

Part of the Branches Education Group



SAFEGUARDING AND CHILD PROTECTION POLICY



Approved By	Rebecca Warhurst	Head Teacher	March 2026
Amendments Made	See Below		
Linked Policies	<ul style="list-style-type: none">• Staff Code of Conduct• Recruitment and Selection of Staff• Managing Allegations Against Staff, (including procedures for managing Low Level Concerns)• Whistleblowing Policy• Complaints Procedure• Anti-Bullying Policy• Behaviour, Rewards and Sanctions Policy• Data Protection• Online Safety		
Signed	<i>R Warhurst</i>	Head Teacher	March 2026
	<i>L De-Nayes</i>	Governance Chair	March 2026

Date Next Review	March 2027		

Date	Section	Amendment
19.12.25	1.5 Roles and Responsibilities for Safeguarding	Paragraph added to section a) The Proprietary Board - The school will conduct an annual safeguarding audit in line with KCSiE, reporting the findings and any required actions to governors to ensure continuous improvement.
19.12.25	1.1 Introduction	Paragraph added - All staff must read Part 1 of KCSiE (or Annex A) on induction and annually, with DSLs, senior leaders, and governors reading the sections relevant to their roles.
19.12.25	6.12 Alternative Provisions (AP)	Paragraph added - The school requires written confirmation of safeguarding arrangements from AP providers and conducts regular review visits to ensure ongoing compliance and pupil safety.
31.3.26	6.7 Recording and Reporting Restrictive Interventions	Updated following the Department for Education (DfE) consultation on the use of reasonable force and other restrictive interventions, new regulations and statutory duties apply to all schools in England from 1 April 2026.

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1.0 INTRODUCTION, DEFINITIONS and KEY ROLES

1.1 Introduction

Branches Education Group are committed to the safety and protection of all children and young people living in our homes or attending one of our schools. A primary focus is on providing a safe and caring environment in which children and young people can develop socially, emotionally and academically, safe from fear and harm.

This policy is one of a series of documents and policies relating to safeguarding, including:

- Staff Code of Conduct
- Recruitment and Selection of Staff
- Managing Allegations Against Staff, (including procedures for managing Low Level Concerns)
- Whistleblowing Policy
- Complaints Procedure

- Anti-Bullying Policy
- Behaviour, Rewards and Sanctions Policy
- Data Protection
- Online Safety

Every member of staff within Branches Education Group has a shared responsibility for safeguarding and there are specific roles in relation to safeguarding children at our school.

Safeguarding is a golden thread, permeating through all aspects of life at The Willows School and as such, it is *everyone's* responsibility. Our school forms part of a broader system of safeguarding and protection for children. Our approach is child-centred, which means that:

- our safeguarding procedures consider the wishes, feelings and best interests of children
- we seek to give children a 'voice', listen to what they say, take them seriously and work collaboratively with others to meet their needs

Our school aims to provide a positive, stimulating, caring and safe environment, which promotes the social, emotional, physical and moral development of each pupil. We work hard to maintain an ethos and strong culture of safeguarding so that children feel safe and can be safe both at school, and on the way to and from school.

Where a pupil is educated off-site, including in any alternative provision, we as a school continue to be responsible for the safeguarding of that pupil.

This policy applies to everyone in our school and must be read alongside policies and documents listed above.

All staff, including volunteers and temporary staff, are required to read Part 1 of Keeping Children Safe in Education (KCSiE), or Annex A where appropriate, as part of their induction and as part of annual safeguarding updates. The school will ensure that this requirement is recorded and monitored. The Designated Safeguarding Lead (DSL), deputy DSLs, senior leaders, and governors will read and understand the sections of KCSiE that are relevant to their specific roles and responsibilities to ensure effective safeguarding oversight and leadership.

1.2 Definitions

Child(ren) means everyone under the age of 18 years.

Statutory guidance 'Working Together to Safeguard Children' (2024) defines safeguarding and promoting the welfare of children as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, inside or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Safeguarding includes child protection but is also much broader than this. All staff are aware of our school's collective responsibility to act to protect children from potential sources and types of harm, including:

- physical, sexual, emotional abuse, neglect and exploitation
- bullying, online bullying or prejudice-based bullying
- racist, homophobic, transphobic or disability related abuse
- gender-based violence/ violence against women and girls
- sexual violence and sexual harassment
- radicalisation and/ or extremist behaviour
- child sexual exploitation

- criminal exploitation
- modern slavery/ human trafficking
- gang involvement and youth violence
- the impact of new technologies on sexual behaviour, e.g. sharing nude or semi-nudes
- substance misuse
- home based violence/ domestic abuse
- so-called 'honour-based' abuse, including female genital mutilation, forced marriage, breast ironing/ flattening
- perplexing presentations (PP)/ fabricated or induced illness (FII)
- poor parenting, particularly in relation to babies and young children

1.3 Framework Underpinning this Policy

This policy and procedures have been written and will be implemented in-line with the safeguarding and child protection procedures established by Lancashire County Council as part of the local Children's Safeguarding Assurance Partnership (CSAP).

It is also written in accordance with legislation established by the Children Acts 1989 and 2004, the Education Act 2002, Safeguarding Vulnerable Groups Act 2006, The Education (Independent Schools Standards) (England) Regulations 2003, and other core legislation and guidance [See Section 7.0 References].

1.4 Named staff who have specific responsibility for Child Protection

Designated Safeguarding Lead: Rebecca Warhurst

Deputy Designated Safeguarding Lead:

Training for Designated Staff in the school - DSLs refresh their training every two years (KCSiE 2024):

Rebecca Warhurst completed training provided by High Speed Training on 4th January 2024

1.5 Roles and Responsibilities for Safeguarding

Schools have a responsibility to provide a safe environment in which children can learn. All staff, including volunteers, have a responsibility to act to safeguard and promote children's welfare. School staff have no investigative role where child protection is concerned; this is a matter for children's social care and the police.

People with specific safeguarding responsibilities

a) The Proprietary Board

The Proprietors and Board of Directors take seriously their responsibility under Section 11 of the Children Act 2004 and Section 157 of the Education Act 2002. The Proprietors monitor compliance with statutory requirements and identify areas for improvement. The Designated Safeguarding Lead will prepare a

safeguarding report to the Proprietors, which will be discussed at regular half-termly governance meetings. Discussions will be recorded, and any agreed action documented and followed up formally and immediately.

In addition to half-termly safeguarding reports to governors, the school will undertake an annual safeguarding audit in line with Keeping Children Safe in Education (KCSiE). The outcomes of this audit will be formally reported to the governing body and will include a review of safeguarding policies, procedures, training, record keeping, and statutory compliance. Any actions identified will be recorded, monitored, and reviewed to ensure continuous improvement in safeguarding practice.

The Proprietor is: Branches Education Group **Chair:** Edward Smethurst

The Chair of the School Governance Board is: Louise De-Hayes

The Group Lead/ Director responsible for Safeguarding is: Paula Harris, Director of Education

b) The Headteacher

- will ensure that the policies and procedures adopted by the Proprietors and Board of Directors, particularly concerning referrals of cases of suspected abuse, neglect and exploitation, are fully implemented and followed by all staff
- be the Case Manager and liaise with the Local Authority Designated Officer (LADO) in the event of allegations of abuse being made against a member of staff or volunteer
- where a staff member's conduct or behaviour does not meet threshold of an allegation or is not in accordance with the Guidance for Safer Working Practice or Staff Code of Conduct, will manage the process in line with the procedures for managing Low Level Concern
- ensure that a member of staff is appointed as the Deputy DSL in the school and that there is always cover for the DSL as required
- ensure that the DSLs access appropriate training which is regularly updated in-line with statutory and the Local Safeguarding Partnership guidance
- ensure that sufficient resources and time are allocated to enable staff to discharge their responsibilities
- refer cases to the DBS where an allegation is substantiated, and the person is dismissed or resigns or the employer ceases to use their person's services. This is a legal requirement
- lead in such a way as to create an environment and culture that is open, honest and transparent, where all staff and volunteers feel empowered to raise concerns about poor or unsafe practice and will address any concerns sensitively, effectively and in a timely manner.

c) Designated Safeguarding Lead (DSL) and Deputy DSL

The DSL and Deputy DSL undertake training and refresher training in-line with statutory requirements in order to ensure that they have the knowledge and skills required to carry out the role. This will include completing refresher training every two years and additional training, reading or attendance at DSL meetings as required.

The DSL role is described in Keeping Children Safe in Education 2024, Part Two and Annex C.

In Summary, DSLs will:

- refer cases of suspected abuse to children's social care as required
- support staff who make referrals to children's social care
- refer cases to the Channel programme where there is a radicalisation concern and/ or support staff who make referrals to the Channel programme
- refer cases to the police, where a crime may have been committed

- liaise with the designated Director to inform him or her of safeguarding and child protection issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and any police investigations. This will include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the statutory guidance PACE Code C 2019
- liaise with staff, including teachers and support staff on matters of safety, welfare and safeguarding, including online and digital safety, when deciding whether to make a referral, by liaising with relevant agencies so that a child's needs can be considered holistically
- where safeguarding concerns are linked to mental health, liaise with relevant clinicians allocated to the school or pupils, and where appropriate, the external senior mental health lead and where available the mental health support team
- act as a source of support, advice and expertise for all staff
- as required, liaise with the "case manager" referred to in Part Four of KCSiE 2024 and the designated officer(s) at Lancashire local authority (LADO) for child protection concerns in cases which concern a staff member
- promote supportive relationships and engagement with parents and/ or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with Directors and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the school. This includes:
 - ensuring school staff know which children have or have had a Social Worker are
 - understanding their academic progress and attainment
 - maintaining a culture of high aspirations for this cohort; and,
 - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker to reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- ensure appropriate representation at and contributions to multi-agency safeguarding meetings by our school, including the provision of written reports in line with the Local Safeguarding Children's Assurance Partnership guidance and templates
- ensure compliance with best practice and statutory guidance in respect of safeguarding record keeping and the seeking and passing on of relevant information when children join or leave our school. This includes written acknowledgement of receipt from receiving schools/ professionals
- keep records of concerns, discussions and decisions, ensuring they, as DSL, keep records of the rationale for any decisions made
- consider and where appropriate, share information with the receiving school or college in advance of the child attending, to enable support to be in place upon arrival at the new setting
- ensure that they understand the unique risks associated with online safety and have the relevant knowledge and up to date capability required to keep children safe whilst they are online at the school.

Meetings the DSL would attend

Our DSL will attend and contribute to multi-agency meetings convened by statutory organisations, whether this is Children's Social Care, the Police, Health or Youth Offending Team. They will ensure where required under the Safeguarding Partnership procedures that they compile and produce a written report that is in accordance with the Safeguarding Partnership procedures. Meetings will include:

- Initial Child Protection Conference (ICPC)
- Review Child Protection Conference (RCPC)
- Core Group
- Strategy meetings

- Planning Meetings
- Care Planning Meeting
- Child in Need
- Complex Abuse Meetings.

Attendance at meetings will be recorded in the child's safeguarding file, together with notes of meeting, within two working days of the meeting occurring.

1.6 Availability of the DSL

During school hours in term time, the DSL or Deputy DSL will be available in person, for staff to discuss any safeguarding concerns. Where exceptional circumstances means that this is not possible, they will be available via telephone and TEAMS. For any out of hours or out of term time activities, the DSL will ensure that there are adequate and appropriate cover arrangements in place.

1.7 Transfer of Child Protection Files

When a child leaves our school, the DSL will transfer the Child Protection file to the DSL at the new school, college or education setting as soon as possible. This will be within five working days for an in-year/ during term time transfer or within the first five working days of a new term starting. Prior to the Child Protection file being transferred, the DSL will check that the child is actually on roll at the new school where the information will be transferred to.

The DSL will ensure that:

- a file transfer summary form is completed
- the file is taken separately to the new school/ college, separate from the main pupil file
- a signed receipt is obtained, with printed name and role of the person accepting the file
- if the file cannot be hand delivered, the file will be placed in a double envelope and marked clearly as 'strictly confidential', addressed to the named person at that school/ college who is the Designated Safeguarding Lead and posted by recorded delivery, which is signed for and provides a receipt.

The DSL will consider if it is appropriate to share any information with the DSL at the new school or college, in advance of the child leaving. This might help to ensure the right support is in place to safeguard the child and to ensure they can make a smooth transition to their new school or college. For example, information that would allow the new school or college to continue supporting children who have had a Social Worker and have been the victims of abuse, so that there is continued support in place when the child arrives.

1.8 Children Who are Potentially at Greater Risk of Harm

We recognise that all children should be protected in our school, however some groups of children are potentially at greater risk of harm. At The Willows School, we recognise that all pupils on roll are at greater risk of harm due to their additional needs.

Children may need a Social Worker due to safeguarding or welfare needs (Child Protection Plans and Child in Need) and may need this help due to abuse, neglect or complex family circumstances. We recognise that children's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educational disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

It is expected that Children's Social Care (CSC) will make the DSL aware that a child has a Social Worker. When a child comes onto the roll of our school, the DSL will ring CSC in the child's home area and make enquires as to

whether the child is currently open to CSC. The DSL will also contact the DSL at the previous school, to establish if the child has a CP file (if not already sent). Where there is a file, the DSL will request that it is sent in line with the transfer timescales specified within KCSiE 2024 and will also make enquires of that DSL as to whether there is any information that the DSL needs to know in order to either participate in multi-agency meetings, to keep the child safe or in order to support the child in school.

Where safeguarding/ child protection concerns are such that a referral is required to be made, the DSL or Deputy DSL will follow the procedures as laid out in this policy. Where there are children who need a Social Worker, this will inform any decisions we as a school make in relation to safeguarding concerns (e.g. considering the provision of additional pastoral or academic support, alongside action by statutory services).

Alongside any intervention by statutory services, our school will robustly follow up on any unauthorised absence from school, children missing from education and continue to support the child both pastorally and academically, liaising with the clinicians or other agencies as appropriate.

2.0 IF YOU ARE WORRIED ABOUT A CHILD

2.1 Actions to Take if You are Worried about a Child

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. To fulfil this responsibility effectively, all staff will ensure that their approach is child centred. This means that they will consider what is in the best interests of the child at all times.

Everyone will follow the **Lancashire/ Children's Safeguarding Assurance Partnership Procedures**:

<https://www.lancashire.gov.uk/children-education-families/keeping-children-safe/tell-us-if-you-are-worried-about-a-child/>

Our staff understand that children may not feel ready or know how to tell someone that they are being exploited, neglected or abused, and they may not recognise their experiences as harmful. Children could feel embarrassed, humiliated or threatened and this could be due to their vulnerability, disability and/ or sexual orientation or there could be language barriers. This should not prevent staff from having professional curiosity and speaking to the DSL if they have any concerns about a child. All staff will determine how best to build trusted relationships with children and young people which facilitate communication.

2.2 Child Protection Procedures

We will ensure that:

- this Safeguarding and Child Protection policy is made publicly available on the website and upon request from the school office
- parents and carers are aware of the fact that all cases of suspected abuse or neglect will be referred by the DSL to Children's Social Care and what our school's role is in this
- staff know this policy and use it appropriately
- the policy is reviewed and updated regularly.

2.3 What Staff or Volunteers Should Do If They Have Concerns About a Pupil in our School

Staff or volunteers who have any concern about a child, should discuss this immediately with the DSL or the Deputy DSL. If staff are uncertain whether their concern is a child protection matter, the DSL or Deputy DSL will help to determine the appropriate action.

Staff should never:

- do nothing
- assume someone else will report or deal with the matter
- try to resolve the matter themselves.

The process at The Willows School:

- all concerns should be reported verbally to the DSL/ Deputy DSL
- staff will record their concern clearly on the CPOMs database before the end of the working day
- **Supply Staff: Appendix 1- Safeguarding Recording Form** complete before the end of the working day
- where injuries are observed, they should be recorded on the form and on the CPOMs Body Map form; or see: **Appendix 2 – Body Map Guidance and Templates**). See 2.16 for guidance

2.4 Priorities the DSL Should Consider

- Am I dealing with 'risk' or 'need'? By definition, a child at risk is also a child in need. The DSL should determine the priority and level, or immediacy of risk balanced against need.
- Can the level of need identified be met by:
 - managing support for the child using the school's pastoral processes or resources
 - making an Early Help assessment
 - making a referral to statutory services as either a Child in Need or as suffering, or likely to suffer significant harm
 - making a referral to clinical services or CAMHS.

Additional considerations include:

- identifying resources available to the DSL and school, and knowing the limitations
- establishing the context in which the concern and/ or behaviour occurred
- the range of information available to the DSL, including about the child, parents/ carers, family and environment
- what information is inaccessible and how significant this might be
- the thresholds guidance: does it indicate that the level and/ or likelihood of risk is such that a child protection referral should be made (i.e. is a child suffering or likely to suffer significant harm?)
- who do I and don't I need to speak to now and what do they need to know?
- where can I access appropriate support and advice?
- if I decide not to make a referral, then what specific action am I going to take? This might include monitoring for a specified period; plan, discussion with parents/ carers or other professionals, recording etc.

2.5 DSL Feedback to Staff Reporting Concerns

It might not be possible or appropriate for the DSL to give feedback to staff who have reported a concern due to the rules of confidentiality. Feedback is shared on a 'need to know basis' decided upon by the DSL, who will consider what can be shared, with whom and when. Confidentiality will be maintained to promote and safeguard a child's welfare.

2.6 Consent and Information Sharing

Sensitive information is managed appropriately to ensure that our practice complies with the requirements and principles of the Data Protection Act 2018, local protocols and national guidance. All Branches staff, including the Proprietor and those responsible for governance are requested to read the our Data Protection Policy and the DfE Data Protection guidance for schools (DfE, 2024b). This guidance set out how to comply with data protection law; develop data policies; understand what staff and pupil data to keep; and prevent personal data breaches.

