FHS
Francis Holland Schools

Safeguarding and Child Protection Policy

Table of Contents

Key Safeguarding Contacts 3
Introduction 5
1. Aims 5
2. Legislation and Statutory Guidance 5
3. Definitions 7
4. Equality statement 8
5. Roles and responsibilities 8
6. Confidentiality 14
7. Recognising Abuse and Taking Action 15
8. Online Safety and the Use of Mobile Technology 27
9. Notifying Parents or Carers 29
10. Pupils with Special Educational Needs, Disabilities or Health Issues 30
11. Pupils with Medical Conditions 30
12. Young Carers 30
13. Pupils with a Social Worker 30
14. Looked-after and Previously Looked-after Children 31
15. Pupils who are Lesbian, Gay, or Bisexual 31
16. Pupils who are questioning their Gender 31
17. Early Years Provision Safeguarding Arrangements 33
18. Complaints and Concerns about School Safeguarding Policies/Handling of Issues 34
19. Record-keeping 35
20. Training 36
21. Review 37
Appendix 1: Types of Abuse 38
Appendix 2: Allegations of Abuse Made against Staff (including low-level concerns) 40
Appendix 3: Specific Safeguarding Issues 46

Safeguarding and Child Protection Policy

This policy applies to:
Francis Holland Regents Park Francis Holland Sloane Square Francis Holland Prep
Where there are differences between the schools these have been clearly highlighted.

Key Safeguarding Contacts

	Sloane Square	**Regent's Park**	**FH Prep**
Designated Safeguarding Leads (DSLs)	Sarah Pittaway – Senior Deputy Head, and Trust Safeguarding Lead 020 7730 2971 ext: 2392 07712404123 Email: sarah.pittaway@fhs-sw1.org.uk Safeguarding team email: safeguarding@fhs-sw1.org.uk	Colette Mahieu – Deputy Head Pastoral 020 7723 0176 ext: 3216 Email: colette.mahieu@fhs-nw1.org.uk Safeguarding team email: dsl@fhs-nw1.org.uk	Elizabeth McLaughlin – Deputy Head (Pastoral) 020 7352 7077 Ext: 4210 Email: Elizabeth.McLaughlin@francishollandprep.org.uk Safeguarding team email: safeguarding@francishollandprep.org.uk
Deputy DSLs	Clare Stansfield – Senior Deputy Head (Teaching and Learning) Charlotte Hanrahan – Safeguarding Officer James Courtenay Clack - Head of Sixth Form Claire Wood – PA to the Senior Deputy Head	Nick Gridelli - Assistant Head/Head of Sixth Form Maria Merrigan – Head of Middle School and Head of PSHE Nesrine El Akel – Head of Lower School Steph Simoni, Safeguarding and Attendance Officer	Suzy Dixon – Head (until 31st December 2026); Flora Grossart – Head of Early Years (from 1st January 2027, will be DSL Early Years) Chrysa Rakitzi – Head of Inclusion Andrew Hart – Deputy Head Academic Melina Thompson – Head of Lower Key Stage 2
Designated Teacher for Looked After Children	This will be the Designated Safeguarding Lead (DSL) in each school (see contact details above)		
Local Authority Designated Officer (LADO)	Westminster & RBKC LADO 0207 641 7668 Email: LADO@westminster.gov.uk		
Multi-Agency Safeguarding Hub (MASH)	The Multi-Agency Safeguarding Hub (MASH) is the single point of entry for all children and young people who may need a service from Children's Social Care. Westminster: Access to Children's Services team 020 7641 4000 (9am to 5pm, Monday to Friday) or Emergency Duty Team 020 7641 2388 (outside of these times). To make a referral: Parents should call 020 7641 6000 9am to 5pm Mon to Fri, or Emergency number (above) at other times Schools should make referrals online via Westminster Multi-agency Referral Form Royal Borough of Kensington and Chelsea: Access to Children's Services team 020 7361 3013 (9am to 5pm, Monday to Friday) or Emergency Duty		

	Team 020 7373 2227 (outside of these times).
Chair of Governors	Mr Patrick Sherrington Contact via The Bursary 0207 730 8350 or Email: clerk@fhst.org.uk
Safeguarding Governor	Dr Frances Baawuah, MBChB, MRCP, MRCGP, DFSRH frances.baawuah@fhst.org.uk
Channel helpline	Parents should call 0800 011 3764 Schools should call 020 7340 7264
Support and Advice about Extremism	The Prevent Team can provide support and advice to schools as well as to a wide range of public sector bodies, health care professionals, community organisations and members of the public. Westminster Email: prevent@westminster.gov.uk or call 0781 705 4699 or 0779 098 0223 Hammersmith & Fulham and Kensington and Chelsea Telephone: 020 8753 5727 Shared inboxes: prevent@lbhf.gov.uk and prevent3@rbkc.gov.uk
Police Contact	If it is necessary to refer an incident to the police, this will be done through calling 101 / 999 or contacting our Designated Ward Officer at Charing Cross Police Station, Agar Street, London WC2N 4JP, or Kensington Police Station Central West BCU

