding. Appropriate technical controls, combined with education and staff vigilance, help reduce children's exposure to harmful online content whilst supporting safe and responsible use of digital technologies.

The school will:

- Maintain appropriate filtering and monitoring systems that comply with current statutory guidance and effectively safeguard children whilst accessing the internet.
- Ensure that filtering and monitoring arrangements are regularly reviewed, tested and evaluated by senior leaders, the Designated Safeguarding Lead (DSL), governors and IT providers where appropriate.
- Clearly define safeguarding responsibilities for filtering and monitoring within leadership, governance and technical support roles.
- Ensure that safeguarding concerns identified through monitoring systems are responded to promptly, proportionately and in accordance with safeguarding procedures.
- Regularly review emerging online risks to ensure filtering systems remain effective and responsive to changing technologies and patterns of online harm.
- Educate pupils about safe online behaviour, recognising that filtering systems complement, but do not replace, effective online safety education.

Artificial Intelligence (AI)

Infinite Schools recognises the increasing use of Artificial Intelligence (AI) technologies within education and society. Whilst AI can provide valuable opportunities to enhance teaching, learning and administrative practice, it also presents safeguarding risks that must be appropriately managed. The school is committed to promoting the safe, ethical and responsible use of AI by staff and pupils, ensuring that emerging technologies are used in a manner that protects children from harm and supports their wellbeing.

The school will:

- Promote the safe, ethical and age-appropriate use of Artificial Intelligence (AI) within teaching, learning and administrative practice.
- Ensure that staff and pupils understand the safeguarding risks associated with AI, including AI-generated images, deepfakes, impersonation, misinformation, disinformation and manipulated digital content.
- Educate pupils to critically evaluate AI-generated information and recognise unreliable, misleading or harmful content encountered online.
- Provide staff with appropriate training on the opportunities, limitations and safeguarding implications of AI technologies.
- Ensure that AI tools used within the school comply with safeguarding, data protection and privacy requirements and are subject to appropriate risk assessment before implementation.
- Prohibit the use of AI to create, share or distribute harmful, abusive, discriminatory or inappropriate content.
- Monitor emerging technologies and review school procedures regularly to ensure that safeguarding arrangements remain responsive to new and developing AI-related risks.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policies and Filtering and Monitoring policy.

12. NOTIFYING PARENTS AND 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 the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

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):

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

13. 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:

1. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
2. Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
3. The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
4. Communication barriers and difficulties in managing or reporting these challenges
5. 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: Communication pathways, key worker support.

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

Case management by our Senco of all emerging needs and a multiagency approach to child centred responses and planning.

14. 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:

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

15. 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:

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

We have appointed an appropriately trained teacher, [Kirsty Hodgeon], to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

1. 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
3. Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

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

The section of KCSIE 2025 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

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. Add details of the pastoral support you offer these pupils, such as appointing an LGBTQ+ pastoral lead.

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.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

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

16. MULTI-PROFESSIONAL WORKING

Infinite Schools recognises that effective safeguarding is underpinned by strong partnership working with other professionals and agencies. Safeguarding is a shared responsibility, and no single agency can have a full understanding of a child's circumstances. We are committed to working collaboratively with relevant agencies to promote the welfare of children, identify concerns at the earliest opportunity, and ensure that children and families receive the appropriate support and protection.

The Designated Safeguarding Lead (DSL), Deputy DSLs, Headteacher and other appropriate members of staff will establish and maintain effective professional relationships with safeguarding partners and will work proactively with external agencies in accordance with statutory guidance and local safeguarding partnership procedures.

Infinite Schools will:

- Work collaboratively with **Children's Social Care** to make timely referrals, contribute to assessments, implement child protection and Child in Need plans, and support statutory interventions where required.
- Liaise with the **Police** where concerns relate to criminal offences, child protection investigations, exploitation, missing children, domestic abuse, or immediate safeguarding risks.
- Work in partnership with **health professionals**, including GPs, paediatricians, health visitors and other specialist services, to share relevant information that supports the safeguarding, health and wellbeing of children.
- Engage with **School Nursing Services** to support children with identified health, emotional wellbeing and safeguarding needs, and contribute to joint planning where appropriate.
- Work closely with **Child and Adolescent Mental Health Services (CAMHS)** and other mental health providers to ensure that children experiencing emotional or mental health difficulties receive timely assessment, intervention and ongoing support.
- Collaborate with the **Local Authority** and safeguarding partners to ensure compliance with statutory safeguarding responsibilities, access professional advice, participate in safeguarding audits and implement local safeguarding procedures.
- Liaise with the **Virtual School** to promote the educational achievement, attendance, wellbeing and safeguarding of children who are looked after and previously looked after.
- Work with **Youth Justice Services** where appropriate to support children who are involved with, or at risk of entering, the youth justice system, ensuring safeguarding concerns are addressed alongside any offending behaviour.
- Engage with **Early Help**, family support services, parenting programmes, domestic abuse services, substance misuse services and other voluntary or statutory organisations to provide coordinated support for children and families before concerns escalate.