We believe that children are best protected when professionals work effectively together. Fears about sharing information cannot be allowed to stand in the way of the need to safeguarding and promote the welfare of children who are at risk of neglect or abuse.

All staff at The Willows School will pass on all information they hold and will not make any assumptions that someone else will act on their concerns and pass on information. We will work openly and honestly with Parents and Carers seeking consent wherever possible, based on what is in the best interests of the child(ren). The best interests of the child(ren) will always be our overriding consideration.

To safeguard children and keep them safe, information may be shared with other professionals outside our school. We will always aim to discuss concerns with parents or carers before information is shared, however this may not always be possible. If this is the case, then the law allows us to share this information without consent from parents/ carers. The Data Protection Act 2018 includes 'safeguarding children and individuals at risk' as a processing condition which allows professionals (practitioners) to share special category personal data with others. This includes allowing professionals to share Information without consent, if a professional is unable to, or cannot be reasonably expected to gain consent from an individual, where there is a good reason to do so, and that the sharing of that information will enhance the safeguarding of a child in a timely manner but

- it is not possible to gain consent
- it cannot reasonably be expected that a professional gain consent
- to gain consent would place the child at risk.

Relevant personal information can be shared lawfully if it is to keep a child or individual who is at risk, safe from neglect of emotional, mental or physical harm, or if it is protecting their emotional, mental or physical well-being. As a school, we will not provide a pupil's personal data where the **serious harm test under legislation is met*** for example, where a child is in a refuge or other form of emergency accommodation and the serious harm test is met.

**The harm test is explained on the Disclosure and Barring service website on GOV.UK. Section 31(9) of the Children Act 1989 as amended by the Adoption and Children Act 2002, available at <https://www.legislation.gov.uk/ukpga/1989/41/section/31>*

Further information is available via <https://www.gov.uk/guidance/data-protection-in-schools>

2.7 Involving the Police

There are times when the police might need to be involved when a situation relates to safeguarding or the welfare of a pupil. This could be due to a child suffering significant harm or due to a crime having been committed, e.g. assault, or a pupil carrying a weapon or drugs.

Before staff contact the police, they must liaise with the Headteacher and DSL to ensure they follow Branches Education Group protocols and internal advice. The Headteacher will make decisions based on the NCC guidance document, 'When to Call the Police' as well as our internal protocols.

NCC When to Call the Police: <https://www.safe4me.co.uk/wp-content/uploads/2020/02/CYP-schools-guide.pdf>

When the police arrive in school, the Headteacher, DSL or other senior staff, must be clear with the police what it is exactly they are asking them to do. They will seek information from the police on how they intend to deal with the matter and what action they will take and will ensure that where any pupil is spoken to or is to be searched in the context of being a suspect, there will be an Appropriate Adult present.

The **Appropriate Adult** will ensure that procedures are followed, whilst speaking up for the child's rights as required. Where possible, in the first instance, the parent or carer will be asked to act as the Appropriate Adult. Where this is not possible, any senior leader can be an Appropriate Adult with the exception of the Headteacher (unless waiting would cause unreasonable delay and the offence is not against this school).

See: Appropriate Adults <https://www.appropriateadult.org.uk/information/what-is-an-appropriate-adult>

2.8 Discussing with Parents our concerns or the intention to refer

The DSL will be as open and honest as possible in sharing and discussing concerns with parents/ carers and informing them of the intention to make a referral.

Referrals for Early Help and Child in Need (Section 17) will always be discussed with parents/ carers and their consent gained before making the referral.

See here for more information about Early Help Assessment:

<https://www.lancashire.gov.uk/practitioners/supporting-children-and-families/common-assessment-framework/>

Note: the guidance on 'Early help' has also been amended in line with Working together (2024). The update adds that professionals should be alert to the need for early help for a child who:

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

More information on early help is set out in Part one of KCSiE guidance with full details of the early help process in Working Together to Safeguard Children.

We will be as open and honest as possible in discussing with parents a Child Protection referral (Section 47) before the referral is made. However, there are some circumstances when a decision can and will be made to make a referral and share information, without a prior discussion with parents/ carers. This is because sharing the information might:

- cause further significant harm to the child
- cause undue delay
- impede an investigation.

These are a few examples of concerns where we would not discuss our intention to make a referral with parents/ carers:

- fabricated or induced illness (FII)
- forced marriage

- so-called 'Honour Based' Abuse
- intra-familial sexual abuse
- abusive images of children.

When we decide not to discuss our concerns with parents before we make a referral to Children's Social Care, the reasons for our decision will be recorded in the child's file. The decision will be dated, signed and confirmed in the referral to Children's Social Care.

The welfare of the child is always the paramount consideration.

2.9 Consideration for Referrals to Children's Social Care and Thresholds Guidance

The DSL will consider any information received against the Thresholds Guidance. Where a referral to Children's Social Care is made, the DSL will outline the concern clearly and link it to the Thresholds Guidance.

See Lancashire Thresholds guidance here:

<https://www.lancshiresafeguarding.org.uk/media/15003/Thresholds-Guidance-2016.pdf>

Lancashire Safeguarding have provided information about different levels of need, with example indicators of need for each level and the expected response to children and families who need additional help.

Lancashire Safeguarding: Levels of Need are summarised in the image below. This quick guide should be read in conjunction with the **Working Well with Children and Families in Lancashire** guidance:

<https://www.lancshiresafeguarding.org.uk/media/19299/wwwcf-part-1-and-2-final.pdf>



2.10 Referrals to Children's Social Care

Anyone can make a referral to Children's Social Care (CSC) although usually this will be the DSL or Deputy DSL who will make judgements around 'significant harm', levels of 'need' and when to make a referral in line with the procedures and threshold guidance from Lancashire's Children's Safeguarding Assurance Partnership (CSAP).

<https://www.lancashire.gov.uk/children-education-families/keeping-children-safe/social-care-support-for-children-and-families/> Where a DSL or Deputy DSL considers the concern in line with thresholds, a referral to Children's Social Care (CSC) is required. Two thresholds and their related criteria need to be carefully considered:

- (1) Child in Need/ Referral under Section 17 (S17) – see 2.11
- (2) Child Protection Matter/ Referral under Section 47 (S47) – see 2.12.

2.11 Child in Need/ Referral under Section 17 (s17)

(1) Is this a Child In Need?

Under section 17 (s.17 (10)) of the Children Act 1989, a child is in need if:

- (a) they are unlikely to achieve or maintain, or to have the opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority
- (b) their health or development is likely to be impaired, or further impaired, without the provision of such services
- (c) they have a disability.

Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under Section 17 (S17).

Where a s17 referral is made, the written referral to CSC will be completed and sent securely on the agreed Lancashire Children's Safeguarding Assurance Partnership (CSAP) pro forma. [Lancashire Children's Services Request for Support - Person completing this request for support - Online Forms \(achieveservice.com\)](#)

2.12 Child Protection Referral under Section 47 (s47):

(2) Is this a Child Protection Matter?

Under Section 47(1) of the Children Act 1989, a local authority has a duty to make enquiries where they are informed that a child who lives or is found in their area:

- (a) is the subject of an Emergency Protection Order
- (b) is in Police Protection; or where the local authority has
- (c) reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.

Therefore, the '**significant harm threshold**' justifies statutory intervention into family life. A professional making a child protection referral under Section 47 must therefore provide information which clearly outlines that a child is suffering or is likely to suffer significant harm.

Referrals under Section 47 do not require consent, however we recognise best practice that concerns should be discussed openly and honestly with parents/ carers and that they should be informed of a referral, unless it would:

- cause further significant harm to the child
- cause undue delay
- would impede an investigation

Where a child is at immediate risk or has suffered significant harm then a referral CSC and/ or police [as appropriate] will be required immediately.

Call to make a referral to CSC: 0300 123 6720

Call for the out of hours/ Emergency Duty Team (EDT): 0300 123 6722

Where a s47 referral is made, the written referral to CSC will be completed and sent securely on the agreed Lancashire Children's Safeguarding Assurance Partnership (CSAP) pro forma.

2.13 Early Help Referral

It is more effective to provide Early Help to support and promote the welfare of children than to react later. Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the early years through to teenage years. When it works best, Early Help can prevent further problems arising.

Effective Early Help relies upon local agencies working together to:

- identify children and families who would benefit from early help
- undertake an assessment of the need for Early Help
- provide targeted Early Help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child.

Schools are in a good position to identify concerns early, provide help for children and prevent concerns from escalating. Our school support system enables us to identify children who may benefit from Early Help. This means providing support as soon as a problem emerges.

At The Willows School, we have a weekly review of concerns around safeguarding, attendance and behaviours. We use information to inform actions. If Early Help is appropriate, the DSL will lead on liaising with other agencies in setting up an inter-agency assessment as appropriate. The DSL might delegate to another staff member the requirement to support other agencies and professionals in an Early Help assessment. This might result in school staff acting as the Lead Professional. In our school, the DSL will keep such cases under constant review and consideration given to a referral to CSC for assessment for statutory services, if the child's situation does not appear to be improving or declines.

We will do this in Partnership with parents/ carers and children and, where necessary, other agencies, in-line with locally agreed procedures and protocols.

In this context, Keeping Children Safe in Education 2024, makes it clear that any child may benefit from Early Help, but all school staff should be particularly alert to the potential need for Early Help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves

- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child

We recognise that those who are new to our school or are present on a temporary basis, can sometimes notice things and therefore the DSL will ensure that they are aware of reporting systems and have undergone the day one Safeguarding Briefing in school as appropriate. Everyone has a responsibility to report concerns, and everyone will be listened to and heard if they do so, whatever their role and however trivial or insignificant a concern may seem.

Staff may be required to support other agencies and professionals in an Early Help assessment and anyone who has a niggle or concern about the need for Early Help for a child or family should liaise with the DSL.

If needs can be met through providing support without a Social Worker being involved, then Early Help will be offered. This may be referred for assessment via Lancashire's Children and Family Wellbeing Service: <https://www.lancashire.gov.uk/practitioners/supporting-children-and-families/children-and-family-wellbeing-service/>

2.14 Recording Decision Making Rationales and communications with parents/ carers/ professionals

The DSL or deputy DSL will make a clear record of:

- how a concern was followed up and resolved
- any decisions made, actions taken and outcomes
- the decision-making rationale for all concerns and referrals.

Decision making rationales will clearly state why action has or has not been taken and this will be linked to the relevant points and level within the Thresholds Guidance. The DSL or Deputy DSL will also save all information and any documentation associated with the referral to the school safeguarding file.

All discussions and communications with parents or professionals in relation to a safeguarding or welfare concern must be recorded within TWO working days, in the safeguarding file.

The rationale for information sharing will be recorded and the record will state clearly what has been shared, with whom (including full name, designation and agency), when and why.

2.15 CSC Responses and Timescales for Referrals and Timescales

Following receipt of a referral, Children's Social Care should respond with a decision within ONE working day. CSC should set out the course of action it is taking, should let the referrer know and provide advice to the referrer and/ or child/ family.

Responses include:

- take no further action
- step down to Early Help
- referral to another agency who can provide services
- convening a Strategy Meeting, within FIVE working days
- providing support services under Section 17
- undertaking a Child and Family Assessment
- undertaking a s47 Enquiry
- convening an Initial Child Protection Conference, within 15 working days of a Strategy Meeting/ discussion
- accommodating the child under Section 20, with parental consent

- making an application to court for an Order.

Feedback from Children's Social Care

Children's Social Care should acknowledge receipt of a written referral within ONE working day. If the referrer has not received an acknowledgement within 3 working days, they should contact the Manager in the Children's Social Care Services team.

Where the DSL or person making the referral does not agree with the outcome of a referral or with the actions of Children's Social Care, they will follow Lancashire Children's Safeguarding Assurance Partnership procedures:

https://panlancashirescb.proceduresonline.com/chapters/p_resolving_prof_disagree.html

If the case is already open and there are disagreements about how it managed or the decisions made, then the DSL will follow Lancashire Children's Safeguarding Assurance Partnership's Resolving Professional Disagreements (Escalation and Conflict Resolution):

https://panlancashirescb.proceduresonline.com/chapters/p_resolving_prof_disagree.html

2.16 Recording and Reporting Concerns in the school

All staff who have a concern about a child will speak to the DSL immediately. We recognise that accurate and up-to-date record keeping is essential for several reasons:

- it helps us identify causes for concern at an early stage. Often it is only when several seemingly minor issues are taken as a whole that a safeguarding or child protection concern becomes clear
- it helps the school to monitor and manage its safeguarding practices
- it helps to evidence robust and effective safeguarding practice in inspections and audits
- accurate, detailed records are important where there are child protection and safeguarding concerns e.g. a chronology of information gathered, and action taken.

It is important that concerns are fully completed in a timely way and any concern **MUST** be recorded before the end of the working day. The details are important. To help the DSL to respond appropriately, please follow the guidance below.

Branches Education Group staff:

- use CPOMs to record concerns on the child/ young on the database - **see Appendix 1 – Safeguarding Recording Form (CPOMs)**
- ensure that all information boxes are completed
- ensure the concern is entered in detail, preferably using the child's own words
- to help describe injuries on the body, use the injuries section and complete the body map
- describe the size and shape of any marks
- do not try to explain what you think caused the marks.
- each injury has a number, link that number to the number relating to the explanation for the injury in the nature of the concern section
- do not take photographs
- do not report what other people have told you. This is second hand, and they must record their own concern
- do not record on behalf of someone else. All accounts must be first-hand
- remember that concern records are used in court cases and inquests as primary documents, so they must be complete and accurate

- if you jot notes on a piece of paper whilst talking to the child or immediately afterwards, record the child's name and date of birth, the date and time, sign, print and write your designation; give the notes to the DSL who will upload them to the system
- do not email concerns to the DSL. Emails can get missed or go to the wrong person.

Agency/ or Supply Staff and Volunteers (without access to CPOMs) – should read the guidance above and then refer to **Appendix 2 - Body Map Guidance and Templates**. This explains clearly what to record. Please speak to the Headteacher/ DSL or Deputy DSL if support is required to complete the forms.

Where any staff members have any concerns about a child's welfare, they must act immediately, in the first instance, this means discussing those concerns with the DSL or Deputy DSL. It is always safer to discuss the matter with the DSL to ensure that a child is safe, or to stop a problem from escalating, than it is to assume and/ or hope that everything 'will be ok'. You will not be 'bothering anyone', 'wasting their time' or 'being a nuisance', you are acting to safeguard children.

All of the following concerns MUST ALWAYS be reported to the DSL without delay:

(this list is not exhaustive)

- any child that is injured, marked, or bruised
- where the child is able to articulate an issue, but the explanation is inconsistent or changes
- any behaviours which give rise to suspicions that a child may have suffered harm. For example, significant changes in behaviour, demeanour, worrying doodles or drawings, or unusual social/ play
- any concerns that a child returning from home may have been receiving inadequate care, suffering or likely to suffer any form of abuse or neglect
- any significant changes to a child's presentation
- any hint or disclosure of abuse or neglect by a child or from any other person, including disclosures of abuse or neglect perpetrated by adults outside of the family or by other children or young people
- excessive staff-pupil one-to-one attention beyond the requirements of a staff member's usual role and responsibilities
- inappropriate behaviour online, e.g. sharing indecent images, nudes or semi-nudes.

2.17 Listening to Children and Managing 'Disclosures'

The table in **Appendix 4 – Listening and Recording** provides staff guidance on how to respond and listen to a child who is worried, or who has something difficult to say.

Children must be listened to.

They must be taken seriously.

They must be heard.

There are no exceptions to this. Children need to know that their worries and concerns will be treated seriously and that they can express their views and give feedback. All adults in the school should be clear about how to respond appropriately to someone who needs to talk.

Following a disclosure or conversation, staff must report it verbally to the DSL immediately. They will then need to make a record of it. Document your conversation as soon as possible and before the end of the working day, using the child's actual words. Keep your remarks factual and do not write down what you think the child means.

3.0 CHILD ABUSE, NEGLECT and EXPLOITATION

3.1 Definitions and Indicators

Working Together to Safeguard Children 2023 defines abuse and neglect as a form of maltreatment of a child. KCSiE 2024 includes an update to include exploitation in every reference to child abuse and neglect. This update has been added throughout this policy.

Someone may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused, neglected or exploited:

- in a family or in an institutional or community setting
- by those known to them or more rarely, by others
- wholly online, or technology may be used to facilitate offline abuse
- by an adult or adults or another child or children.

In our school, we recognise that abuse, neglect and exploitation safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. All staff are aware that safeguarding incidents and/ or behaviours can be associated with factors outside the school and/ or can occur between children outside of the school environment. All staff, but especially our DSL and Deputy will consider whether children are at risk of abuse, neglect and exploitation situations outside of their families. Extra-familial abuse takes a variety of different forms.

All staff are aware that technology is a significant component in many safeguarding and well-being issues. Children are at risk of abuse online as well as in day-to-day life. In many cases, abuse will take place concurrently via online channels and in daily life. Staff in schools are well placed to identify concerns. Not all concerns are immediately obvious, and staff may identify indicators such as changes in emotional or physical presentation, attendance issues and social and behavioural issues that might indicate that the child is suffering significant harm. Any changes in the baseline behaviour of a child will be discussed with the DSL immediately.

Staff also need to be mindful of what Serious Case Reviews have termed the 'Toxic Trio', which looks at the correlation between:

- parental substance misuse, including alcohol use
- parental mental ill health
- domestic abuse, or violence in the home.

Either collectively or individually, the 'Toxic Trio' issues will impact on parenting capacity or will need support at any level of the continuum of need or equivalent. We will closely monitor any child where the 'Toxic Trio' may be a factor.