NSPCC Whistleblowing Advice Line	Address: Weston House, 42 Curtain Road, London EC2A 3NH Tel: 0800 028 0285 (08.00 – 20.00 Mon to Fri) Email: help@nspcc.org.uk
NSPCC/Home Office Report Abuse in Schools Helpline	Tel: 0800 136 663 (08.00 – 22.00 Mon to Fri, 09.00 – 18.00 Sat & Sun) Email: help@nspcc.org.uk
NSPCC Child Protection Helpline	Tel: 0808 800 5000
Childline	Tel: 0800 1111 www.childline.org.uk
Disclosure and Barring Service	Address: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF Tel: 03000 200 190 Email: customerservices@dbs.gov.uk
Teaching Regulation Agency	Address: Cheylesmore House 5 Quinton Road Coventry CV1 2WT Tel: 0370 000 2288 Email: TRA.Casework@education.gov.uk
Ofsted Safeguarding Children	Tel: : 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: enquiries@ofsted.gov.uk
Forced Marriage Unit	Tel: 020 7008 0151 Email: fmu@fcdo.gov.uk
Reporting FGM	Police: 101
Independent Schools Inspectorate (ISI)	CAP House, Long Lane, London EC1A 9HA Tel: 020 7600 0100; Email: info@isi.net

Introduction

The Francis Holland Schools Trust (the 'Trust') fully recognises its responsibilities for safeguarding, child protection and protecting the welfare of all its pupils. Safeguarding refers to measures implemented to protect the health, wellbeing and human rights of children so that they may live free from harm, abuse, neglect and exploitation. The Policy applies to all pupils at Trust schools including those in the EYFS and all staff (whether employed full-time or part-time or contracted or volunteer) working in these schools and to the Members of the Council of Governors.

Related Policies

Anti-Bullying	Online Safety
Allergy and Anaphylaxis Prevention and Management	Personal, Social, Health and Economic Education (PSHE)
Artificial Intelligence	Pupil Digital Code of Conduct
Attendance	Pupil Mental Health and Wellbeing Guidance
Behaviour and Sanctions, incl Mobile Phone Use	Recruitment, Selection and Disclosure
Complaints from Parents of Pupils	Relationship and Sex Education (RSE)
Data Protection, and related Privacy Notices	Staff Code of Conduct
Equality, Diversity, Inclusion and Belonging	Staff Digital Technology Acceptable Use Agreement
First Aid and Accident Reporting	Staff Mental Health Champions Guidance
Health and Safety	The Use of Reasonable Force (and other Restrictive Interventions) Guidance
Low-level Safeguarding Concerns about Staff	Whistleblowing

1. Aims

The Trust aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding,
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working together to safeguard children 2026. We comply with this guidance and operate in accordance with the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

It also reflects the DfE's statutory guidance Working together to improve school attendance - GOV.UK which sets out how schools must work with local authority Children's Services, where a child's absence indicates a safeguarding concern.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014 .
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious

Crime Act 2015. which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- Statutory guidance on FGM. which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974. which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006. (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty. which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998. which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010. which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteachers should carefully consider how they are supporting their pupils with regard to these characteristics.
- The Public Sector Equality Duty (PSED). which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006. which set out who is disqualified from working with children
- Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk)
- The statutory framework for the Early Years Foundation Stage
- Children missing education: statutory guidance for local authorities and schools - GOV.UK
- Summary of responsibilities for children missing education
- Promoting children and young people's mental health and wellbeing
- United Kingdom Chief Medical Officers' commentary on 'Screen-based activities and children and young people's mental health and psychosocial wellbeing: a systematic map of reviews'
- The Information Commissioner's Office (ICO) guide to sharing information to safeguard children and young people in the education sector in the UK which is intended to help practitioners to feel confident to share personal information for safeguarding purposes.
- Use of reasonable force and other restrictive interventions guidance
- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people
- The Charity Commission guidance *Safeguarding and protecting people for charities and trustees* (June 2022)

For details regarding how each of these laws/guidance documents relates to safeguarding and to this Policy, please contact the Trust's Head of Compliance through the school office.