As part of our commitment to effective multi-agency working, the DSL or an appropriate representative will:

- Attend and contribute to **Child Protection Conferences**, Core Group meetings and Child Protection Review Conferences, providing accurate and timely information to support safeguarding decision-making.
- Participate in **Strategy Meetings** and discussions with Children's Social Care, the Police and other agencies where there are concerns that a child is suffering, or is likely to suffer, significant harm.
- Attend and contribute to **Team Around the Family (TAF)** meetings, supporting coordinated Early Help interventions and reviewing progress against agreed outcomes.
- Participate in **Child in Need (CIN)** meetings and reviews, ensuring the school contributes effectively to the assessment, planning and ongoing support of children subject to Child in Need plans.
- Share information lawfully, proportionately and without unnecessary delay where it is necessary to safeguard or promote the welfare of a child, in accordance with the UK General Data

Protection Regulation (UK GDPR), the Data Protection Act 2018 and statutory information-sharing guidance.

- Maintain accurate, secure and confidential records of all multi-agency communications, meetings, referrals and actions, ensuring that agreed outcomes are implemented, monitored and reviewed.
- Challenge professionally, where appropriate, if there are concerns that safeguarding decisions or interventions are not effectively meeting the needs of a child, always ensuring that the child's welfare remains paramount.

17. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING POLICIES

1. Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

2. Other complaints

Any concern or expression of disquiet made by a child or young person will be listened to seriously and acted upon as quickly as possible to safeguard his or her welfare.

We will make sure that the child or adult who has expressed the concern or made the complaint will be informed not only about the action to be taken but also where possible about the length of time required to resolve the complaint. We will endeavour to keep the child or adult informed about the progress of the complaint/expression of concern.

3. Whistle-blowing

We will follow the whistle blowing protocol as agreed by the school proprietor and Governors and policy.

18. RECORD KEEPING

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

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

Records will include:

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

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

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

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

4. **5 days** for an in-year transfer, or within
5. **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

6. Records are stored electronically on our Sims/Arbour and CPOMS systems
7. We have secure cloud storage for general files, and this is backed up.
8. We follow all data principles and have a data protection officer from an educational law firm who manages our audits, storage and review.
9. We will follow all statutory guidance for file storage and retention
10. We have levels of access and sharing in place for appropriate staff.

Information will only be shared via formal request, referral or GDPR routes and all sharing is pre checked with HY Education.

In addition:

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

19. TRAINING AND RECRUITMENT

All staff

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

This training will be regularly updated and will:

3. Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
4. Be in line with advice from the 3 safeguarding partners
5. Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
6. Have regard to the Teachers' Standards to support the expectation that all teachers:
 1. Manage behaviour effectively to ensure a good and safe environment
 2. Have a clear understanding of the needs of all pupils

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

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

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

The DSLs and [head of schools/deputies]

The DSLs and head of schools/deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

Governors

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

7. Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
8. Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the executive headteachers, they receive training in managing allegations for this purpose.

Recruitment – Interview panels

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education 2025, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

Staff who have contact with pupils and families

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

20. MONITORING ARRANGEMENTS

This policy will be reviewed **annually** by DSL and Executive Headteachers. At every review, it will be approved by the full governing board.