Further useful information can be found at:

www.nspcc.org.uk/core-info <https://www.minded.org.uk/>

Definitions of abuse, neglect and exploitation: **see Appendix 5**

Indicators of Abuse, Neglect and Exploitation: **see Appendix 6**

3.2 Extra-Familial Harm

We recognise that safeguarding incidents and/ or behaviours can be associated with factors outside of the school and/ or can occur between children outside the school. All staff, but especially the DSL or Deputy DSL will consider whether children are at risk of abuse of exploitation in situations outside their families.

Extra-familial harms take many different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), sexual and/ or criminal exploitation, serious youth violence, county lines, and radicalisation.

4.0 CHILDREN IN SPECIFIC CIRCUMSTANCES

Keeping children Safe in Education 2024, Part 1 and Appendix B, outline a range of safeguarding issues. Among those are what the Local Safeguarding Partnership procedures refer to as Children in Specific Circumstances.

4.1 So called 'Honour-based' Abuse

'Honour based' crime, violence or 'honour-based' abuse or 'izzat' are umbrella terms used to describe a range of practices used mainly to control and punish the behaviour of a member of a family or social group, to protect perceived cultural and religious beliefs in the name of 'honour'.

These crimes of violence are targeted mainly but not exclusively against girls and women, although boys can suffer too. The crimes include assault, imprisonment and murder where the person is being punished by their family or their community. Victims are punished for allegedly undermining or not following, what the family or community believes to be the correct code of behaviour. By not following this correct code of behaviour, the person shows that they have not been properly controlled to conform by their family and this is viewed as bring "shame" upon or "dishonour" to the family.

It can be distinguished from other forms of abuse, as it is often committed with some degree of approval and/ or collusion from family and/ community members. 'Honour Based' Abuse might be linked to or a trigger for a forced marriage. Victims can be abused by multiple perpetrators not only in the United Kingdom.

Where there are concerns about actual or risk of 'Honour Based' Abuse or violence, we will follow the

One Chance Rule: you may have only one chance to speak to a potential victim of 'Honour Based' Abuse or violence. Therefore, **you may have only one chance to save a life.**



Where there are any concerns relating to 'Honour Based' Abuse, we will follow the Local Children's Safeguarding Assurance Partnership (CSAP) procedures.

See 7 Minute Briefings and: [Honour Based Abuse – a safeguarding response - Safeguarding Hub](#)

4.2 Forced Marriage

A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. This coercion or duress can include physical, psychological, financial, sexual and emotional pressure. In the cases of some vulnerable adults who lack the capacity to consent, coercion is not required for a marriage to be forced.

Emotional control includes removing from school or education, controlling freedom of movement up to and including house arrest, preventing the victim from learning English, preventing professionals from having any individual contact with the victim. In the case of incoming spouses, threatening to have incoming spouses deported to the country of origin. Often threats will include removal of the victim's children, control over the victim's passport or visa status, use of Black Magic by way of amulets, potions or spells to exert control over the victim.

Physical abuse can involve parents and siblings, husbands and in-laws in terms of an extended family and/ or community members. This includes the spectrum of physical abuse from threats of physical violence, up to and including acid attacks and murder.

Financial abuse includes controlling the income of the victim. Many victims will be refused access to any money, even in some cases their own earnings, to maintain control and dependency.

Sexual abuse includes where there has been Forced Marriage there is often criminal behaviour such as kidnap and abduction, false imprisonment, administering noxious substances (to ensure compliance) and rape. There have been cases of victims having been drugged as part of an abduction both within the UK and to remove victims from the UK for the purposes of marriage.

Emotional abuse includes threats of harm to the victim or a third party and can be led by family members, both here and in other countries of origin. Criticism and humiliation of the victim and enforced servitude by way of unpaid work, either in a family business or within the home. This is sometimes referred to as a form of domestic slavery. This abuse can involve the victim's children being removed from her care to be cared for by another member of the extended family.

Emotional abuse can include threats by the perpetrator to harm themselves (i.e. I will kill myself if you do not marry him or her). They can include shaming in front of the entire community.

Community collusion: there is a distinct difference between domestic violence and so called 'Honour Based' Abuse or Violence in that there is an element of collusion between perpetrators, whether they are members of the victim's family, in-laws, extended family and/ or the wider community.

Confidentiality and disclosure risk can escalate very suddenly. The same level of confidentiality will be applied as to any other safeguarding matter. It should always be remembered that in the cases of so called 'Honour Based' Abuse and Forced Marriage, perpetrators may go to enormous lengths to obtain information about the whereabouts of a victim in hiding, up to and including hacking into information held in computer databases. In some cases, existing family or professional networks have been used, e.g. Taxi Drivers. Professionals, including GPs and even MPs have been asked to divulge information about victim whereabouts.

Special care should be given when considering the use of interpreters and advice should be taken if you are unsure as to who is likely to be safe.

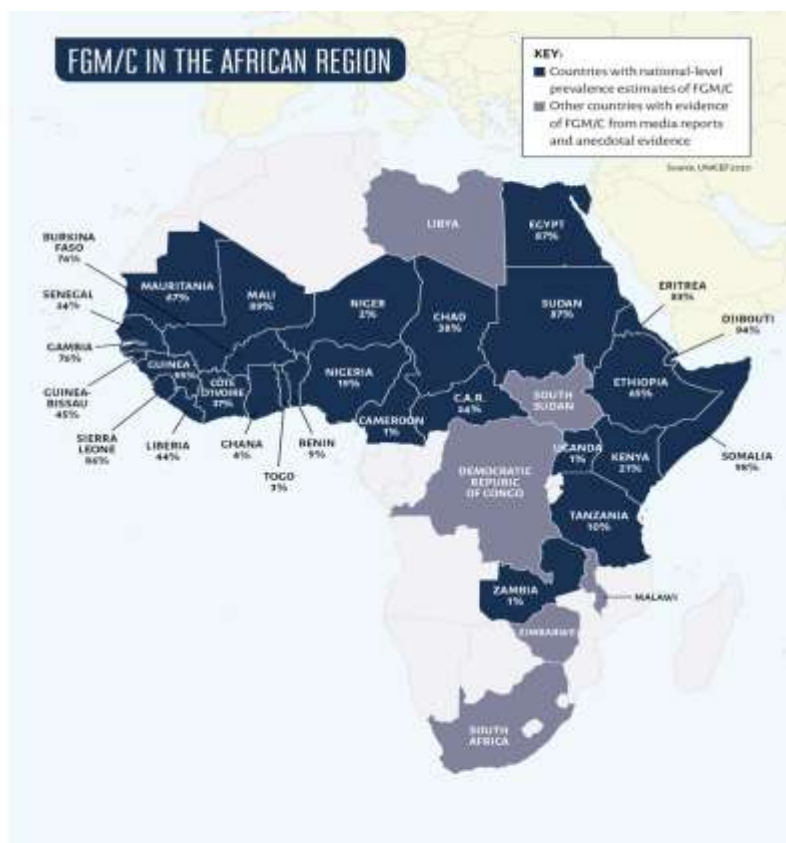
Where we have concerns relating to Forced Marriage, we will follow the Local Children's Safeguarding Assurance Partnership (CSAP) procedures for Forced Marriage.

Further information is available from the Forced Marriage Unit Tel: 020 7008 015; email: fm@fcdof.gov.uk and [Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage \(accessible version\) - GOV.UK \(www.gov.uk\)](#) .

4.3 Female Genital Mutilation (FGM)

Female Genital Mutilation comprises all procedures involving partial or total removal or alteration of the external female genitalia for non-medical reasons. **FGM is illegal in the UK** and a form of child abuse with long-lasting harmful consequences. FGM is viewed by some as a 'natural and beneficial practice' carried out by a loving family. These beliefs place barriers in the way of [potential] victims coming forward to raise concerns or talk openly.

Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them. UNICEF indicates that 200 million women and girls in 30 countries in Africa and the Middle East have experienced FGM or Cutting. The map below gives an indication as to incidence and prevalence:



FGM has also been documented in Iraq, Israel, Oman, UAE, Occupied Palestinian Territories, India, Indonesia, Malaysia, and Pakistan. It can also happen anywhere in the UK. The age range for FGM is infancy to 15 years of age and occasionally adult women. Predominantly FGM takes places between the ages of 3 and 12 years:

Indicators include:

- Family origins are from a country where it is practiced;
- mother or a sister who has undergone FGM;
- mention of a 'party', 'celebration', 'becoming a woman';
- visiting older relatives visiting from the country of origin;
- being taken on an extended holiday to the country of origin – particularly in the 3 weeks leading up to the school summer holidays.
- talk about a 'special' procedure to become a woman

Further information can be found in the multi-agency statutory guidance on Female Genital Mutilation, the FGM resource pack particularly section 13 and Female Genital Mutilation: Guidance for schools.

[6.7166 HO FBIS BN O Leaflet A4 FINAL 080321 WEB.pdf \(publishing.service.gov.uk\)](#)

Where we have concerns relating to Female Genital Mutilation, we will follow the Local Children's Safeguarding Assurance Partnership (CSAP) procedures

[FGM-Schools-Guidance-National-FGM-Centre.pdf \(nationalfgmcentre.org.uk\)](#)

Since 31 October 2015, all teachers who discover, either by disclosure by the victim or visual evidence, that FGM appears to have been carried out on a child under the age of 18 years, will immediately report this themselves to the police. They will consider discussing this with the DSL, unless there is a specific reason not to do so and involve CSC as appropriate. (Serious Crime Act 2015, statutory duty to report from section 5B of the FGM Act 2003 (s74).

4.4 Religious Beliefs and Linked Abuse

Research indicates that beliefs in 'spirit possession' or 'witchcraft' are widespread across the world. This is not confined to certain countries, cultures or religions, nor is it confined to new immigrant communities in this country.

These beliefs occupy a broad spectrum, and the effects range from harmless to harmful. Belief in spirit possession and witchcraft is not in itself evidence of maltreatment. Although the number of known child abuse cases linked to accusations of 'spirit possession' or 'witchcraft' in Britain is small, it is possible that a significant number of cases go undetected. The nature of the abuse can be particularly disturbing and the impact on the child is substantial and serious.

There are links between 'spirit possession' and 'witchcraft' and exploitation in that belief in magic or witchcraft may be used to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

Terminology

The term 'spirit possession' means that a force, spirit, God or demon has entered a child and is controlling him or her, resulting in a change in health or behaviour. Sometimes the term 'witch' or 'witchcraft' is used. This is the belief that a child can use an evil force or supernatural powers to harm others. There is a range of terminology connected to such beliefs, for example black magic, kindoki, ndoki, the evil eye, djinns, voodoo, obeah and child sorcerers.

Families, carers and the children involved can hold genuine beliefs that evil forces are at work. Families and children can be deeply worried by the evil that they believe is threatening them. There may also be an element of the adult gaining some gratification through the ritualistic abuse of the child, which may even result in the death of the child.

Vulnerability

In cases of 'spirit possession' or 'witchcraft' which involve children, the parent/ carer views the child as 'different' and attributes this to the child being 'possessed'. This can lead to attempts to exorcise the child to rid the body or mind of 'demons'. The reasons for being 'different' can be varied, and include disobedience, independence, bedwetting, nightmares or illness. In some cases, there will be no obvious difference and the child will have been targeted because they are perceived to be 'spiritually' different. The attempt to exorcise

may involve beating, burning, starvation, cutting/ stabbing and/ or isolation within the household, all of which constitute abuse.

Indicators

Indicators of abuse linked to belief in spirit possession, which may also be common features in other kinds of abuse, include:

- a child reporting that they are, or have been, accused of being 'evil', and/ or that they are having the 'devil beaten out of them'
- signs of physical abuse
- a child becoming noticeably confused, withdrawn, disorientated or isolated
- personal care or hygiene deteriorating
- school attendance becoming irregular or child being taken out of school altogether
- a deterioration in a child's performance at school
- lack of parental concern or attachment.

Where there are concerns that any child or young person is at risk or has suffered abuse linked to religious beliefs and linked abuse, we will follow the Local Children's Safeguarding Assurance Partnership (CSAP) procedures:

[One Minute Guide Child Abuse Linked to Faith or Belief.pdf \(togetherforchildren.org.uk\)](https://www.togetherforchildren.org.uk/resources/one-minute-guide-child-abuse-linked-to-faith-or-belief.pdf)

[Action Plan - Abuse linked to Faith or Belief.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444444/action-plan-abuse-linked-to-faith-or-belief.pdf)

4.5 Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

- (a) in exchange for something the victim needs or wants, and/ or
- (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge e.g. through copying videos and images they have created and posted on social media.

Through our curriculum, school staff will raise awareness around positive healthy relationships and where appropriate specifically raise awareness of CSE and the grooming process.

Any concerns about CSE will be reported to the DSL who will follow the Local Children's Safeguarding Assurance Partnership (CSAP) procedures [ch sx exploit stanard op pr.pdf \(proceduresonline.com\)](https://proceduresonline.com/ch-sx-exploit-standard-op-pr.pdf)

Prior to any referral being made the DSL will use the safeguarding procedures CSE screening tool – Appendix A of [ch sx exploit stanard op pr.pdf \(proceduresonline.com\)](https://proceduresonline.com/ch-sx-exploit-standard-op-pr.pdf).

Staff recognise that any child from any walk of life is vulnerable to CSE and many children will not recognise that they are a victim and will often be closer to those abusing them than those trying to help them. Staff recognise that children can be abused in the real world and the virtual world. Research tells us that some children are more vulnerable to CSE; these may include children who are looked after and children with learning difficulties

or disabilities. It is estimated that a third of victims are boys although research tells us that like child sexual abuse, girls are more likely to disclose abuse than boys.

With regards to consent, some children will believe that they are in a loving relationship. No child, no matter what age can give consent to sexual abuse even where a child may believe that they are engaging voluntarily in sexual activity with the person or persons who is exploiting them. It is not only adults who groom and exploit children; they can be groomed by peers and/ or as part of gang related activity.

Signs of CSE or Grooming:

- [Unhealthy or inappropriate sexual behaviour](#)
- Being frightened of some people, places or situations
- Being secretive
- Sharp changes in mood or character
- A sudden change in their family relationships/ dynamics
- Having money or things they can't or won't explain, e.g. hotel key cards or unexplained gifts
- Physical signs of abuse, like bruises or bleeding in their genital or anal area
- Sudden change in physical appearance including clothes and hygiene levels
- [Alcohol or drug misuse](#)
- Sexually transmitted infections
- A sudden and urgent request to go onto contraception or to obtain the 'morning after pill'
- Pregnancy
- Absence from school
- Use of technology; sexual bullying
- Distrust of authority figures
- Having an older person they view as their boyfriend or girlfriend
- Staying out late or overnight
- Having a new group of friends
- Missing from home or care or stopping going to school or college
- Hanging out with older people, other vulnerable people or in antisocial groups
- Involved in a [gang](#)
- Involved in criminal activities like selling drugs or shoplifting.

4.6 Serious Violence

At The Willows School, all staff are aware of the indicators that might signal that children are at risk from or are involved in serious violence. These might include:

- increased absence from education
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in well-being

- signs of assault or unexplained injuries
- unexplained gifts or new possessions.

These may indicate that children have been approached by, or involved with, individuals associated with criminal networks or gangs. The Police, Crime, Sentencing and Courts Act 2022 (“the PCSC Act”) makes clear that violence is not limited to physical violence against the person. It provides that, for the purposes of the Serious Violence Duty (December 2022), violence includes:

- domestic abuse
- sexual offences
- violence against property
- threats of violence but does not include terrorism.

4.7 Children affected by Gangs and Youth Violence

Defining a gang is difficult. They tend to fall into three categories: peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather in public places to socialise, and although some peer group gatherings can lead to increased anti-social behaviour and low-level youth offending, these activities should not be confused with the serious violence of a street gang.

A street gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity. A street gang will engage in criminal activity and violence and may lay claim over territory (not necessarily geographical for example it could include an illegal economy territory). They have some form of identifying structure featuring a hierarchy usually based on age, physical strength, propensity to violence or older sibling rank. There may be certain rites involving antisocial or criminal behaviour or sex acts to become part of the gang. They are in conflicts with other similar gangs.

There is a distinction between organised crime groups and street gangs based on the level of criminality, organisation, planning and control. However, there are significant links between different levels of gangs for example street gangs can be involved in drug dealing on behalf of organised criminal groups. Young men and women may be at risk of sexual exploitation in these groups.

Children may be involved in more than one 'gang', with some cross-border movement, and may not stay in a 'gang' for significant periods of time. Children rarely use the term 'gang', instead they used terms such as 'family', 'breddrin' (brethren), 'crews', 'cuz' (cousins), 'my boys' or simply 'the people I grew up with'.

Risks

The risk or potential risk of harm to the child may be as a victim, a gang member or both - in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation. Violence is a way for gang members to gain recognition and respect by asserting their power and authority in the street, with a large proportion of street crime perpetrated against members of other gangs or the relatives of gang members.

The specific risks for males and females may be quite different. There is a higher risk of sexual abuse for females and they are more likely to have been coerced into involvement with a gang through peer pressure than their male counterparts. There is evidence of a high incidence of rape of girls who are involved with gangs. Some

senior gang members pass their girlfriends around to lower ranking members and sometimes to the whole group at the same time. Very few rapes by gang members are reported.

Gang members often groom girls at school using drugs and alcohol, which act as disinhibitory, and also create dependency, and encourage/ coerce them to recruit other girls through school/ social networks.