3. Definitions

Safeguarding and promoting the welfare of children means:

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

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

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

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

Exploitation involves being groomed, forced or coerced into doing something that you don't want to do for someone else's gain. It is a complex and hidden issue. Children who are being exploited can find themselves in situations where they experience abuse and violence, and may be forced to take part in criminal activities. It takes place in urban and rural areas and affects people of all ages, genders and ethnicities.

Making or sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, such as photographs videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

- For the purpose of this policy, the term 'making or sharing nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'. Rather than using this whole definition each time, we shall henceforth refer to these as 'nudes and semi-nudes'.

C**hildren** includes everyone under the age of 18. This policy is written in line with the guidance *Keeping Children Safe in Education* and therefore references children; but in our context, children/child/young person means any pupil of the school, including those who are 18 years or over.

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

- The local authority (LA): Hammersmith & Fulham Council, Kensington & Chelsea Council, Westminster Council
- The NHS North West London Integrated Care Board (previously known as clinical commissioning groups)

- The chief officer of police for a police area in the LA area: Central West Basic Command Unit

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

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

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Have a parent/carer who has expressed an intention to remove them from school to be home-educated.

Please see the Equality, Diversity, Inclusion and Belonging Policy for further information.

5. Roles and responsibilities

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

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our:

- Behaviour and Sanctions policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour or faith-based abuse and violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable.

5.1 All staff

All staff will:

- Read and understand at least Part 1 of the Department for Education's statutory safeguarding guidance, *Keeping Children Safe in Education (KCSIE)* in full, and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed this guidance.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are Lesbian, Gay, Bisexual or Gender Questioning to speak out and share their concerns.
- All staff have a duty to protect pupils from abuse and bullying and to promote their wellbeing. The safety and wellbeing of every pupil at a Francis Holland School is of paramount importance.
- Equally, all staff have the right to be treated with dignity and respect when in the workplace.
- All staff are required to read the Trust Staff Code of Conduct, and the Staff Digital Technology Acceptable Use Agreement, in conjunction with this Safeguarding and Child Protection Policy and other associated policies when they commence employment with the Trust. They are then required to review the Staff Code of Conduct, the Staff Digital Technology Acceptable Use Agreement and this Policy annually in September when they are updated. Staff are required to confirm that they have done so.
- The Staff Code of Conduct applies to all staff who work for The Francis Holland (Church of England) Schools Trust and aims to set and maintain standards of conduct that we expect all staff to follow. By creating this code of conduct, we aim to ensure our schools are an environment where everyone is safe, happy and treated with respect.
- The Staff Code of Conduct can be found on the individual school SharePoint areas, and on request from the People Team.
- All staff will be aware of:
    - Our systems that support safeguarding, including this Safeguarding and Child Protection Policy, the Staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, CPOMS, the Behaviour and Sanctions Policy, and the Online Safety Policy (which includes details of the Trust Mobile Phones Policy for all staff, pupils and parents), which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education/who are absent from education.
    - the school's unauthorised absence procedures and children missing education

procedures

- The Early Help, or the targeted early help level of community-based Family Help, assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
  - Drug taking and/or alcohol misuse
  - Unexplainable and/or persistent absences from education
  - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
- Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm, abuse or exploitation inside and outside their home, at school and online.
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- The fact that extra-familial harms take a variety of 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 - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be vulnerable to discriminatory bullying.
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 3 of this policy outlines in more detail how staff are supported to do this.

5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the Senior Leadership Team in each school.

The DSLs and Deputy DSLs are:

	Sloane Square	**Regent's Park**	**Prep**
Designated Safeguarding Lead (DSL)	Sarah Pittaway - Senior Deputy Head (Pastoral), and Trust Safeguarding Lead	Colette Mahieu - Deputy Head (Pastoral)	Elizabeth McLaughlin - Deputy Head (Pastoral)
Deputy DSLs	Clare Stansfield - Senior Deputy Head (Teaching and Learning) Charlotte Hanrahan - Safeguarding Officer James Courtenay Clack - Head of Sixth Form Claire Wood – PA to the Senior Deputy Head	Nick Gridelli - Assistant Head/Head of Sixth Form Maria Merrigan - Head of Middle School and Head of PSHE Nesrine El Akel - Head of Lower School Steph Simoni - Safeguarding and Attendance Officer	Suzy Dixon – Head (until 31st December 2026) Flora Grossart – Head of Early Years (from 1st January 2027, will be full DSL for EYFS) Andrew Hart- Deputy Head Academic Chrysa Rakitzi - Head of Inclusion Melina Thompson – Head of Lower Key Stage 2

The DSLs take lead responsibility for child protection and wider safeguarding in the Trust. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSLs will be available during school hours for staff to discuss any safeguarding concerns. Out of school hours, the DSLs can be contacted by email, which will be checked periodically.