21. LINKS WITH OTHER POLICIES

This policy links to the following policies and procedures:

1. Behaviour
2. Staff behaviour/code of conduct
3. Complaints
4. Health and safety
5. Attendance
6. Online safety
7. Mobile phone use
8. Equality
9. Relationships and sex education
10. First aid
11. Curriculum
12. Designated teacher for looked-after and previously looked-after children

13. Privacy notices
14. Whistleblowing
15. Alternative Providers

APPENDIX ONE – TYPES OF ABUSE

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

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

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

Emotional abuse may involve:

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

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

21. 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
22. Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

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

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

APPENDIX TWO – SAFER RECRUITMENT AND DBS CHECKS – POLICY AND PROCEDURES

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2025.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

27. Our school's commitment to safeguarding and promoting the welfare of children
28. That safeguarding checks will be undertaken
29. The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
30. Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

31. Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
32. Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

33. Consider any inconsistencies and look for gaps in employment and reasons given for them
34. Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

35. Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they can have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 36. If they have a criminal history
 37. Whether they are included on the barred list
 38. Whether they are prohibited from teaching
 39. Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 40. Any relevant overseas information
41. Shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process and be asked to support this.
42. Sign a declaration confirming the information they have provided is true

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

43. Not accept open references
44. Liaise directly with referees and verify any information contained within references with the referees
 45. Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the executive headteachers/principal as accurate in respect to disciplinary investigations
 46. Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
 47. Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
 48. Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
49. Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

50. Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
51. Explore any potential areas of concern to determine the candidate's suitability to work with children
52. Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

53. Verify their identity
54. Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
55. Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
56. Verify their mental and physical fitness to carry out their work responsibilities
57. Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
58. Verify their professional qualifications, as appropriate
59. Ensure they are not subject to a prohibition order if they are employed to be a teacher
60. Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
 61. For all staff, including teaching positions: criminal records checks for overseas applicants
 62. For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
 63. Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, executive headteachers, head of schools and deputy/assistant headteachers.

Regulated activity means a person who will be:

1. Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
2. Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
3. Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

4. There are concerns about an existing member of staff's suitability to work with children; or
5. An individual moves from a post that is not regulated activity to one that is; or
6. There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

7. We believe the individual has engaged in relevant conduct; or
8. We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
9. We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
10. The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

11. An enhanced DBS check with barred list information for contractors engaging in regulated activity
12. An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

13. Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
14. Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
15. Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Governors

All schools include:

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state. All proprietors, trustees, local governors and members will also have the following checks:

16. A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [
17. Identity
18. Right to work in the UK
19. Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

APPENDIX THREE – ALLEGATIONS OF ABUSE MADE AGAINST STAFF INCLUDING LOW LEVEL CONCERNS

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor or sublet party, has:

20. Behaved in a way that has harmed a child, or may have harmed a child, and/or
21. Possibly committed a criminal offence against or related to a child, and/or
22. Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
23. Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the executive headteachers, or the chair of governors or proprietor where the executive headteachers are the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

The school will follow safeguarding procedures and inform the LADO if there's an allegation of an incident happening while an individual or organisation is using the school premises to run activities for children

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

24. Redeployment within the school so that the individual does not have direct contact with the child or children concerned
25. Providing an assistant to be present when the individual has contact with children
26. Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
27. Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
28. Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the school in another site.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

29. **Substantiated:** there is sufficient evidence to prove the allegation
30. **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
31. **False:** there is sufficient evidence to disprove the allegation
32. **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
33. **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

34. Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
35. Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
36. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
37. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
38. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
39. **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
40. **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
41. **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
42. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. A named pastoral support and communication link will be put in place for the individual. External support will be proportioned if required.
43. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against

teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

44. Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
45. Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

46. We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
47. The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
48. We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
49. We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

50. Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
51. If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
52. If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

53. Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
54. Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

55. Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
56. Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

57. Who needs to know about the allegation and what information can be shared
58. How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
59. What, if any, information can be reasonably given to the wider community to reduce speculation
60. How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

61. A clear and comprehensive summary of the allegation
62. Details of how the allegation was followed up and resolved
63. Notes of any action taken, decisions reached and the outcome
64. A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

65. Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
66. Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

67. Issues arising from the decision to suspend the member of staff
68. The duration of the suspension
69. Whether or not the suspension was justified
70. The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

71. Suspicion

72. Complaint
73. Disclosure made by a child, parent or other adult within or outside the school
74. Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

75. Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
76. Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

77. Being overly friendly with children
78. Having favourites
79. Taking photographs of children on their mobile phone
80. Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
81. Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

82. Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
83. Empowering staff to share any low-level concerns as per section 7.7 of this policy
84. Empowering staff to self-refer
85. Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
86. Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
87. Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the executive headteachers will collect evidence where necessary by speaking:

88. Directly to the person who raised the concern, unless it has been raised anonymously
89. To the individual involved and any witnesses

The executive headteachers will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's [staff behaviour policy/code of conduct].