Indicators

- Child withdrawn from family
- Sudden loss of interest in school or change in behaviour
- Decline in attendance or academic achievement (although it should be noted that some gang members will maintain a good attendance record to avoid drawing attention to themselves)
- Being emotionally 'switched off', but also containing frustration/ rage
- Starting to use new or unknown slang words
- Holding unexplained money or possessions
- Staying out unusually late without reason, or breaking parental rules consistently
- Sudden change in appearance – dressing in a particular style or 'uniform' similar to that of other young people they hang around with, including a particular colour
- Dropping out of positive activities
- New nickname
- Unexplained physical injuries, and/ or refusal to seek/ receive medical treatment for injuries
- Graffiti style 'tags' on possessions, schoolbooks, walls
- Constantly talking about another young person who seems to have a lot of influence over them
- Breaking off with old friends and hanging around with one group of people
- Associating with known or suspected gang members, closeness to siblings or adults in the family who are gang members
- Starting to adopt certain codes of group behaviour e.g. ways of talking and hand signs
- Going missing
- Being found by Police in towns or cities many miles from their home
- Expressing aggressive or intimidating views towards other groups of young people, some of whom may have been friends in the past
- Being scared when entering certain areas; and
- Being concerned by the presence of unknown youths in their neighbourhoods.

Depending on how the young person communicates to you that they are in a gang, will influence your response. Such a statement may be their declaration of allegiance to their chosen gang or conversely, it may be a cry for help, asking for you to acknowledge their problem and for you to support them to get away from the gang.

An important feature of gang involvement is that the more heavily a child is involved with a gang, the less likely they are to talk about it. There are links between gang-involvement, criminal exploitation and young people going missing from home or care.

Some of the factors that can draw gang-involved young people away from home or care into going missing are linked to their involvement in carrying out drugs along county lines. There may be gang-associated child sexual exploitation and relationships that can be strong pull factors for girls who go missing.

Where we have concerns relating to gang involvement or youth violence, we will follow the Local Children's Safeguarding Assurance Partnership (CSAP) procedures.

[5.22 Gang, Group Activity and Criminal Exploitation Affecting Children \(proceduresonline.com\)](#)

[Exploitation Toolkit 2021 FINAL Lancashire Violence Reduction Network.pdf \(lancsvrn.co.uk\)](#)

4.8 Child Criminal Exploitation (CCE) and County Lines

Child Criminal exploitation occurs when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/ or

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

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

Dangers associated with CCE:

- being subject to threats, blackmail and violence
- being arrested, including for crimes committed by the gang that they have not directly committed under the law of joint enterprise
- having their safety or the safety of friends and family threatened
- risk of emotional abuse
- abusing drugs, alcohol and other substances
- being exploited and forced to commit crimes
- not being able to leave or cut off ties with the gang
- risk of physical harm, rape and sexual abuse
- risk of severe injury or being killed
- long term impact on education and employment options.

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas/ counties within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons.

A typical county lines scenario is defined by the following components:

- A group (not necessarily affiliated as a gang) establishes a network between an urban hub and another location, into which drugs (primarily heroin and crack cocaine) are supplied.
- A branded mobile phone line is established in the market, to which orders are placed by introduced customers.
- The line will commonly (but not exclusively) be controlled by a third party, remote from the market.
- The group exploits young or vulnerable persons, to achieve the storage and/or supply of drugs, movement of cash proceeds and to secure the use of dwellings (commonly referred to as cuckooing).
- The group or individuals exploited by them regularly travel between the urban hub and the other locations, to replenish stock and deliver cash.
- The group is inclined to use intimidation, violence and weapons, including knives, corrosives and firearms.

Some indicators of county lines involvement and child criminal exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out-of-area.
- Unexplained acquisition of money, clothes, or mobile phones.
- Excessive receipt of texts/ phone calls.
- Relationships with controlling/ older individuals or groups.

- Leaving home/ care without explanation.
- Suspicion of physical assault/ unexplained injuries.
- Parental concerns.
- Carrying weapons.
- Significant decline in school attendance and academic outcomes.
- Gang association or isolation from peers or social networks.
- Self-harm or significant changes in emotional well-being.

Common terminology

- Cuckooing: where gangs establish a base in the market location by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'.
- Going country: term that describes county lines activity. It can also mean the act of travelling to another city/ town to deliver drugs or money.
- Trapping: the act of moving drugs from one town to another or the act of selling drugs in one.
- Trap House: a building used as a base from where drugs are sold (or sometimes manufactured). These houses are usually occupied by someone (usually adult drug users but sometimes young people are forced to stay in trap houses).
- Trap Line: when someone owns a mobile phone specifically for the purpose of running and selling of drugs.

Where we have concerns regarding County Lines, we will follow the Local Children's Safeguarding Assurance Partnership (CSAP) procedures.

[5.22 Gang, Group Activity and Criminal Exploitation Affecting Children \(proceduresonline.com\)](#)

County Lines Toolkit For Professionals - The Children's Society in partnership with Victim Support and National Police Chiefs' Council [County Lines Toolkit For Professionals | The Children's Society \(childrenssociety.org.uk\)](#)

Further information is available in the Home Office publication:

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

4.9 Modern Slavery and Human Trafficking

Modern slavery is a form of organised crime in which individuals including children and young people are treated as possessions or commodities and are exploited for criminal gain. Children are recruited, moved or transported and then exploited, forced to work or sold.

The Modern Slavery Act 2015 (applicable mostly in England and Wales) includes two substantive offences:

- (i) human trafficking, and
- (ii) slavery, servitude and forced or compulsory labour.

Boys and girls of all ages are affected and can be trafficked into, within ('internal trafficking'), and out of the UK for many reasons and all forms of exploitation - e.g. sex trafficking. Children can be groomed and sexually abused before being taken to other towns and cities where the sexual exploitation continues.

Victims are forced into sexual acts for money, food or a place to stay. Other forms of slavery involve children who are forced to work, criminally exploited and forced into domestic servitude. Victims have been found in brothels or saunas, farms, in factories, nail bars, car washes, hotels and restaurants and commonly are exploited in cannabis cultivation.

Debt bondage where someone is forced to work to pay off debts, which realistically they will never be able to pay off, organ harvesting, and benefit fraud are other types of modern slavery.

Children and young people may be exploited by parents, carers or family members. Often the child or young person will not realise that family members are involved in the exploitation. Some young people may not be victims of human trafficking but are still victims of modern slavery.

Slavery, servitude and forced or compulsory labour may also be present in trafficking cases; however, not every young person who is exploited through forced labour has been trafficked.

Indicators:

A reluctance to seek help. Victims may be wary of the authorities for many reasons such as not knowing who to trust or they may have a fear of deportation or concern regarding their immigration status, so may avoid giving details of accommodation or personal details.

- The victim seeming like a willing participant in their exploitation, e.g. involvement in lucrative criminal activity. However, this does not mean they have benefitted from the proceeds.
- Discrepancies in the information victims have provided due to traffickers forcing them to provide incorrect stories.
- An unwillingness to disclose details of their experience due to being in a situation of dependency.
- Brought or moved from another country.
- An unrelated or new child discovered at an address.
- Unsatisfactory living conditions: may be living in dirty, cramped or overcrowded accommodation.
- Missing from care, home or school - including a pattern of registration and de-registration from different schools.
- Children may be found in brothels and saunas.
- Spending a lot of time doing household chores.
- May be working in catering, nail bars, caring for children or cleaning.
- Rarely leaving their home, with no freedom of movement and no time for playing.
- Orphaned or living apart from their family, often in unregulated private foster care.
- Limited English or knowledge of the local area in which they live.
- False documentation, no passport or identification documents.
- Few or no personal effects; few personal possessions and tend to wear the same clothing.
- No evidence of parental permission for the child to travel to the UK or stay with the adult.
- Little or no evidence of any pre-existing relationship with the adult or even an absence of any knowledge of the accompanying adult.
- Significantly older partner.
- Underage marriage.

Physical Appearance: victims may show signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn. Physical illnesses, including work-related injuries through poor health and safety measures, or injuries apparently because of assault or controlling measures. There may be physical indications of working, e.g. overly tired in school or indications of manual labour.

Sexual health indicators: sexually transmitted infections or pregnancy, injuries of a sexual nature and/ or other gynaecological symptoms.

Psychological indicators: suffering from post-traumatic stress disorder, which may include symptoms of hostility, aggression and difficulty with recalling episodes and concentrating. Depression/ self-harm and/ or suicidal feelings; an attitude of self-blame, shame and extensive loss of control; drug and or/ alcohol use.

Where we have concerns relating to Modern Slavery, we will follow the Local Children's Safeguarding Assurance Partnership (CSAP) procedures:

4.10 Child on Child Abuse

The term 'victim' is a term which is widely used and understood. We recognise that not every child who has been subjected to abuse recognises themselves as a victim, in some cases we will use the term victim and alleged perpetrator or perpetrator where appropriate. We will also use the terms a child who has harmed and a child who has been harmed.

At The Willows School, we recognise that children are capable, can and do abuse other children. Any incidents of alleged or suspected abuse by children or young people will be taken seriously and reported to the DSL immediately.

Staff must also be alert to the possibility that a child or young person who has harmed another may also be a victim and, as such, they may have significant unmet needs themselves.

Child on child abuse might take various forms; for example (*and the following list is not exhaustive*):

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence, such as rape, assault by penetration and sexual assault.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Upskirting, which typically involves taking a picture under a person clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Consensual and non-consensual sharing of nudes and semi-nude images and/ or videos.
- Initiation/ hazing type violence and rituals.

We recognise that addressing inappropriate behaviour, even if it appears to be relatively innocuous or minor, can be an important intervention that helps prevent problematic, abusive and/ or violent behaviour in the future. We know that child on child abuse might manifest differently for boys and girls. For example, girls being touched inappropriately or coerced into sexual activity, boys being initiated into gangs etc. Such abuse may also be indicative of a previous or ongoing abusive experience for a perpetrator and/ or victim. Research indicates that children with SEND, Additional or Complex Needs are particularly vulnerable.

Staff will be mindful of the added vulnerability of children and young people who have been the victims of violent crime, including the risk that they may react to this by abusing younger or weaker children. The alleged perpetrator is likely to have considerable unmet needs, as well as posing a significant risk of harm to other children. Evidence suggests that such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or sexual abuse, may have problems in their educational development and may have committed other offences. They may, therefore, be suffering, or at risk of suffering, significant harm and need protection. Consequently, any plan to reduce and/ or manage risk posed by a child who is alleged to have harmed another must also address their needs and [multi-agency] responses should not be about criminalising children unnecessarily.

We recognise that it is not enough 'just' to respond to incidents as and when they arise. Therefore, we will minimise the possibility of child-on-child abuse by:

- creating and maintaining an environment which is safe, caring, respectful and stimulating, and which seeks to promote the social, emotional, physical and moral development of our pupils
- ensuring that core safeguarding and child protection policies and procedures link to, are understood and implemented in conjunction with other. Related policies and procedures including PSHCEE, RSE, Online and E-Safety, Anti-Bullying, Behaviour, Rewards and Sanctions, Whistleblowing, Staff Code of Conduct, Allegations against Staff (including procedures to manage Low Level Concerns).
- actively discouraging and challenging all unacceptable attitudes and behaviour, including all forms of bullying and abuse. We will also challenge the attitudes and behaviours which underpin it
- having in place clear strategies for promoting positive behaviour, including a system of rewards and sanctions that is clear to staff, pupils and parents/ carers alike
- maximising opportunities within the curriculum, via PSHCEE, assemblies and focused days or weeks to deliver key keeping safe and associated behavioural, spiritual, moral, social and cultural messages (SMSC)
- Using external resources and expertise e.g. the NSPCC's 'Pants/ Underwear Rule' guidance and drawing upon the expertise of external speakers and groups
- striking appropriate balances between pupils' rights to privacy and the need for proportionate supervision to keep them safe in and around school
- ensuring that all adults associated with our school understand their role and responsibilities to act as positive role models
- ensuring that staff and any volunteers are trained to look for and respond appropriately to any potential indicators of child-on-child abuse
- seeking appropriate and timely advice where uncertainty exists and/ or concerns arise e.g. from Children's Social Care
- ensuring that children, and parents/ carers know how to raise any worries or concerns with staff in school and by signposting them to appropriate sources of advice and support outside the school.

[Shore Space](#) is an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

[The Children's Society - preventing child sexual exploitation](#) provides resources for CSE prevention.

4.11 Sexual Violence and Sexual Harassment between children in the school

At The Willows School, we recognise that sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into college. We understand that it can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and/or face to face and can occur simultaneously. It is never acceptable. The starting point regarding any report of this kind of behaviour is a zero-tolerance approach that is never acceptable and will not be tolerated. We will take each report seriously and ensure that both the victim and perpetrator are supported. Any report of sexual violence or sexual harassment will be taken seriously. Staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

In our school, any victim will be taken seriously and will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment and will not be made to feel ashamed for making a report. It is recognised that children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in

all likelihood, adversely affect their educational attainment and will be exacerbated if the child who has harmed or allegedly harmed attends our school also. We are aware that safeguarding incidents and/ or behaviours can be associated with factors outside of our school including intimate personal relationships.

Our staff:

- have the attitude that 'it could and might happen here'
- understand that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- will take concerns seriously and not dismiss sexual violence or sexual harassment as "banter" or "part of growing up", "just having a laugh" or "boys being boys"
- recognise accepting these misconceptions can lead to a culture of unacceptable behaviours and an unsafe environment for children
- will challenge behaviour, which is potentially criminal in nature, such as physical grabbing, e.g. of bottoms, breasts and genitalia, pulling down trousers, flicking bras, lifting up skirts
- recognise that ignoring, dismissing or tolerating such behaviours risks normalising them
- recognise that all of the above can be driven by wider societal factors beyond the school, such as everyday sexist stereotypes and everyday sexist language.

In line with the Sexual Offences Act 2003, sexual violence is:

Rape: a person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: a person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/ his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: a person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Causing someone to engage in sexual activity without consent: a person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not to another, e.g. to vaginal but not anal sex or penetration, with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Further information about consent can be found here: [What is sexual consent? | Rape Crisis England & Wales](#)

Sexual consent:

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Sexual Harassment is unwanted sexual conduct of a sexual nature and can occur on or offline. In the context of this policy, it is child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/ or make them feel intimidated, degraded or humiliated and/ or create a hostile, offensive or sexualised environment.

Sexual harassment can include (*and the list is not exhaustive*):

Offline behaviour

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes. The DSL will consider when any of this crosses a line into sexual violence and the experience of the victim will be taken in account when considering this
- displaying pictures, photos or drawings of a sexual nature.

Online behaviour

This may be standalone, or part of a wider pattern of sexual harassment and/ or sexual violence. It may include:

- consensual and non-consensual sharing of sexual images and videos
- sharing unwanted explicit content
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats.

Upskirting

Upskirting is a criminal offence.

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender or age can be a victim.

Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected, to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

When considering harmful sexual behaviour, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child has a disability or is smaller in stature.

Further information is available here: [Understanding Sexual Behaviour in Children | NSPCC](#)

Responding to Allegations of Child-on-Child Abuse, including sexual violence and sexual harassment between children in the school

We recognise that the initial response to a report from a child is incredibly important and how we respond to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment

to report or come forward. We recognise that where schools do not recognise, acknowledge or understand the scale of harassment and abuse and/ or the downplaying of some behaviours can actually lead to a culture of unacceptable behaviour.

We recognise that it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe, and that a victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment and nor should a victim ever be made to feel ashamed for making a report.

Staff will ensure that children and young people understand that the law is in place to protect them rather than criminalise them. It is recognised that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong.

All staff will follow the Listening to Children and Managing disclosures section of this policy when responding to any concerns raised. All staff will immediately report a concern to the DSL and raise the concern on the safeguarding database.

Everyone in the school recognises the need for sensitivity and proportionality when dealing with these difficult issues.

How we manage these issues:

- we will listen to the wishes of the victim in terms of how they want to proceed
- the DSL will seek appropriate and timely advice wherever necessary and follow the Local Safeguarding Partnership procedures
- the safety and best interests of the victim(s) will be always the paramount consideration
- the DSL will also consider the possibility and take account of any wider and/ or ongoing risk(s) to others
- the needs of the victim and the needs of the alleged perpetrator will be considered separately
- we will safeguard the identified victim and consider, with other agencies: (i) whether the alleged perpetrator seems to pose a risk to any other children; and (ii) how best to manage that risk
- remember that children and young people who abuse others are responsible for their abusive behaviour, and safeguarding action must include addressing their behaviour and its causes
- consider that the alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children
- where necessary, we will participate fully in a co-ordinated approach by other agencies, including Children's Social Care, the Youth Offending Team, education and/ or health agencies
- where the concerns are of a sexual nature, the DSL will consider completing a Risk Management Plan.

Additional considerations for the DSL

Consider:

- the wishes of the victim in terms of how they want to proceed. This recognises that victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support they will be offered
- the wishes of parents/ carers, where the child is not of sufficient age and understanding to make informed decisions around how they want to proceed
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of Harmful Sexual Behaviour
- the ages of children involved
- the developmental stages of the children involved

- any power imbalance by either age (particularly if there is more than 2 years difference or one of the children is pre-pubescent and the other is not) or ability (a younger child can abuse an older child particularly if they have power over them, for example, if the older child has a disability or is smaller in stature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- intra-familial harms and any necessary support for siblings following incidents
- whether the alleged incident is a one off or part of a pattern of concerning behaviour
- any ongoing risks to the child who has been harmed, other pupils or children or members of staff
- any other issues and the wider context.

DSL Actions

Following analysis of all the available information the DSL might:

- refer the matter to Children's Social Care in respect of the victim and alleged perpetrator
- refer the matter to the police
- deal with the matter in school, including providing additional resources through PSHCEE/ RSE
- enable any child involved, who needs it, to access pastoral support
- enable any child involved, who needs it, to access external support as appropriate
- consider the threshold for Children's Social Care, and where it is not met, seek consent for a referral to Early Help
- discuss the matter with the Director/ Lead for Safeguarding with a view to putting in place a Harmful Sexual Behaviour Risk Management Plan
- discuss with the Headteacher, where the alleged incident has taken place in school, sanctions in line with the School's Behaviour, Rewards and Sanctions policy
- discuss with the Headteacher, where the alleged incident has taken place on the way to or from school, any action required to make the area safe.