To ensure continuity of safeguarding responsibilities, the school has robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances, ensuring that safeguarding concerns are received, monitored, and acted upon without delay. When the DSL is absent, the deputy DSLs will act as cover.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Operation Encompass, Disclosure and Barring Service (DBS), and/or

police), and support staff who make such referrals directly

- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our schools
- Make sure that staff have the appropriate Prevent training and induction

The DSL will also:

- Keep the headteachers informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school

The full responsibilities of the DSL and deputies are set out in their job description

5.3 The Governing Board

The governing board will:

- Facilitate a whole-Trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure that all staff read **at least part 1** of Keeping Safe in Education (KCSIE).
- Evaluate and approve this Safeguarding and Child Protection Policy at each review, ensuring it complies with the law, and hold the headteachers to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our schools' local multi-agency safeguarding arrangements
- The Public Sector Equality Duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them, such as sexual violence and sexual harassment, misogyny/misandry, racism and faith based prejudice. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSLs
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure the Trust has a policy in respect of the use of restrictive interventions, including the

use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils

- Ensure the schools have appropriate cyber security systems in place
- Ensure that the schools have appropriate filtering and monitoring systems in place, and regularly review their effectiveness (at least once every academic year). This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Ensuring that regular reviews are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept. See DfE's filtering and monitoring standards.
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
    - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors). Appendix 2 of this policy covers this procedure
    - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
    - Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteachers, where appropriate (see appendix 2).

All governors will read *Keeping Children Safe in Education* Part One and Part Two. Further sections of KCSIE will be read by governors depending on their role. All governors will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

Section 19.3 of this policy has information on how governors are supported to fulfil their role.

5.4 The Heads

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

- Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

- Communicating this policy to parents/carers when their child joins the school and via the schools' websites
- Ensuring that the DSLs have appropriate time, funding, training and resources, and that there is always adequate cover if the DSLs are absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 2)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and camera in the EYFS setting

5.5 Virtual school heads

- Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker, and those in kinship care (children who live with a relative or close family friend).
- They should also identify and engage with key professionals, e.g. DSLs, SENDCOs, social workers, mental health leads and others.

6. Confidentiality

Information sharing is vital in identifying and tackling all forms of abuse, neglect, and exploitation, and in promoting children's welfare, including in relation to their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.

When it comes to sharing information for safeguarding purposes within Francis Holland, with the three safeguarding partners and other agencies as required, the following should be noted:

- Timely information sharing is essential to effective safeguarding
- The Data Protection Act (DPA) 2018, and the UK GDPR 2021 and the Data (Use and Access) Act 2025 do not prevent, or limit, the sharing of information for the purposes of keeping children safe. They do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. For further information, see the Trust's Data Protection Policy and Privacy Notices.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
    - Rape, assault by penetration (rape or penetration with an object) and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 18, and allegations of abuse against staff in appendix 2

7. Recognising Abuse and Taking Action

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

- Has a disability 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 (EHC) plan)
- Has a mental health need
- Is a young carer
- Is pregnant and / or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit

- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalized into terrorism or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- 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 drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending

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

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

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

- Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**
- Tell the DSL (see section 5.2) as soon as possible if you make a referral directly. You need to contact the borough of residence of the child concerned. To check which council please use this link: Report child abuse to a local council - GOV.UK
    - Kensington & Chelsea 020 7361 3013 Kensington and Chelsea Social Services Line | Royal Borough of Kensington and Chelsea
    - Westminster 020 7641 4000 Children's social care | Westminster City Council
    - Hammersmith and Fulham 020 8753 6610
    - Camden 020 7974 3317
    - Alternatively, the police can be contacted on 101 or 999. https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to you

- If a child discloses a safeguarding issue to you, you should:
    - Listen to and believe them. Allow them time to talk freely and do not ask leading questions
    - Stay calm and do not show that you are shocked or upset
    - Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
    - Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
    - Write up your conversation as soon as possible in the child's own words by completing an incident log on CPOMS. Stick to the facts, and do not put your own judgement on it
    - Sign and date the write-up if handwritten and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police

directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

- Bear in mind that some children may:
    - Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
    - Not recognise their experiences as harmful
    - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

We will ensure that staff have sufficient understanding and use of English to ensure the well-being of children in their care. For example, to keep records in English, liaise with other agencies in English, be able to summon emergency help, and understand instructions, for example about the safety of medicines or food hygiene.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

- *Keeping Children Safe in Education* explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
- FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
- Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 3 of this policy.
- **Any teacher** who either:
    - Is informed by a girl under 18 that an act of FGM has been carried out on her; or
    - Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth
        - Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
        - Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.
- **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.
- The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.
- **Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil aged 18 or over appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures, completing an incident form on CPOMS.