Keeping Children Safe in Education also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)]

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

90. Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
91. Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
92. Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

93. The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
94. The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

APPENDIX FOUR – SPECIFIC SAFEGUARDING ISSUES

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:

95. Contacted by an online account that they do not know but appears to be another child or young person
96. Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
97. Moved from a public to a private/E2EE platform
98. Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
99. Offered something of value such as money or gaming credits
100. 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 to:

95. Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
96. Use images that have been stolen from the child or young person taken through hacking their account
97. 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:

5. 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
6. Quickly engaged in sexually explicit communications which may include the offender sharing an image first
7. Moved from a public to a private/E2EE platform
8. Pressured into taking nudes or semi-nudes
9. Told they have been hacked and they have access to their images, personal information and contacts
10. Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from Education

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

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

1. Are at risk of harm or neglect
2. Are at risk of forced marriage or FGM
3. Come from Gypsy, Roma, or Traveller families
4. Come from the families of service personnel
5. Go missing or run away from home or care
6. Are supervised by the youth justice system
7. Cease to attend a school
8. 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 missing, such as travelling to conflict zones, FGM and forced marriage. It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used

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

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

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

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

Child sexual exploitation

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

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

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

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

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

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

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

Child-on-child abuse

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

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

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

20. Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
21. Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
22. 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)
23. 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)
24. Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
25. 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
26. Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
27. 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
28. Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

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

Domestic abuse

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

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

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

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

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass – we have dedicated mailbox monitored daily for encompass emails.

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

Homelessness

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

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

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

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

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

legs Potential signs that a pupil may be at risk of FGM

include:

15. The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
16. FGM being known to be practised in the girl's community or country of origin
17. A parent or family member expressing concern that FGM may be carried out
18. A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
19. A girl:

20. Having a mother, older sibling or cousin who has undergone FGM
21. Having limited level of integration within UK society
22. Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
23. 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
24. Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
25. 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)
26. Being unexpectedly absent from school
27. 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.

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

If a member of staff suspects that a 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:

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

Preventing Radicalisation

32. **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
33. **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 1. Negate or destroy the fundamental rights and freedoms of others; or
 2. Undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights; or
 3. Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
34. **Terrorism** is an action that:
 35. Endangers or causes serious violence to a person/people;
 36. Causes serious damage to property; or
 37. Seriously interferes or disrupts an electronic system

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

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

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

We will ensure that suitable internet filtering is in place, and equip our 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:

38. Refusal to engage with, or becoming abusive to, peers who are different from themselves
39. Becoming susceptible to conspiracy theories and feelings of persecution
40. Changes in friendship groups and appearance
41. Rejecting activities they used to enjoy
42. Converting to a new religion
43. Isolating themselves from family and friends
44. Talking as if from a scripted speech
45. An unwillingness or inability to discuss their views
46. A sudden disrespectful attitude towards others
47. Increased levels of anger
48. Increased secretiveness, especially around internet use
49. Expressions of sympathy for extremist ideologies and groups, or justification of their actions
50. Accessing extremist material online, including on Facebook or Twitter
51. Possessing extremist literature
52. 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.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including [curriculum policy, behaviour policy, online/e-safety policy].

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them

- Regularly review decisions and actions, and update policies with lessons learnt
 - Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
 - Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
 - Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and

7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

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

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

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

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

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

Checking the identity and suitability of visitors

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

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

Visitors are expected to sign the visitors' book 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

All other visitors, including visiting speakers, will be always accompanied by a member of staff. 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.

Non-collection of children

If a child is not collected at the end of the session/day, we will: use established family emergency contacts and local procedures

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

1. Refer to and follow guidance in the Children Missing from Education Policy

Attendance and Exclusions

In accordance with Infinite Schools's Attendance Policy, absences are rigorously pursued and recorded. The setting, in partnership with the appropriate agencies, takes action to pursue and address all unauthorised absences in order to safeguard the welfare of children and young people in its care.

The Attendance Policy identifies how individual cases are managed, and how we work proactively with parents to ensure that they understand why attendance is important. In certain cases, this may form or equivalent to Early Help Interventions (Chapter 1 Working Together to Safeguard Children 2025) or a Parenting Contract.

The designated person will be informed when exclusion is being discussed, and any safeguarding issues will be considered. Where it is felt that a child or young person is likely to be permanently excluded, we will work with other agencies to ensure that there is improved understanding of the needs of the young person and their family and that the key agencies are involved.