Toolkits

- [STAR SEND Toolkit | Childnet](#) equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.
- <https://www.childnet.com/resources/just-a-joke/> provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9 - 12 year olds.
- [Step Up, Speak Up! | Childnet](#) a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.
- Preventing Harmful Sexual Behaviour toolkit by the Lucy Faithfull Foundation, [Preventing harmful sexual behaviour in children - Stop It Now](#) the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.
- [HSB framework and audit | NSPCC Learning](#) - an evidence-informed framework for children and young people displaying HSB.
- Contextual Safeguarding – [Beyond Referrals | Contextual Safeguarding](#) resources for addressing Harmful sexual behaviour and extra-familial harm in schools.

Further information is also available at:

Disrespect NoBody Campaign [Disrespect NoBody campaign - GOV.UK \(www.gov.uk\)](#)

LGFL 'Undressed' [Undressed \(lgfl.net\)](http://lgfl.net) provides advice about how to teach young children about being tricked into getting undressed online, in a fun way without scaring them or explaining the motives of sex offenders.

Other sources of support:

Rape Crisis [Rape Crisis England & Wales](http://RapeCrisisEnglandandWales.org.uk)

The Survivors Trust [The Survivors Trust - Rape & Sexual Abuse Services UK](http://TheSurvivorsTrust.org.uk)

Victim Support [Home - Victim Support](http://Home-VictimSupport.org.uk)

Internet Watch Foundation [Eliminating Child Sexual Abuse Online – Internet Watch Foundation \(iwf.org.uk\)](http://EliminatingChildSexualAbuseOnline.org.uk)

NSPCC Report Abuse in Education Helpline: 0800 136 663 - Monday to Friday 08.00 -22.00 and 09.00-18.00 at weekends OR email help@nspcc.org.uk

Where we have concerns relating to child on child abuse, we will follow the Local Safeguarding Partnership procedures - [5.3 Bullying \(proceduresonline.com\)](http://5.3Bullying.proceduresonline.com)

The school will also work within Part 5 of Keeping Children Safe in Education 2024

[Part five: Child-on-child sexual violence and sexual harassment \(keepingchildrensafeineducation.co.uk\)](http://Partfive.Child-on-childsexualviolenceandsexualharassment.keepingchildrensafeineducation.co.uk)

4.12 Children requiring mental health support Inc. self-harm and suicidal ideation:

At The Willows School, we recognise that we have an important role to play in supporting the mental health and well-being of our pupils. We have a mental health practitioner who any child can access when required. We recognise that mental health problems can in some cases be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

We recognise that education settings are in a unique position, as they are able to help identify and prevent mental health problems by promoting resilience as part of an integrated, whole school approach, tailored to the needs of pupils. A whole school approach is one that goes beyond the teaching in the classroom to pervade all aspects of school life, including:

- culture, ethos and environment: the health and well-being of pupils and staff is promoted through the 'hidden' or 'informal' curriculum, including leadership practice, the school's policies, values and attitudes, together with the social and physical environment
- teaching - using the curriculum to develop pupils' knowledge and understanding about health and wellbeing; and
- partnerships with families and the community where we proactively engage with families, outside agencies and the wider community, to promote consistent support for children's health and well-being.

More information can be found at Mental Health and Behaviour in Schools guidance:

[Mental health and behaviour in schools.pdf \(publishing.service.gov.uk\)](http://MentalHealthandBehaviourinSchools.pdf)

Where staff have a mental health concern which is also a safeguarding concern, they must immediately report this to the DSL and follow up this conversation by recording the concern on the safeguarding database. Where the concern they have does not relate to a safeguarding concern, they should discuss with the mental health practitioner in the school.

Self-Harm and Suicidal ideation

Any concerns regarding self-harm or suicidal ideation should be considered under the Local Safeguarding Children's Area Partnership procedures. Some children in 'acute need' may require Child in Need Section 17 support. This could include children who self-harm or disclose an intent to complete suicide.

Broadly defined, self-harm refers to the deliberate attempt to physically injure oneself without causing death. This can include self-mutilation (e.g. cutting behaviours), self-poisoning, burning, scalding, banging, and hair pulling.

Although clearly damaging, alcohol and drugs misuse, eating disorders, unsafe sex and other excessively risky behaviour, such as dangerous driving, are not generally classified as self-harm and would be classed as risk-taking behaviours.

If a child is suspected or found to be self-harming, strategies should be determined by any existing plan, for example, in the child's Placement Plan if a child looked after. If no plan or strategy exists, all reasonable measures should be taken to reduce or prevent continuation of the behaviour. In all cases, consideration will be given to the DSL in conjunction with any clinicians involved with the child, to undertake a Risk Management Plan and to seek advice as appropriate in relation to this. This may include providing additional supervision, minimising access to materials that may be used to self-harm or, as a last resort, use of Physical Intervention, advice to the parent/ carer regarding a GP appointment with a view to a CAMHS referral or where there is an immediate threat to life, calling for assistance from the emergency services.

Where there are concerns about a child expressing intent to complete suicide or take their own life, the DSL will discuss this with an appropriate clinician, who can be sourced by the Company, externally if necessary, and other key professionals around the child, to work together in undertaking appropriate additional risk assessments.

Where we have concerns relating to suicide and self-harm we will follow the Local Safeguarding Partnership procedures for Self-Harm and Suicidal Behaviour [5.40 Self-Harm or Suicidal Ideation \(proceduresonline.com\)](https://www.proceduresonline.com)

4.13 Bullying including online Bullying or cyberbullying:

While bullying between children is not a separate category of abuse, neglect and exploitation, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our Anti-Bullying Policy.

Cyberbullying is the use of mobile phones; instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass threaten or intimidate someone. One of the issues with cyberbullying is the increasingly early access to these technologies.

Examples include:

- encouraging a child to self-harm or end their own life
- setting up false accounts and posting within that online account
- trolling - the sending of messages that are upsetting or menacing via social media
- hacking accounts to embarrass the child or cause trouble for them
- encouraging voting in an abusive poll
- racism, sexism or homophobia
- setting up hate sites or groups in relation to a particular child
- sharing nudes and semi-nudes.

Where we have concerns we will follow the Local Safeguarding Children's Area Partnership procedures relating to bullying [5.3 Bullying \(proceduresonline.com\)](https://www.proceduresonline.com)

4.14 Children who are lesbian, gay, bi or trans (LGBT)

We recognise the fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who do identify as LGBT.

School staff are aware that risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. School staff will endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

4.15 Domestic Abuse

The Domestic Abuse Act 2021 defines Domestic Abuse as Behaviour of a person (“A”) towards another person (“B”) is “domestic abuse” if:

- A and B are each aged 16 or over and are personally connected to each other, and
- the behaviour is abusive.

Behaviour is “abusive” if it consists of any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional or other abuse

It does not matter whether the behaviour consists of a single incident or a course of conduct.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Economic abuse means any behaviour that has a substantial adverse effect on B’s ability to:

- acquire, use or maintain money or other property, or
- obtain goods or services.

Personally Connected means two people are “personally connected” to each other if any of the following applies:

- they are, or have been, married to each other
- they are, or have been in a civil Partnership with each other
- they have agreed to marry one another (even if the agreement has been terminated)
- they have entered into a civil Partnership agreement (even if the agreement has been terminated)
- they are, or have been, in an intimate personal relationship with each other
- they each have, or there has been a time when they each have had, a parental relationship in relation to the same child (this means the person is a parent of the child, or the person has parental responsibility for the child)
- they are relatives.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

We recognise that all children who witness or live in a household where domestic abuse occurs, even if they don't witness it, can be adversely affected by it in the context of their home life where it occurs between family members. Exposure to domestic abuse can have a serious, long lasting emotional and psychological impact on children, In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass provides and advice and helpline for education staff who may be concerned about children who may have experienced domestic abuse **08.00 to 13.00 Monday to Friday 0204 513 9990** (charged at local rate).

Where there are concerns that any young person is a victim of, witness to domestic abuse or is a perpetrator, then we will follow the Local Safeguarding Children's Area Partnership guidance:

[5.16 Domestic Abuse \(proceduresonline.com\)](#)

Further information is available via:

NSPCC: UK domestic-abuse signs symptoms effects [How to Protect Children From Domestic Abuse | NSPCC](#)

Refuge: What is domestic violence/ effects of domestic violence on children [Refuge, the largest UK domestic abuse organisation for women](#)

SafeLives: young people and domestic abuse [Safe Young Lives web.pdf \(safelives.org.uk\)](#)

Domestic abuse: specialist sources of support - GOV.UK [Domestic abuse: specialist sources of support - GOV.UK \(www.gov.uk\)](#)

Teen Safety plan for young people in intimate partner relationships [Teen-Safety-Plan.docx \(live.com\)](#)

Safety plan booklet for primary age children [Resources for Children & Young People | The Wish Centre](#)

[Home : Operation Encompass](#) includes information for schools on the impact of domestic abuse on children.

4.16 Radicalisation and Extremism

The Government definition of **radicalisation is**, "the process by which people come to support terrorism and extremist ideologies associated with terrorist groups".

Extremism is defined as, "vocal or active opposition to fundamental values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". This also includes calling for the death of members of the armed forces.

Terrorism is defined as, "an action that endangers or causes serious violence to a person/people; causes serious damage to property or seriously interferes with or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause".

Prevent is the name given to the Government's strategy to respond to the challenge of extremism; it is part of its broader counter terrorism strategy which is known as **Contest**. Prevent is an integral part of safeguarding in

our school and it is not separate and does not stand alone. For example, we will be mindful of its potential significance in respect of:

- recruitment and selection
- the use of external providers and speakers
- online safety
- the curriculum and our duty to promote and support children's spiritual, moral, social and cultural development.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

Staff will be alert to changes in children's attitudes and/ or behaviour that could indicate that they may be in need of help or protection. School staff will use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the DSL making a Prevent Referral.

Where we have concerns, we will follow them up in line with the Local Safeguarding Children's Area Partnership procedures: [5.36 Radicalisation \(proceduresonline.com\)](#). This will include making referrals to the Channel programme as appropriate.

For further information see:

The Prevent Duty Guidance (Sections 57-76 covers schools) [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](#)

Educate against hate [Educate Against Hate - Prevent Radicalisation & Extremism](#)

The Counter Terrorism and Security Act 2015 places a duty on a number of organisations, including schools, to prevent all radicalisation and extremism. The purpose is to protect children from harm and to ensure that they are taught in a way that is consistent with the law and British values.

To comply with the Prevent Duty:

- we assess the risk of pupils being drawn into radicalisation and develop a Prevent action plan to reduce this risk, which will be signed off by those responsible for school governance
- we will always conduct relevant checks to prohibit extremist speakers and events in the school
- we have put strategies in place to manage access to extremist material.

Our Single point of Contact in the school (SPOC): Rebecca Warhurst

Local Authority Prevent and Channel Team:

Tel: 01254 585 260 Email: Prevent.Team@BLACKBURN.GOV.UK

Police Prevent Team: Tel: 01772 413398 [LANCASHIRE POLICE - Lancashire Constabulary"](#)

Channel Referral Process for Lancashire: [diagram 2 ch.pdf \(proceduresonline.com\)](#)

[Channel and Prevent Multi-Agency Panel \(PMAP\) guidance - GOV.UK \(www.gov.uk\)](#)

4.17 Sharing Nudes and Semi-nudes

The UK Council for Child Internet Safety in their guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people use the term nudes and semi-nudes to mean sending or posting nude or semi-nude images or live streams under the age of 18 offline. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

Where our members of staff have concerns about sharing of nudes or semi-nudes we will follow the UK Council for Internet Safety guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people. [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#)

All concerns regarding sharing of nudes or semi-nudes must be reported to the DSL immediately who will assess the situation on a case-by-case basis using the guidance in sections 1.6(a), 1.6(b) and section 2 of the above guidance to make informed decisions.

As per the above guidance, we recognise that in many cases, we may respond to incidents without involving the police, for example where an incident can be defined as 'experimental' (see section 1.6a) and there is no evidence abusive or aggravating elements and will follow the advice on the circumstances in which this would be appropriate (section 2). Where there are abusive and/ or aggravating factors, incidents will always be referred to the police and/ or Children's Social Care.

Where there is no referral to the police/ CSC, it may be necessary to assist the child/ parents/ carers in reporting it and/ or removing the image from a website or elsewhere.

Help and advice is available via the **Professionals Online Safety Helpline** (Monday to Friday 10am to 4pm)
Email: helpline@saferinternet.org.uk Telephone: 0344 381 4772

Further resources/ support:

Childline/ IWF Report Remove is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online

4.18 Staff dealing with Nudes and Semi-nudes - a quick guide:

Always	Never
General	
Inform the DSL immediately, record the incident, and act in accordance with school online safety and child protection policies and procedures	Ask the child or young person(s) involved to disclose information regarding the imagery View, download or share the imagery yourself (if you have seen it as the child presented it to you – inform your DSL) Inform parents/carers or another member of staff
Explain to the young person that you need to report it and reassure them that they will receive help and support from the DSL	Say or do anything to blame or shame any young people involved Delete it or ask the child to delete it Ask the child to share or download
Confiscate and secure the device(s). Turn the device off and give it to the DSL	View the image, send, share or save the image anywhere, allow pupils to do any of the above
Image has been shared across a school network, a website or a social network:	
Identify the network and report immediately to the DSL	Send or print the image, move the material from one place to another.

The DSL role in searching devices, viewing and deleting imagery

The Education Act 2011 gives schools and/ or teachers the power to seize and search an electronic device if they think there is good reason to do so i.e. if there is reason to believe it contains indecent images or extreme pornography. However, staff should exercise caution and bear the following in mind before searching a device:

- the action must be in accordance with the school’s Safeguarding and Child Protection Policy, related policies and procedures, e.g. IT / Online/ E-Safety, Anti-Bullying, Behaviour, Rewards and Sanctions
- any search can only be conducted following authorisation by the Headteacher.

Imagery will only be viewed by the DSL when it:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent/ carer in making a report
- is unavoidable because a pupil has presented an image directly to the DSL or the imagery has been found on a school device or network.

If it is necessary to view the imagery, then the DSL will:

- never copy, print or share the imagery, as this is illegal
- discuss the decision with the Headteacher
- ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headteacher
- ensure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team. This staff member does not need to view the images.

- wherever possible ensure viewing takes place on school premises, ideally in the Headteacher or a senior leader's office
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- record the viewing of the imagery in the safeguarding records including who was present, why the image was viewed and any subsequent actions.

Deleting Imagery

If the DSL decides that other agencies do not need to be involved, then consideration will be given to deleting the image from the device[s] to limit any further sharing of images. The DSL will record this action with a clear rationale as to why this action was taken.

4.19 Children who are absent from Education

[Working together to improve attendance](#) guidance is now statutory. This means that poor attendance must be treated as a safeguarding concern, and schools must actively engage with children's services where appropriate.

We recognise that children with unexplainable and/ or persistent absences, including being absent for prolonged periods or on repeat occasions, can be vital warning signs that a child is at risk of harm, including a range of safeguarding issues, e.g. neglect, child sexual abuse, exploitation and/ or child criminal exploitation.

We have an emergency contact list for every child, with at least two named people on it. On an annual basis ready for the new school year, we update that contact list by sending out a request pro forma to parents and carers.

We will follow up any unauthorised absence. The initial enquiry will be by 10 am on the first day of non-attendance where there has been no contact from the parent or carer to explain the reason for the absence:

- where it has not been possible to make contact, the other numbers on the contact list will be tried
- where no contact has been made by day 2, the school will conduct an unannounced home visit
- where there is no response on the day 2 home visit, the person undertaking the home visit will make enquiries of neighbours
- further checks including checking with any other known relatives, landlords, private or social housing providers and other local stakeholders who are involved. This will be both via phone and in person
- where a child has been absent and no contact made by day 2, the matter will be recorded on the Safeguarding database as a concern, with a clear chronology of all contacts made with relatives, neighbours, landlords and other local stakeholders
- if there is reason to believe a child is in immediate danger or at risk of harm, a referral will be made to children's social care and the police as appropriate.

Where a parent is refusing to send their child back to the school or a children's home, we will undertake home visits in accordance with our Attendance Policy. Where geographical distance prevents this, this will be undertaken by online Teams calls. This action is in direct response to our duty of care to any child who is on roll of the school.

For children looked after (CLA/ LAC), where a child is known to be missing from care or has failed to return from family time, we will liaise with the children's home Manager and where appropriate, will undertake visits to the home in accordance with the Attendance policy.

Our school will follow the relevant Local Authority agreement for reporting for children who fail to attend without the Headteacher's permission for a period of 10 days or more or who regularly fail to attend.

Where children are involved with the court system: the updated guidance directs schools to two guides that support children in the court system, one for 5 to 11 year olds (HM Courts and Tribunals Service, 2017a) and the other for 12 to 17 year olds (HM Courts and Tribunals Service, 2017b).

4.20 Further information and resources – Specific Circumstances

For links to further information and resources in relation to Children in Specific Circumstances, please go to page 160 of Keeping Children Safe in Education 2024: [Keeping Children Safe in Education 2024](#)

5.0 CHILDREN LOOKED AFTER AND THOSE WITH SEN/ ADDITIONAL NEEDS

5.1 Children Looked After (CLA/LAC) and previously looked after

Children who have suffered adversity via abuse, neglect and exploitation can end up being looked after by the Local Authority. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

The Designated Safeguarding Lead must be aware of the child's:

- legal status
- the name of the commissioning LA Virtual Headteacher
- contact arrangements and any restrictions around contact
- who is allowed to have information beyond educational achievement information
- manage sensitive/ confidential information in line with the child's best interests, wishes and feelings
- where children are care leavers, the DSL will have details of the LA personal advisor and liaise with them as necessary.