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

- Figure 1 below, after section 7.7, which illustrates the procedure to follow if you have any concerns about a child's welfare.
- Where possible, speak to the DSL first to agree a course of action.
- Complete an incident log on CPOMS
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
- Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Community-based early help assessment

- If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need for Family Help can be found in Working Together to Safeguard Children.
- We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.
- The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.
    - To access early help for children in Westminster see here.
    - To access early help for children in Kensington and Chelsea see here.
    - To access early help for children in Hammersmith and Fulham see here.
    - To access early help for children in Camden see here.

Referral

- If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.
- If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.
- The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.
- To make a referral a MARF must be completed (available on the safeguarding section of each website of the relevant local authority) or an email sent. Concerns will be escalated where necessary by contacting the relevant manager within children's services.

7.5 If you have concerns about extremism

- If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.
- Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
- The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
- In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
    - Think someone is in immediate danger
    - Think someone may be planning to travel to join an extremist group
    - See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

- Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. This could include self-harm, suicidal ideation or risk of suicide. Mental health leads in the schools support the school to embed a whole school approach to mental health and wellbeing.
- Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
- If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.
- If you have a mental health concern that is not also a safeguarding concern, log the matter on CPOMS for review by a member of the Pastoral team.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- They can support the fulfilment of 4 key roles:
    - promoting good mental wellbeing and preventing the onset of mental illness
    - observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one
    - ensuring early targeted support is provided, and
    - liaison with/referral to specialist services where needed
- If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.
- These signs could include:
    - significant changes in behaviour

- ongoing difficulty sleeping
- withdrawing from social situations
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

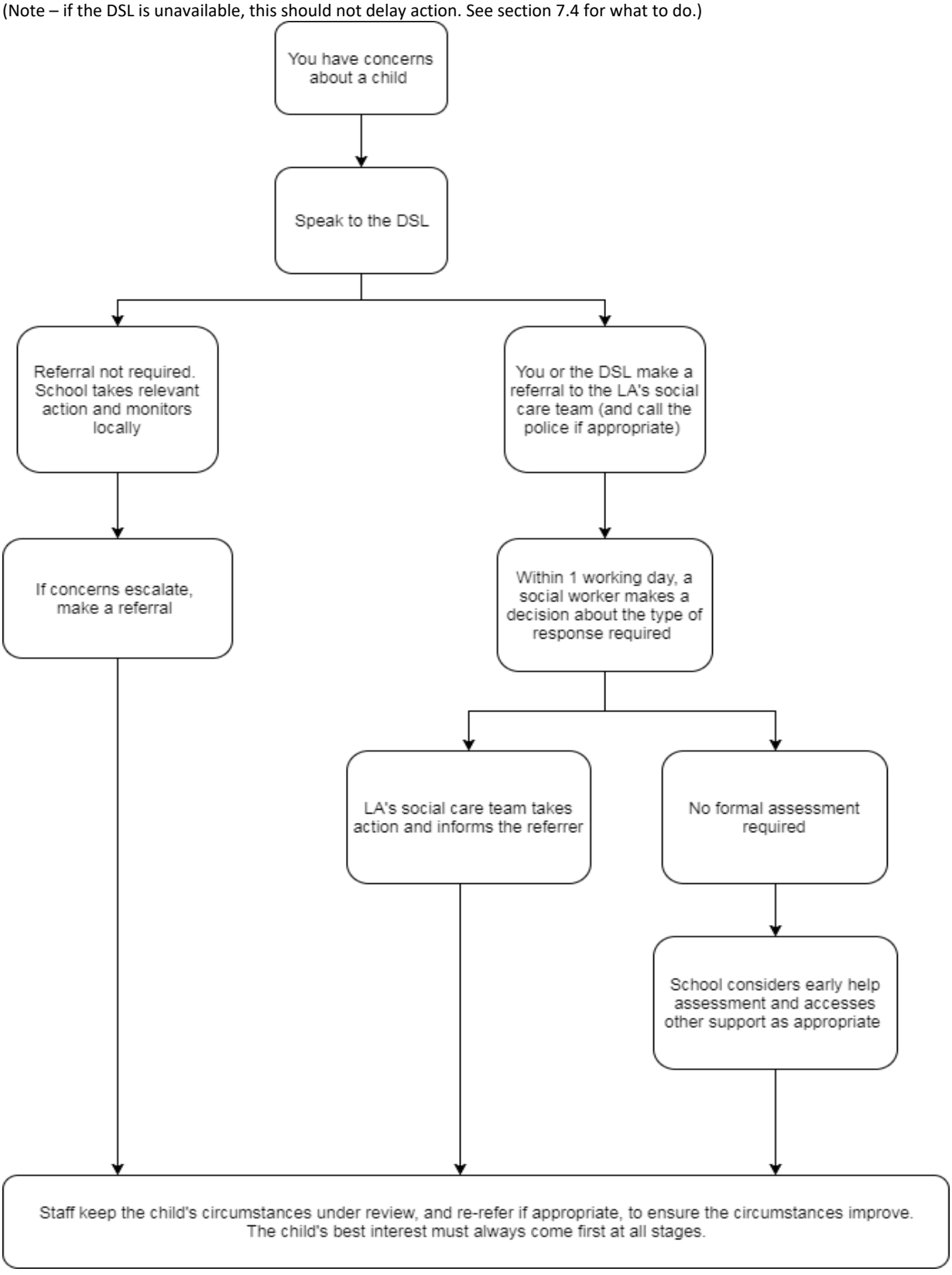
- If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.
- If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.
- Please read the Department for Education guidance Mental health and behaviour in schools for more information. Staff should liaise with Heads of Year and the DSLs who will consult with the school counselling team for advice and guidance.

7.7 Concerns about a staff member, supply teacher, trainee teacher, volunteer or contractor

- If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, communicate with the relevant headteacher as soon as possible. If the concerns/allegations are about the headteacher, communicate with the chair of governors.
- The headteacher/chair of governors will then follow the procedures set out in appendix 2, if appropriate.
- Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO). Details of the local LADO are on page 3 of this policy and can also be found on the local authority's website.
- If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.
- Where appropriate, the Trust will inform relevant agencies and regulators of the allegation and actions taken, within the necessary timescale (see appendix 2 for more detail).

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

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.8 Allegations of abuse (including harassment and violence) made against other pupils

- We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for pupils and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- **All** child-on-child abuse (including harassment and violence) is unacceptable and will be taken seriously.
- Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
    - Is serious, and potentially a criminal offence
    - Could put pupils at schools in the Trust at risk
    - Is violent
    - Involves pupils being forced to use drugs or alcohol
    - Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes (self-generated intimate images and/or videos including those generated using AI e.g. deepfakes)

See appendix 3 for more information about child-on-child abuse.

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

- If a pupil makes an allegation of abuse against another pupil:
    - You must record the allegation and tell the DSL, but do not investigate it
    - The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
    - The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
    - The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
    - If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.
    - Victims will be supported within the pastoral care structure, taking account of their views and feelings, and support may include counselling where appropriate. Staff should remember that in instances of child-on-child abuse perpetrators are often also victims.
- The DSL will advise as to appropriate next steps in light of the wider safeguarding context of the school. Important considerations will include:
    - The wishes of the victim in terms of how they want to proceed

- The nature of the alleged incident(s)
- The ages and developmental stages of the children involved
- Any power imbalance between the children
- Whether the alleged incident is a one-off or a sustained pattern of abuse
- Any ongoing risks to the victim or others

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

- We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.
- To achieve this, we will:
  - Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
  - Be vigilant to issues that particularly affect female pupils – for example, sexualised or aggressive touching or grabbing
  - Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
  - Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
  - Ensure staff reassure victims that they are being taken seriously
  - Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
  - Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
  - Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
  - Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
  - Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in the schools in the Trust, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
      - Children can show signs or act in ways they hope adults will notice and react to
      - A friend may make a report

        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to the DSL if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
    - That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
    - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
    - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Sharing of nudes and semi nudes (see definition in Section 3)

Your responsibilities when responding to an incident

- All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response.
- If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated (AI) images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.
- You must **not**:
    - View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
    - Delete the imagery or ask the pupil to delete it
    - Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
    - Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
    - Say or do anything to blame or shame any young people involved

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

Initial review meeting

- Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
  - Whether there is an immediate risk to pupil(s)
  - If a referral needs to be made to the police and/or children's social care
  - If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
  - What further information is required to decide on the best response
  - Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
  - Whether immediate action should be taken to delete or remove images or videos from devices or online services
  - Any relevant facts about the pupils involved which would influence risk assessment
  - If there is a need to contact another school, college, setting or individual
  - Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
  - The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 3 for more information on assessing adult-involved incidents
  - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
  - What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
  - The imagery involves sexual acts and any pupil in the images or videos is under 13
  - The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

- If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.
- They will hold interviews with the pupils involved (if appropriate).
- If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through calling 101.