The Designated Teacher is responsible for:

- promoting education achievement of children who are looked after and previously looked after
- ensuring that records and plans in respect of children who are looked after are generated, maintained, updated and effective in line with national requirements and local protocols e.g. PEPs
- providing appropriate information to the DSL
- managing sensitive/ confidential information in line with the child's best interests, wishes and feelings.

In our school the Designated Teacher is: Rebecca Warhurst

5.2 Virtual School Heads / Children in Kinship Care. Children with a Social Worker

The school will identify pupils who are looked after, have a social worker, or are in kinship care, and track their progress and wellbeing.

Relevant staff will work with the Virtual School Head, local authority, and other agencies to ensure educational outcomes for these pupils are promoted in line with statutory expectations.

Paragraph 199 of KCSIE has been amended to clarify that from September 2024, the role of Virtual School Heads was further extended to include a non-statutory responsibility to promote the educational achievement of all children in kinship care. Non-statutory guidance on "Promoting the education of children with a social worker and children in kinship care arrangements" contains further information on the roles and responsibilities of Virtual School Heads.

5.3 Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges both in relation to their vulnerability to possible abuse, neglect and exploitation. Research tells us that they are three times as likely to be abused than a child without a learning difficulty, special need or disability. There might also be vulnerability in terms of ability to report such incidents.

We recognise that additional barriers can exist when identifying abuse, neglect and exploitation for this group of children. In our school we always consider the possibility of abuse particularly relating to this group of children and do not automatically assume that attitude, behaviour, mood or injury relate to the child's difficulties or disability. We recognise that children with SEND can be disproportionately impacted by such issues as bullying, without showing any outward sign and there may be communication barriers and difficulties in managing and reporting these challenges.

We also recognise that as with all children, it is not just the overt signs of abuse that will be looked for, but we will be mindful at all times of the possibility of more subtle signs that may indicate a wider range of safeguarding issues such as emotional abuse due to ridicule, financial abuse, perplexing presentations (PP)/ Fabricated or Induced Illness (FI).

Our staff work hard to give all children opportunities and a voice, and we provide support for pupils at any time.

The school adopts inclusive and sensitive language in all written and spoken communication.

Where terms such as "autism spectrum disorder" occur, we will instead use "autism" in accordance with current SEND guidance.

We will use terms such as "victim" or "alleged perpetrator" appropriately, being sensitive to the wishes of the child and context, and avoid assumptions.

Our staff will always consider:

- what do I know about this child?
- What is their developmental age and level of understanding?
- How do any additional needs impact on their development?
- How do I need to adapt my communication to meet the needs of the child?

Our DSL and staff team liaise on a regular basis and as soon as there are any safeguarding issues identified. The DSL will make decisions in line with local thresholds guidance as to what action is taken.

This is a specialist, independent special school, and all pupils should have an EHCP. The Headteacher coordinates SEND. Annual Reviews will be attended by a staff member who knows a child well.

Links to NSPCC advise on how to support Deaf and Disabled children and young people: [Safeguarding d/Deaf and disabled children and young people | NSPCC Learning](#)

5.4 Children's Homes

Research has shown that children can be particularly vulnerable in residential settings. Some of our pupils live in residential children's homes and our staff team have an effective, professional relationship with staff at all homes. Homes are inspected regularly, and children have access to independent visitors and/ or advocates.

6.0: STEPS TO SECURE A SAFER SCHOOL

6.1 Safer Recruitment

All staff, volunteers, governors, contractors, and those working in alternative provision will undergo safer recruitment checks and processes in line with Keeping Children Safe in Education (KCSIE) 2025, Part 3. This includes verification of identity, references, and enhanced DBS checks, with additional checks as required for individuals carrying out regulated activity.

Our Staff Behaviour Policy / Code of Conduct sets out clear expectations for all adults working in or on behalf of the school. It includes guidance on:

- raising and responding to low-level concerns.
- managing allegations against staff, including those relating to online conduct.
- safe and appropriate use of technology, personal devices, and social media.
- professional boundaries and respectful, inclusive language in all interactions.

The school has robust filtering and monitoring arrangements for the use of technology and ensures that responsibilities for reviewing and overseeing these systems are clearly assigned and regularly evaluated in line with DfE expectations.

Where safeguarding thresholds are met, the school will make referrals to the Disclosure and Barring Service (DBS), and, when required, to the Teaching Regulation Agency (TRA).

The governing body are responsible for ensuring that:

- safer recruitment practices are fully embedded and consistently applied.
- effective oversight of filtering and monitoring systems is maintained, with regular reviews to ensure compliance and effectiveness.
- the Staff Behaviour Policy / Code of Conduct is up to date, implemented, and understood by all staff and volunteers.
- appropriate action is taken when concerns or allegations arise, in line with statutory guidance

6.2 Staff Training and Induction

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff will receive a safeguarding briefing delivered by the DSL or Deputy DSL on day one. This includes highlighting our school's Safeguarding and Child Protection Policy, the staff Code of Conduct, the Behaviour, Rewards and Sanctions Policy, the safeguarding arrangements for children who go missing from education, reporting and recording arrangements, the guidance for Safer Working Practice for those who work in Education settings 2022.

Supply staff and volunteers will be told who the DSL and Deputy DSL are, given a copy of a summary guide to safeguarding and will be informed of the reporting and recording process in the school. They will be given a copy of the reporting concerns pro forma as well as the policies listed above, as given to all permanent staff.

All staff, including the Headteacher will receive training that is regularly updated; this includes annual refresher training, safeguarding and child protection updates via email, e-bulletins and staff meetings throughout the year.

The DSL and any deputies will update their knowledge and skills on an annual basis via attending meetings with other DSLs, reading or undertaking additional training, this is in addition to any Branches Education Group required learning and the two year DSL refresher training.

6.3 Whistleblowing if you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a child or young person can be placed in a very difficult situation. They may worry that they have misunderstood the situation, and they may wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child or young person is paramount. Branches Education Group have a Whistleblowing Policy which enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Headteacher immediately. Complaints about the Headteacher should be reported to the Governance Chair. Staff may also report their concerns directly to Children's Social Care or the police if they believe direct reporting is necessary to secure action.

6.4 Concerns about the behaviour and/or conduct of adults

Adult concerns will fall into two categories, and that will be determined by the Headteacher as the case manager. Those two categories are either an allegation or a low level concern.

To create a culture of open, honest and transparent practice, staff are encouraged to self-report.

All staff who have any concerns about a colleague or anyone working on behalf of Branches Education Group have a duty to act on that concern.

Any concern that would be deemed an allegation as per the Allegations against Staff policy must be reported immediately to the Headteacher, where the concern is about the Headteacher, it is reported to the Governance Chair

Any concern that is a behaviour that is not consistent with the Code of Conduct or the Guidance for Safer Working Practice, comes under the Low Level Concern procedure and must be reported to the Headteacher immediately. Where the concern is about the Headteacher, it is reported to the Governance Chair.

All reported concerns must be recorded as an employee concern ('other adult concern' for supply/ agency staff) on the safeguarding database before the end of the member of staff's working day on the day it was reported.

6.5 Management of Allegations

As per section one in part 4 of Keeping Children Safe in Education 2024, the Allegations against Staff Policy details the full procedures in relation to the management of allegations that might indicate that a person would pose a risk of harm if they continued to work in regular or close contact with children in their present position,

or in any capacity with children in the school. These procedures will be followed where it is alleged that anyone working in the school, including supply staff and volunteers has:

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

Any allegations against a member of staff will be reported to the Headteacher immediately. Where the allegation relates to the Headteacher, they will report it to the Governance Chair immediately. Where staff have concerns about the conduct of a member of staff in the school, they will report this immediately.

The harm test is explained here: [Making barring referrals to the DBS - GOV.UK \(www.gov.uk\)](https://www.gov.uk/making-barring-referrals-to-the-dbs)

The person to whom they have reported it, becomes the 'Case Manager'. Where allegations/ concerns do not meet the harm threshold, the Case Manager will follow the section describing the procedures for this in the school's Allegations against Staff policy if an allegation is substantiated and:

- the member of staff is dismissed; resigns, or otherwise ceases to provide his or her services; or
- the employer ceases to use the person services.

The case manager will discuss with the LADO and make a referral to the DBS with the support of our H.R. Team.

Where it is a member of teaching staff, then the case manager will consider a referral to TRA.

The Lancashire LADO is:

Mr Tim Booth Phone: 01772 536694. Email: tim.booth@lancashire.gov.uk

Address: Safeguarding Unit, Room B16 County Hall, Fishergate Hill Preston, PR1 8RJ

Parents or carers of a child or children involved should be:

- formally told about the allegation as soon as possible, and the case manager will consult with the LADO, police and Children's social care (where police/ CSC are involved) on what information can be disclosed.
- kept informed of the progress of the case, only in relation to their child. No information can be shared regarding the member of staff.
- made aware of the requirements to maintain confidentiality about any allegations made against teachers in school whilst investigations are in progress as set out in s141F of the Education Act 2002.

If parents or carers wish to apply to the court to have reporting restrictions removed, they will be advised to seek legal advice. [KCSIE 2024 paragraph 400, p100]. The school will follow the Local Safeguarding Children's Area Partnership procedures management of allegations procedures:

Allegations Against Persons who Work with Children [6.4 Allegations Against Staff or Volunteers \(proceduresonline.com\)](https://www.proceduresonline.com/6-4-allegations-against-staff-or-volunteers)

Please see the **Allegations Against Staff Policy**.

6.6 Low Level Concerns

As per section two in part 4 of Keeping Children Safe in Education 2024, all staff in the school recognise the importance of sharing low level concerns. A Low Level Concern is when any adult working in the school or on behalf of the school may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and

- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

The purpose of our procedures for managing Low Level Concern is to create and embed a culture of openness, trust and transparency in which the company values and expected behaviours, as set out in the Code of Conduct is lived, monitored and reinforced by all staff.

For more detail about our procedures for managing Low Level Concerns, please see the **Allegations Against Staff Policy**.

6.7 Reasonable Force and Injuries Caused Whilst Using Restrictive Physical Interventions

The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children to keep them or others safe. This can range from guiding a child to safety by the arm, to more extreme circumstance such as breaking up a fight, or where a young person needs to be restrained to prevent violence or injury. The use of force may involve passive physical contact, such as standing between pupils or blocking a pupils' path. It might involve active physical contact such as a hold.

The decision on whether to use reasonable force to control or restrain a child is a matter for the professional judgement of the staff concerned. It should always depend on individual circumstances and be proportionate

There are circumstances when it is appropriate for staff in schools to use reasonable force to safeguard pupils from harm to others, harm to themselves or serious damage to property. The use of reasonable force should always be:

- a last resort. Staff are trained in and should use appropriate de-escalation strategies first
- any force used must be the minimum necessary to make a situation or pupil safe
- the staff members response should be proportionate to any risk involved
- any and all incidents and physical interventions, restrictive or otherwise, must be recorded.

Injures resulting from use of reasonable force/ restrictive physical intervention

On rare occasions children and young people or staff might be injured during the use of reasonable force/ restrictive physical intervention. This can occur even when appropriate techniques are being used.

Where minor injuries such as bruising or scratches have occurred, these will all be recorded and referred to the Headteacher, who will use their professional judgement in determining whether the injury warrants referral to the Local Authority Designated Officer (LADO). They will consider how the injuries occurred and if someone has raised a concern or complaint about how the restraint was applied.

A cause for concern that will warrant a consultation with LADO would be if patterns emerge whereby the same staff member is involved where there are complaints, similar injuries, or the same child, for example.

If any doubt exists regarding whether the injury has reached the threshold or criteria for referral, then the Headteacher will use the Local Safeguarding Children's Area Partnership threshold guidance and if necessary, seek advice from the Director. They can also seek a consultation with the Local Authority Designated Officer.

The Headteacher should always have a consultation with/ make a referral to the LADO where any of the following criteria applies:

- the child or young person receives an injury that is more serious than very minor bruising or abrasions that have arisen accidentally from properly used physical restraint
- the child or young person wishes to complain about the manner in which they have been restrained

- the parent/ carer/ social worker of a child or another young person makes a complaint about the use of restrictive physical intervention.

Further information: [Use of reasonable force in schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/use-of-reasonable-force-in-schools)

6.7i Recording and Reporting of Restrictive Interventions

Following the Department for Education (DfE) consultation on the use of reasonable force and other restrictive interventions, new regulations and statutory duties apply to all schools in England from 1 April 2026.

The Willows School complies with the schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025, together with amendments to the Education and Inspections Act 2006, as reflected in the Independent School Standards. These requirements sit alongside existing legal powers to use reasonable force.

The school also follows the DfE guidance “Restrictive interventions, including the use of reasonable force, in schools”. The sections relating to the recording and reporting of incidents are statutory and must be followed.

Scope

At The Willows School, these duties apply to all incidents involving:

- The use of reasonable force
- Seclusion
- Restraint, including non-force related restraint

The use of restrictive interventions is treated as a safeguarding matter and is subject to appropriate senior leadership oversight.

Recording of Incidents

The Willows School has procedures in place to ensure that each significant incident involving reasonable force, seclusion or restraint is recorded in writing as soon as practicable and no later than the same day.

As a minimum, records will include:

- The name of the pupil and member(s) of staff involved
- The pupil’s relevant needs or circumstances, including SEND where applicable
- The date, time, location and approximate duration of the incident
- A factual account of what happened, why the intervention was considered necessary, and what prevention or de-escalation strategies were attempted first
- The type and degree of force used, where applicable
- Details of any injuries sustained and any follow-up or post-incident support provided

Records are stored securely and reviewed as part of The Willows School’s safeguarding and behaviour monitoring processes.

See Appendix 8.

Reporting to Parents

At The Willows School, parents will be provided with written information about any incident involving reasonable force, seclusion or restraint on the same day wherever possible.

This duty applies even where restrictive interventions form part of an agreed behaviour support plan for the pupil.

Reports to parents will include, as a minimum:

- When and where the incident took place and how long it lasted
- Why the intervention was considered necessary
- The type and degree of force used, if applicable
- Details of any injuries sustained and any follow-up support provided

Where appropriate, parents will be invited to discuss the incident and any subsequent actions or support.

Safeguarding, SEND and Prevention

In line with the updated DfE guidance, The Willows School places a strong emphasis on:

- Prevention and de-escalation
- Minimising the need for restrictive interventions
- Careful consideration of SEND, vulnerability and individual pupil needs
- Clear leadership oversight and appropriate staff training

Risk assessments and behaviour support plans are used where there is an identified likelihood of restrictive interventions being required

6.8 Abuse of Position of Trust

All school staff are aware that inappropriate behaviour towards children and young people is unacceptable and that their conduct towards children and young people must be beyond reproach.

Staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a child or young person under 18 may be a criminal offence, even if that child or young person is over the age of consent.

The Staff Code of Conduct and Social Media Policy makes clear our expectations of staff including where their relationships and associations both within and outside of the school, including online may have implications for the safeguarding of children in the school.

6.9 Online Safety and Technology Management

Safeguarding in the digital world has taken a significant step forward. KCSIE 2025 now explicitly includes misinformation, disinformation (including fake news), and conspiracy theories within its definition of online content that could cause harm.

To improve cybersecurity in education, the DfE has released tools and guidance to help school leaders enforce protocols to keep children safe online:

[Plan technology for your school](#) - schools can self-assess their filtering and monitoring systems.

[Guidance for applying filtering and monitoring rules to AI tools](#) - part of the DfE's Generative AI: Product Safety Expectations (Jan 2025).

Reinforcement of the [Cyber security standards for schools and colleges](#) – encourages leaders to audit and strengthen digital resilience.

Online Safety and Digital Risk

In recent years, the use of technology has grown significantly, and in our school we recognise that this is a central component of safeguarding. Technology plays a vital role in learning and offers many opportunities for children and young people, but it also brings potential risks.

We acknowledge four key areas of online risk, often referred to as the “four Cs”:

- Content: being exposed to illegal, inappropriate or harmful material. For example, pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation or extremism, as well as *misinformation, disinformation and conspiracy theories*.
 - *Disinformation is the deliberate creation and spread of false or mis leading content, such as fake news.*
 - *Misinformation is the intentional spread of this false or mis leading content. (Cabinet Office, Department for Science Innovation and Technology 2023)*
- Contact: being subjected to harmful online interaction with other users. For example, peer pressure, commercial advertising, and adults posing as children or young people with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (including consensual and non-consensual sharing of nudes, semi-nudes and pornography), sharing other explicit images, and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and financial scams. Where pupils or staff are at risk, we will report concerns through appropriate channels, including the Anti-Phishing Working Group.

As a school, we adopt a proportionate and proactive approach to managing online safety. We:

- maintain an Online/E-Safety Policy that is reviewed annually and reflects current DfE statutory guidance (*Keeping Children Safe in Education 2025*);
- provide guidance and support to children and parents about both new and existing technology, including signposting to appropriate sources of advice;
- empower children and parents to make safe and informed choices in their online lives;
- ensure all users sign the Acceptable Use Agreement on an annual basis;
- make sure parents and children know how to minimise online risks and report concerns or worries to staff in school;

- have effective filtering and monitoring systems in place, which are reviewed regularly to ensure they remain robust and appropriate.

Use of Artificial Intelligence, Cyber Standards, and Misinformation

The school recognises that digital technologies, including artificial intelligence (AI), present both opportunities and risks for learners. To safeguard children:

- **AI and Digital Tools:** Any AI or digital platform used within the school will be vetted to ensure it is age-appropriate, safe, and aligns with the school's safeguarding standards. Staff will supervise and guide students in responsible use.
- **Cybersecurity Standards:** All devices, platforms, and online resources used by students will comply with recognised cybersecurity standards. Regular audits and software updates will be conducted to minimise risks.
- **Misinformation Awareness:** Students will be taught to recognise and critically evaluate misinformation, with staff actively monitoring online content accessed through school devices.
- **Monitoring and Reporting:** Staff will monitor AI and internet use to detect inappropriate content or behaviour. Any concerns will be logged and addressed through the school's safeguarding procedures.