Recording incidents

- All incidents of sharing of nudes and semi-nudes (self-generated intimate images and/or videos including those generated using AI e.g. deepfakes)self-, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

Curriculum coverage

- Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes (self-generated intimate images and/or videos including those generated using AI e.g. deepfakes)as part of our PSHE, RSE and computing programmes. Teaching covers the following in relation to the sharing nudes and semi-nudes (self-generated intimate images and/or videos including those generated using AI e.g. deepfakes)self-:
    - What it is
    - How it is most likely to be encountered
    - The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment. This also includes making such images, including where generated by AI.
    - Issues of legality
    - The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
    - Specific requests or pressure to provide (or forward) such images
    - The receipt of such images
- This policy on the sharing of nudes and semi-nudes (self-generated intimate images and/or videos including those generated using AI e.g. deepfakes)is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.
- Teaching follows best practice in delivering safe and effective education, including:
    - Putting safeguarding first
    - Approaching from the perspective of the child
    - Promoting dialogue and understanding
    - Empowering and enabling children and young people
    - Never frightening or scare-mongering
    - Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils

- Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
- We recognise the importance of ensuring pupils feel safe and comfortable to come forward

and report any concerns and/or allegations.

- To achieve this, we will:
    - Put systems in place for pupils to confidently report abuse
    - Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
    - Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
    - Pupils will be able to report their concerns by talking to any member of staff
    - Pupils will be made aware of reporting systems through discussion in our relationship/sex education curriculum, through form time and assemblies.
    - The safeguarding team will make pupils feel safe in submitting any concerns by ensuring pupils are reassured following disclosures.

8. Online Safety and the Use of Mobile Technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, our Trust aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors. This includes filtering and monitoring as part of AI usage.
- Protect and educate the whole school community in its safe and responsible use of technology devices, social networks and other online platforms including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of devices for the whole school community, including the expectation that our school is a mobile phone-free environment by default
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

- Our approach to online safety is based on addressing the following categories of risk:
    - **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
    - **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
    - **Conduct** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudess(elf-generated intimate images and/or videos including those generated using AI e.g. deepfakes) and/or pornography), sharing other explicit images and online bullying; and
    - **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If the school feels its pupils, or staff are at risk, they can report it to the Anti-Phishing Working Group (https://apwg.org/).

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

- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber- bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via communications sent directly to them and parenting talks. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Ensure that all schools are mobile phone-free environments by default; anything other than this should be by exception only. Mobile phones in schools - GOV.UK
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to the Trust's premises for their own use, but are to remain aware of appropriate use of technology in a school context
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet within the Trust, use of the Trust's ICT systems and use of their mobile and smart technology.
- At **Sloane Square** and **Regent's Park** Schools, all pupils in Years 7-11 will secure their mobile phones in *Yondr* pouches for safekeeping during the school day and have no access to them throughout the school day.
- Pupils at the **FH Prep** generally do not have mobile phones in school. Some Year 6 girls with specific permission are allowed to have them on their walk home in the Summer term. They will hand them in to Reception on arrival, until the school day ends.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the Trust's IT systems. The school regularly review their effectiveness at least once every academic year. Reviews include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our Trust's community
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

- This section summarises our approach to online safety and mobile phone use. For comprehensive details about our Trust's policy on online safety and the use of devices, please refer to our Online Safety Policy which can be found on our website.

Please refer to the Mobile Phone Policy.

8.1 Artificial intelligence (AI)

- Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as CoPilot, ChatGPT and Google Gemini.
- Francis Holland Schools Trust recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.
- Francis Holland Schools Trust will treat any use of AI to access harmful content or bully pupils in line with this policy and our Anti-Bullying / Behaviour and Sanctions / Artificial Intelligence policies.
- Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.
- Please see the Trust's Online Safety, and Artificial Intelligence (AI) policies for further information.
- Guidance to support schools and colleges to understand safety considerations and legal responsibilities if they choose to use Generative AI (either teacher-facing or pupil-facing) can be found at Generative artificial intelligence in education. See also AI Toolkit – Chiltern EdTech Hub

9. Notifying Parents or Carers

- Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.
- Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.
- If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
- In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.
- The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):
    - Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
    - Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with Special Educational Needs, Disabilities or Health Issues

- We recognise that pupils with special educational needs (SEND) and/or certain medical or physical health conditions can face additional safeguarding challenges both offline and online. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, neglect and exploitation in this group, including:
    - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
    - Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.
    - The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
    - Communication barriers and difficulties in managing or reporting these challenges can risk that they do not understand that what is happening to them is abuse.
    - Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or being unable to understand the consequences of doing so.
- We offer extra pastoral support for these pupils. This includes mentoring by our Learning Strategies Team (Sloane Square) or Learning Enhancement Department (Regent's Park) or Learning Enrichment Department (Francis Holland Prep) and additional training for all staff to raise awareness and understanding of the communication barriers pupils may face.
- Any abuse involving pupils with SEND will require close liaison with the DSL/DDSL and the SENDCO.