This approach ensures that while children benefit from emerging technologies, their safety, privacy, and well-being remain paramount.

Filtering and Monitoring Systems

Filtering Systems: Branches Education Group use the services of SafetyNet to filter all devices connected to our network. This filters inappropriate websites and subject/ word categories, meaning that the system can block out age-inappropriate content. SafetyNet will generate an email alert to the Headteacher, DSL and Deputy DSL advising them of any attempt to access inappropriate material or a blocked site.

Monitoring Systems: Branches Education Group use SafetyNet to monitor children's online behaviour, this works via proactively monitoring PC, Chromebook, tablet or laptop usage only. SafetyNet detects and reports on deemed 'threat' or 'critical', generating an email alert to the Headteacher, DSL or Deputy DSL within 15 minutes.

Assigned roles

We recognise that filtering and monitoring systems are not able to detect everything, therefore all staff will be vigilant when children are using any devices within the school setting and will take appropriate action if they have any concerns around observed online behaviour, this will include as appropriate, reporting it to the DSL and recording any concerns as a concern in the safeguarding database.

It is the responsibility of the DSL or Deputy DSL to respond to any alert generated or received, under the oversight of the Headteacher. They will check any alerts generated about violations or attempts to bypass filtering systems.

IT Technicians can support with any issues or concerns. They will advise on how to review and filter, as well as monitor provision. Where any member of staff has a concern about the content of a site that a child has accessed (this can happen due to sites not being categorised), then this must be immediately reported to the DSL and a concern must be raised. The DSL will immediately notify the IT Team at Head Office. The email

generated must contain in the subject WEBSITE BLOCK. A Technician will then review and block accordingly. The DSL will update the IT team with any further issues.

Further information is available via:

[Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#)

[Appropriate Filtering and Monitoring - UK Safer Internet Centre](#)

[Safety and Security Online | SWGfl](#)

Mobile Phones in school

Whilst at the school, pupils are not allowed mobile phones or devices during the school day, this therefore reduces any risk of using mobile data via 3, 4 or 5G to bully, sexually harass, and control others via mobile or smart technology, share indecent images; consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

Where pupils do bring their phones to school, they are handed in and kept by Tutors in a locked container until handed back to the pupil at the end of the school day.

6.10 Cybercrime

Cybercrime is criminal activity committed using computers and/ or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interests in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. Where there are concerns about a child in this area, the DSL or Deputy DSL will consider referring into the **Cyber Choices programme**. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

The Cyber Choices programme does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, when-to-call-the-police—guidance for-schools-and-colleges.pdf (npcc.police.uk) and National Cyber Security Centre - NCSC.GOV.UK [Cyber Choices - National Crime Agency](#)

Where we have concerns about online safety we will follow the Local Safeguarding Children's Area Partnership procedures E-Safety: [5.33 Online Safeguarding \(proceduresonline.com\)](https://www.proceduresonline.com/5.33-Online-Safeguarding)

Further support with online safety is available via:

- Education for a Connected World - [Education for a Connected World - GOV.UK \(www.gov.uk\)](https://www.gov.uk/education-for-a-connected-world)
- Be Internet Legends [Be Internet Legends - A Program to Teach Children Internet Safety \(beinternetawesome.withgoogle.com\)](https://www.beinternetawesome.withgoogle.com/)
- Thinkuknow - National Crime Agency/CEOPs [CEOP Education \(thinkuknow.co.uk\)](https://www.thinkuknow.co.uk/ceop-education/)
- Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support. [Harmful online challenges and online hoaxes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/harmful-online-challenges-and-online-hoaxes/)

6.11 Education at home

As a school, we recognise that there may be times where our pupils are asked to learn or undertake research online at home. The following advice is available in relation to this; [Safeguarding and remote education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/safeguarding-and-remote-education)

The following provide helpful advice:

- NSPCC Learning - Undertaking remote teaching safely [Photographing and filming children | Images guidance | NSPCC Learning](https://www.nspcc.org.uk/learning/photographing-and-filming-children-images-guidance/)
- Get help with remote education [Get help with remote education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/get-help-with-remote-education)

Where we have concerns about online safety we will follow the Local Safeguarding Partnership procedures E-Safety: Children Exposed to Abuse through the Digital Media [e safety policy and guidance.pdf \(proceduresonline.com\)](https://www.proceduresonline.com/e-safety-policy-and-guidance.pdf)

Where we are asking children to undertake work online, we will make parents/ carers aware of what their child is being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) the child is going to be interacting with online.

Further resources to support schools with online safety are available via:

- Teaching online safety in school - DfE guidance supporting schools to teach pupils how to stay safe online when studying. [Teaching online safety in schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/teaching-online-safety-in-schools)
- Education for a Connected World - [Education for a Connected World - GOV.UK \(www.gov.uk\)](https://www.gov.uk/education-for-a-connected-world)
- Guidance from the PSHCEE Association [PSHCEE Association | Charity and membership body for PSHCEE education \(PSHCEE-association.org.uk\)](https://www.pshcee-association.org.uk/)

- Be Internet Legends - Parent Zone and Google
- Thinkuknow - National Crime Agency/CEOPs [Be Internet Legends - A Program to Teach Children Internet Safety \(beinternetawesome.withgoogle.com\)](https://www.thinkuknow.com)
- UK Safer Internet Centre - guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum. [Homepage - UK Safer Internet Centre](https://www.saferinternet.org.uk)
- Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.
[Harmful online challenges and online hoaxes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/harmful-online-challenges-and-online-hoaxes)

6.12 Alternative Provisions (AP)

Where pupils are placed in alternative provision, the school will ensure that contracts/agreements with AP providers make clear the safeguarding responsibilities, safer recruitment requirements, and arrangements for oversight and monitoring.

The school will verify that staff (including those in AP) have undergone proper checks (DBS, identity, references) as per the school's safer recruitment policy.

Regular reviews of the placement will be undertaken to ensure safeguarding arrangements are robust and being honoured.

The school requires all alternative provision (AP) providers to provide written confirmation of their safeguarding arrangements before any placement begins. The school will also conduct regular review visits to AP providers, at a frequency determined by risk assessment and best practice, to ensure ongoing compliance with safeguarding standards and to monitor the safety and welfare of all pupils placed off-site. Any concerns identified during these visits will be reported, recorded, and acted upon promptly in line with the school's safeguarding procedures.

School will gain written confirmation from the alternative provider that appropriate staff safeguarding checks have been carried out, as well as written information about any arrangements that may put the child at risk

- have records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend
- regularly review any alternative provision placements to make sure the placement continues to be safe and meets the child's needs. If safeguarding concerns occur, the placement should be immediately reviewed and ended if necessary.

6.13 Helping children and young people to keep themselves safe

Children and young people are taught to understand and manage risk via the curriculum and pastoral care. Our approach is designed to help children and young people to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed.

Discussions about risk are empowering and enabling for all children and young people and promote sensible behaviour rather than fear or anxiety. Children and young people are taught how to conduct themselves and how to behave in a responsible manner; this includes being taught to keep themselves safe online. Children and young people are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures.

As a school we will continually promote an ethos of respect for children and young people, and they are continually encouraged to speak to a member of staff of their choosing about any worries they may have.

7.0 REFERENCES

- DfE (2015) 'What to do if You're Worried a Child is Being Abused' – Advice for Practitioners
- DfE (2017) 'Child Sexual Exploitation' – Definition and a Guide
- DfE (2022) Guidance for Safer Working Practice for those working with children and young people in education settings
- DfE (2018) 'Information Sharing' - Advice for Practitioners providing safeguarding services to children, young people, parents and carers
- DfE (2023) 'Working Together to Safeguard Children'
- DfE (2024) 'Keeping Children Safe in Education'
- DfE (2021) 'Teachers' Standards'
- DfE (2022) 'Recruit Teachers from Overseas'
- DfE (2022) 'Working Together to Improve School Attendance'
- DfE (2016) 'Children Missing Education'
- DfE (2015) 'The Prevent Duty - Departmental Advice for Schools and Childcare Providers'
- HM Gov (2020) 'Multi-Agency Practice Guidelines: Female Genital Mutilation'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'
- The Data Protection Act (2018)

8.0 APPENDICES

Appendix 1 – Safeguarding Recording Form - CPOMS

Appendix 2 – Body Map Guidance and Templates

Appendix 3 – Quick Links to online manual/ portal: Lancashire Children’s Safeguarding Assurance Partnership

Appendix 4 – Listening and Recording

Appendix 5 – Definitions of Child Abuse, Neglect and Exploitation

Appendix 6 – Indicators of Child Abuse, Neglect and Exploitation

Appendix 1 – Safeguarding Recording Form – CPOMS

Microphone | Blank Screen | Back

+ Add Incident

Student

Begin typing a student's name

Report

Attendance Behaviour Cause for Concern Child Protection Contact with External Agency Contact with Parents Friendship Related Issues Medical Mental Health and Wellbeing Peer on Peer
 Safeguarding Concern SEND Sexual Harassment

Lead student(s)

Begin typing a student's name

Type a student's name to link them to this incident

CA

21/11/2024 12:04

Active

Monitoring will end if you select 'No Further Action'

Sign to

Begin typing a staff member's name

Click to browse or drag a file to upload

Staff Members

Begin typing a staff member's name

All Staff

Type a colleague's name or select an staff group to alert them to this incident. Colleagues highlighted in red would not normally be able to view this incident.

Emergency Involved

Submit Incident

Appendix 2 - Body Map Guidance and Templates

Body Maps should be used to document all signs of harm and physical injuries.

Use a black pen. Do not use correction fluid or other type of eraser.

Record the date and time of the observations. State your name and role.

Do not remove the child's clothing for the purposes of examination, unless the injury site is already visible due to being treated by a First Aider/ responder.

- **Never take photographs** as evidence of any injuries or marks to a child.
- **Use the Body Map forms** below.
- **All concerns should be reported to the DSL and recorded without delay.**
- **The DSL will contact appropriate safeguarding services**, e.g. Social Care direct or child's Social Worker if already an open case to social care.

When you notice an injury to a child, record the information below for every mark you see, e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns.

Give detail about:

- exact site of injury on the body, e.g. upper outer arm/ left cheek;
- size of injury - in centimetres or inches;
- shape of injury, e.g. round/ square/ straight line;
- colour of injury - if more than one colour, say so.
- any broken skin?
- any swelling at the site of the injury, or elsewhere?
- any scab/ blistering/ bleeding?
- if the injury is clean or if there is dirt/ grit/ fluff etc.
- any restricted mobility due to the injury
- whether the site of the injury feels hot
- if the child feels hot
- if the child is in pain
- if the child's body shape has changed/ are they holding themselves differently?

Add any further information as required.

Ensure First Aid is provided where required and record this.

Complete an Accident Form as appropriate.

A copy of the body map should be given to the DSL/ kept on the child's safeguarding/ confidential file.

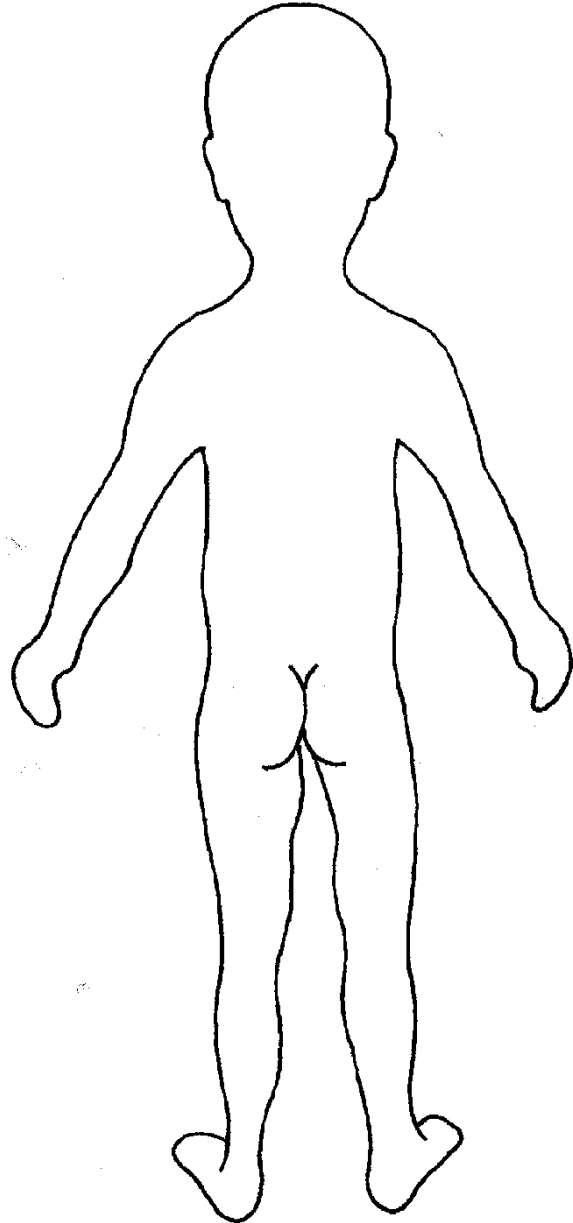
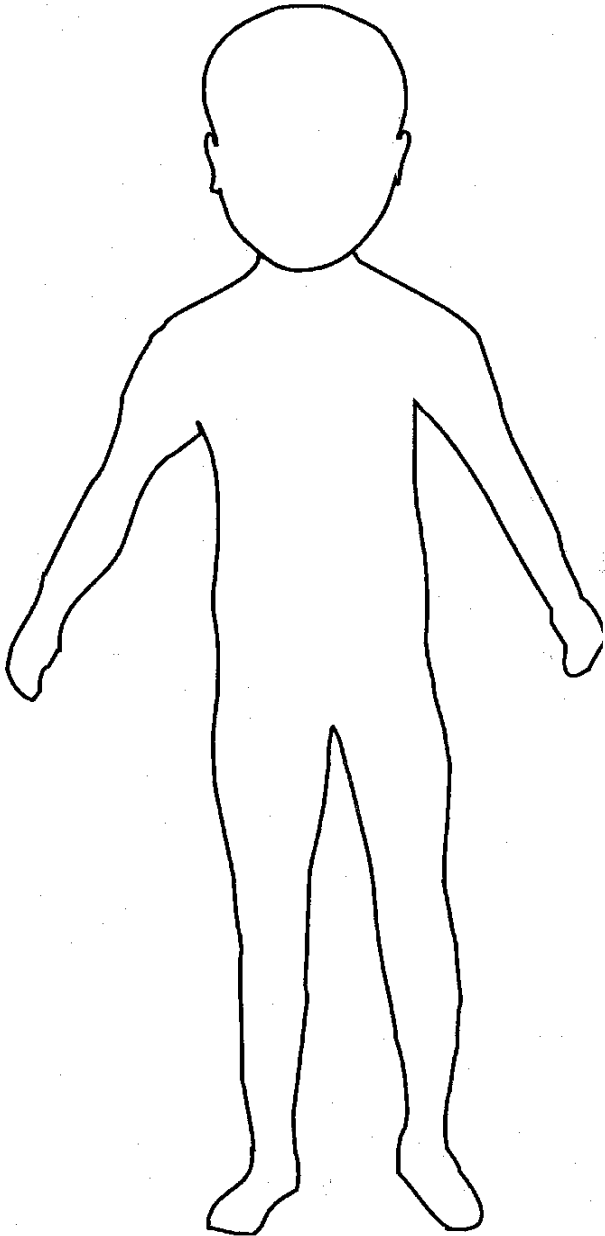
BODY MAP 1- Full body

(This must be completed at time of observation)

Name of Pupil: _____ Date of Birth: _____

Name of Staff: _____ Job title: _____

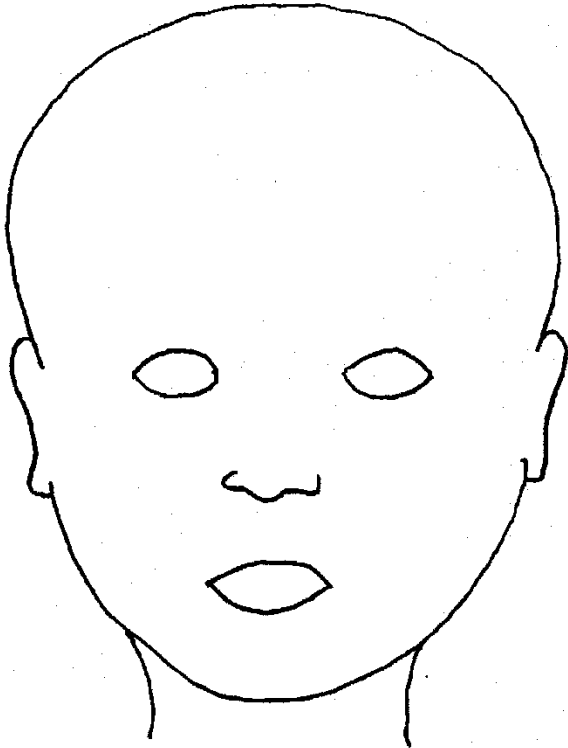
Date and time of observation: _____



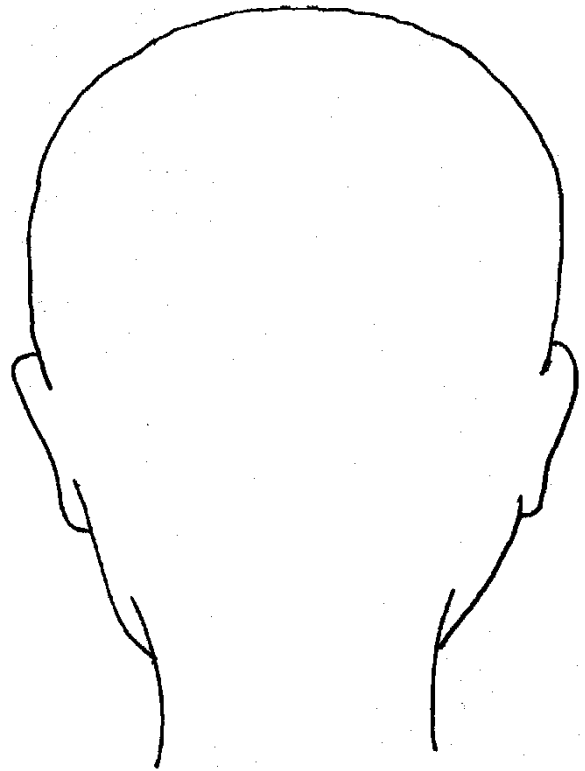
BODY MAP 2 – Face and Head

Name of pupil:

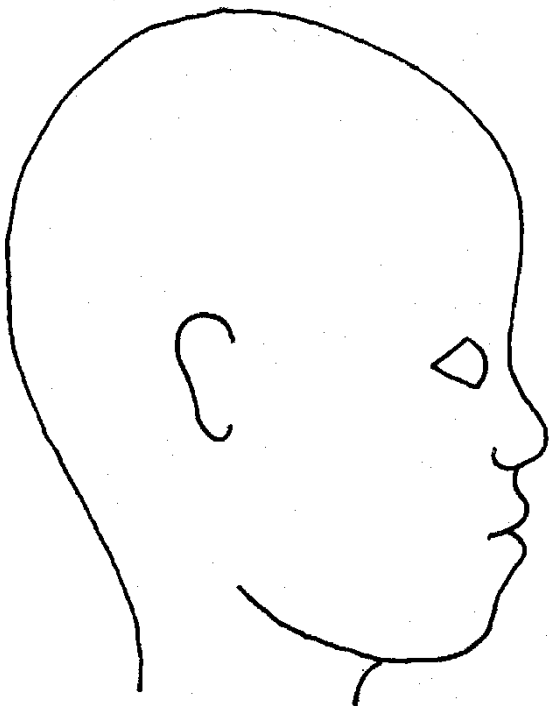
Date and time of observation:



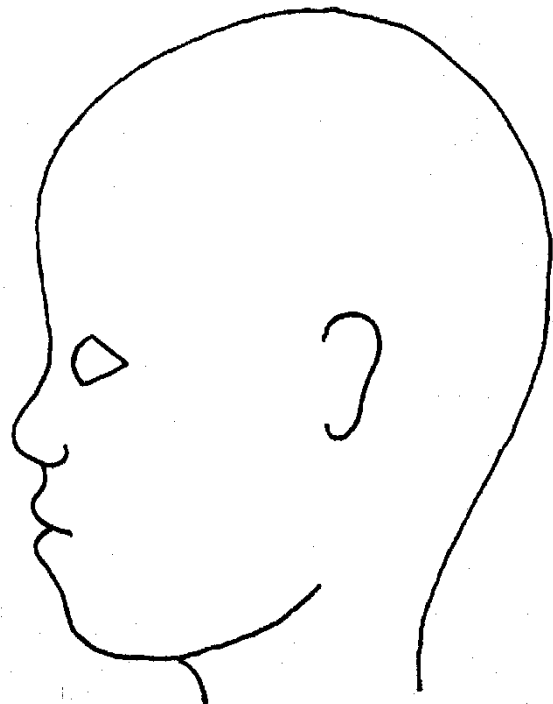
FRONT



BACK



RIGHT

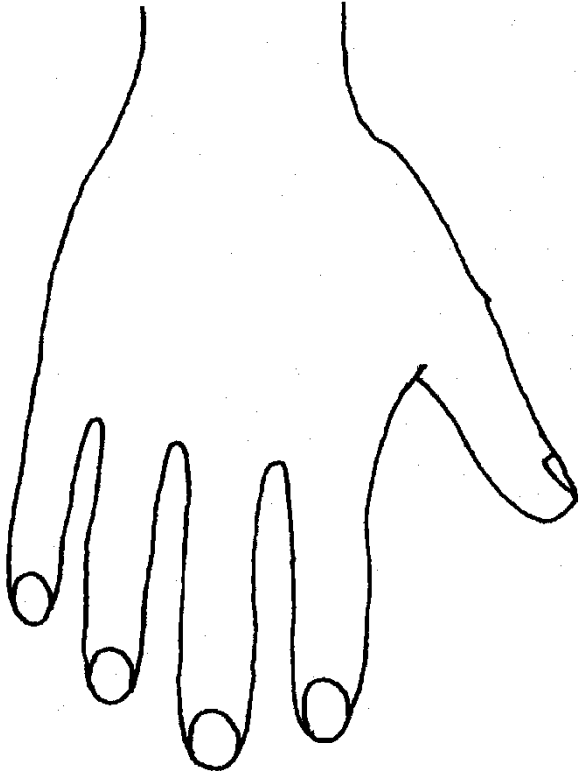


LEFT

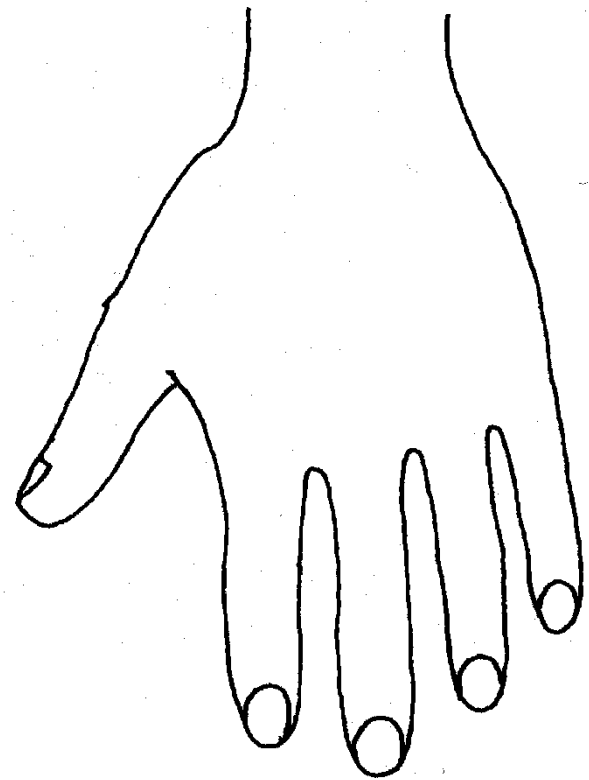
BODY MAP 3 – Hands

Name of pupil:

Date and time of observation:

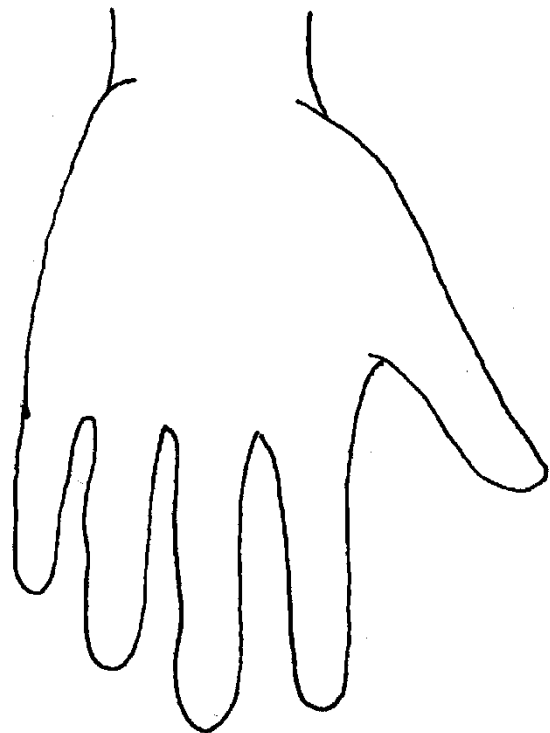
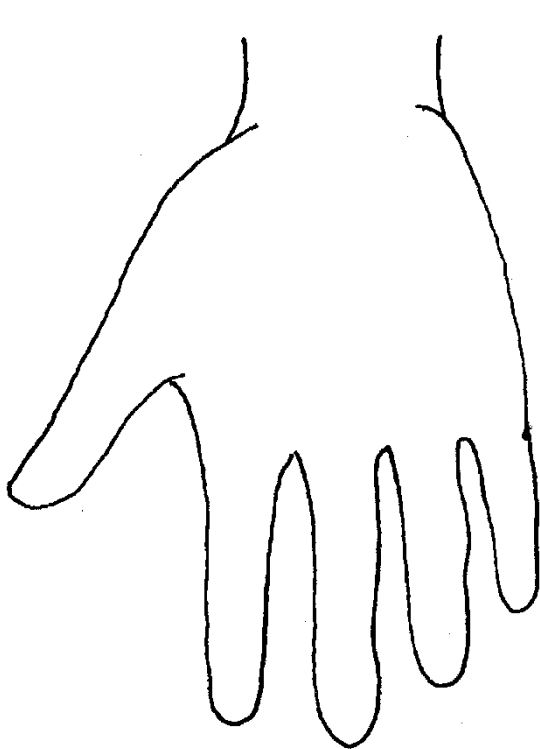


R



L

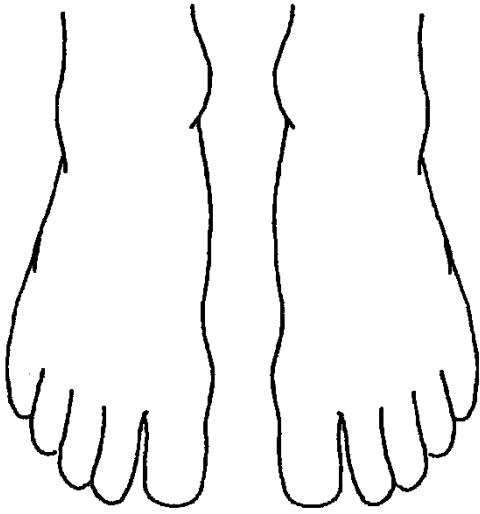
BACK



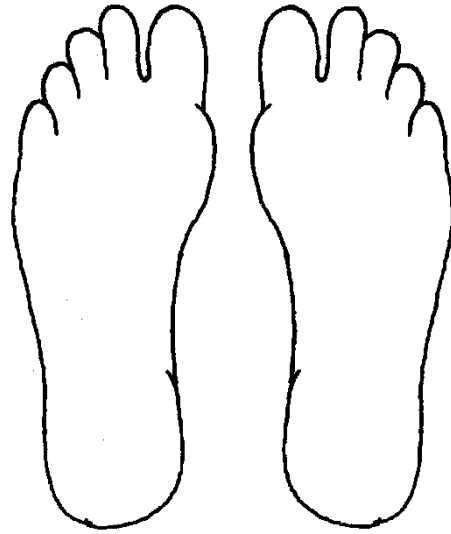
BODY MAP 4 – Feet

Name of pupil: _____

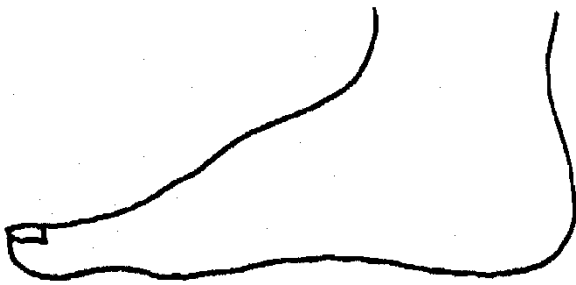
Date and time of observation: _____



R TOP L



R BOTTOM L



R

INNER



L



R

OUTER



L

Printed Name, Signature and Job title of staff: _____

Appendix 3 – QUICK LINKS

Blackburn with Darwen, Blackpool and Lancashire Children's Safeguarding Assurance Partnership (CSAP)
Procedures Manual 2024

<https://panlancashirescb.proceduresonline.com/chapters/contents.html>

Quick Links:

This contents list is sub divided into the following sections, each Section contains relevant Chapters/Procedures: (Click on the title to jump to the Section you require):

1. [Policy Framework](#)

The Blackburn with Darwen, Blackpool and Lancashire Children's Safeguarding Assurance Partnership (CSAP)

2. [Managing Individual Cases where there are Concerns about a Child's Safety and Welfare](#)

3. [Managing Individual Cases where there are Concerns about a Child's Safety and Welfare - Flowcharts](#)

4. [Children in Specific Circumstances](#)

5. [Safe Workforce](#)

6. [Individuals who Pose a Risk to Children](#)

7. [Professional Disagreements](#)

8. [Child Death](#)

9. [Child Safeguarding Practice Reviews](#)

10. [Regional Protocols](#)

11. [Local Protocols](#)

12. [Appendices](#)

<https://panlancashirescb.proceduresonline.com/chapters/contents.html>

Appendix 4 – Listening and Recording

This Listening and Recording table provides staff with guidance on how to respond and listen to a child who is worried, or who has something difficult to say.

Listening	Recording
<ol style="list-style-type: none"> 1. Do not make [false] promises to the child about confidentiality or keeping 'secrets' 2. You have no investigative role. Do not engage in 'interviewing' children or 'investigating' possible or suspected abuse. 3. Listen! Keep calm and don't interrupt. Remember to leave at least five seconds / space for children to think and respond 4. If you <i>have</i> to <i>clarify</i> information then ask only open questions wherever possible. This should be using the TED (Tell me, Explain, Describe) 5. Focus on, pick-out and record the facts i.e. who, what, when, where? Don't get embroiled in 'how' or 'why'? 6. Don't judge or react! Avoid displays of shock and keep opinions to yourself as these things may act as barriers to a child who has something sensitive to tell you. 7. 'When was the last time this happened' is an important thing to ascertain. 8. Reassure the child and make clear to them what you need to do now. 9. Reflect back – key points to enable the child to put right any misunderstandings 10. Ascertain the wishes and feelings of the child in any action to be taken 11. Name – the DSL/DDSL that you are going to report it to, it's important that the child knows who it is that you are passing the information on to 	<ol style="list-style-type: none"> 1. It is not advisable to try and complete a full record of the dialogue whilst trying to listen actively and attentively. However, it is a good idea to jot down any key phrases, dates, times etc. as soon as possible 2. Records that are handwritten should be succinct, legible, accurate, timed, signed and dated 3. Records should differentiate clearly between fact, opinion, interpretation etc. Ideally, stick to the facts as you understand them and leave it to the investigative agencies to test the hypotheses 4. If children or adults are being quoted then they must be quoted verbatim. In particular, avoid using other words or adult 'equivalents' for words that children use 5. It is important to record any questions or prompts asked i.e. to show that these were not 'leading' 6. The emotional context of the dialogue is important i.e. did the child become distressed at any point or, alternatively, did they speak matter-of-factly about quite distressing things 7. Any repetition is important to note i.e. things that the child repeats – these may be particularly significant. Similarly, gestures are important to describe accurately e.g. which hand / which cheek, open /closed

Appendix 5 – Definitions of abuse, neglect and exploitation

The definition of ‘abuse’ has been changed to clarify that harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects (KCSiE 2024).

<p>Sexual abuse involves:</p> <ul style="list-style-type: none"> 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: Physical contact including assault by penetration (for example, rape or oral sex); Non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing They may also include non-contact activities such as: Involving children in looking at, or in the production of sexual images; Watching sexual activities; Encouraging children to behave in sexually inappropriate ways; Grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate off line abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. 	<p>Emotional abuse is:</p> <p>The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. May involve:</p> <ul style="list-style-type: none"> conveying to a child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person; not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate; age or developmentally inappropriate expectations being imposed on children (These may include interactions that are beyond the child’s developmental capability, as well as over-protection and limitation of exploration and learning, or preventing the child participating in normal social interaction); seeing or hearing the ill-treatment of another; serious bullying (including cyber-bullying), Causing children frequently to feel frightened or in danger; The exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
<p>Physical abuse may involve:</p> <ul style="list-style-type: none"> 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. <p>Perplexing Presentations/Fabricated Illness</p> <ul style="list-style-type: none"> The carer does not physically harm the child but reports a clinical story, which is fabricated. This is frequently ‘supported’ by false specimens e.g. use of menstrual or animal blood; <p>Induced Illness</p> <ul style="list-style-type: none"> The carer inflicts harm on the child e.g. poisoning, suffocation, tearing etc. 	<p>Neglect is :</p> <p>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;</p> <ul style="list-style-type: none"> Neglect may occur during pregnancy as a result of maternal substance misuse; Once a child is born, neglect may involve a parent or carer failing to: Provide adequate food, clothing and shelter (including exclusion from home or abandonment); Protect a child from physical and emotional harm or danger; Ensure adequate supervision (including the use of inadequate care-givers); Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Appendix 6 – Indicators of Abuse, Neglect and Exploitation

Neglect	Emotional Abuse	Physical Abuse	Sexual Abuse
Tired/listless	Failure to thrive	Unexplained injuries	Age inappropriate sexual behaviour/knowledge/promiscuity
Unkempt	Attention seeking	Injuries on certain parts of the body	
Poor hygiene	Over ready to relate to others	Injuries in various stages of healing	Wary of adults/running away from home
Untreated medical conditions	Low self esteem	Injuries that reflect an article used	Eating disorders/depression/self-harm
Medical appointments missed	Apathy	Flinching when approached	Unexplained gifts/money
Constantly hungry or stealing food	Depression/self-harm Drink/drug/solvent abuse	Reluctant to change	Stomach pains when walking or sitting
Over eats when food is available	Persistently being over protective	Crying/ instability	
Poor growth	Constantly shouting at, threatening or demeaning a child	Afraid of home	Bedwetting
Poor/late attendance	Withholding love and affection	Behavioural extremes	Recurrent genital discharge / infections
Being regularly left alone or unsupervised	Regularly humiliating a child	Apathy/depression	Sexually transmitted diseases
Dressed inappropriately for the weather condition		Wanting arms and legs covered even in very hot weather	
Having few friends and/or being withdrawn			