11. Pupils with Medical Conditions

- An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.
- A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.
- A child having a medical condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk. In the event of a clinical incident taking place in a school , the responsible healthcare professional, in conjunction with the DSL should consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident.

12. Young Carers

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

13. Pupils with a Social Worker

- Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's

experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

- The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:
    - Responding to unauthorised absence or missing education where there are known safeguarding risks
    - The provision of pastoral and/or academic support

14. Looked-after and Previously Looked-after Children

- We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
    - Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
    - The DSL has details of children's social workers and relevant virtual school heads
- We have appointed appropriately trained teachers to take the lead on promoting the educational achievement of looked-after and previously looked-after children. These are:
    - Sarah Pittaway, Senior Deputy Head Pastoral at **Sloane Square**;
    - Colette Mahieu, Deputy Head Pastoral and DSL at **Regent's Park**,
    - Elizabeth McLaughlin, Deputy Head Pastoral at **Francis Holland Prep**,
- As part of their role, they will:
    - Ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
    - Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

15. Pupils who are Lesbian, Gay, or Bisexual

The Trust recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our Behaviour and Sanctions Policy for more detail on how we prevent bullying based on sexuality.

- Any concerns should be reported to the DSL, our Diversity and Inclusion Leads, and counselling service.

16. Pupils who are questioning their Gender

16.1 Supporting pupils who are questioning their gender

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

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour and sanctions policy for more detail. The Trust will ensure that children and their families are

aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

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

The DSL will lead in these cases.

16.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

16.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE)).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition
- The school will ensure that the decision-making process is documented and records are kept.
- The circumstances or needs of a child may change over time, and the school may need to

review its original decision and will involve the DSL in doing so.

17. Early Years Provision Safeguarding Arrangements

The Prep School adheres to the requirements set out in the EYFS Statutory Framework including the requirements regarding safer sleeping arrangements, paediatric first aid training, safer eating and children's privacy in relation to toileting. The pupils are expected to be fully toilet-trained by the beginning of their Reception year. There is no requirement for staff to change nappies, but they will support pupils with personal care and toileting as needed during the school day. Should a pupil have a toileting accident during the school day, appropriately trained EYFS staff will support her in changing into clean clothing, ensuring that her dignity, privacy and welfare are safeguarded at all times.

17.1 Disqualification from working in childcare

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006.

These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Recruitment, Selection and Disclosure Policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified.

Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

17.2 Use of mobile phones and cameras

The School's policy on the use of mobile phones and cameras in the setting can be found in the Staff Code of Conduct, the Online Safety Policy and within the Digital Technology Acceptable Use Agreement. For example, 'Staff are not permitted to take photographs of pupils on personal devices or use mobile phones in EYFS areas', and 'Parents and visitors are not allowed to take photographs or recordings of pupils on personal devices when on site, on trips or at events. Reminders are given at the start of events and staff attending remain vigilant to the use of devices by parents and visitors to ensure adherence to this policy'. EYFS staff do not take mobile phones into the classrooms. They are permitted to use school iPad devices to take photographs of pupils and to maintain EYFS records.

17.3 Screen use

The School has regard to Government guidance on screen use for children in the early years, including the impact of screen time on children's health, development and wellbeing. The School's approach to screen use in the EYFS setting is age-appropriate and is set out in the Early Years Foundation Stage Policy. Staff in the EYFS setting are aware of the risks associated with excessive or inappropriate screen use for young children and take steps to manage and limit children's exposure to screens in line with the guidance.

17.4 Designated Safeguarding Lead for the EYFS

The Designated Safeguarding Lead who takes lead responsibility for safeguarding children in the early years settings is Elizabeth McLaughlin (until 31st December, thereafter Flora Grossart, Head of EYFS).

17.5 Duty to notify Ofsted

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegation of harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

17.6 Safeguarding training

The School ensures staff are trained in line with the criteria set out in Annex C of the EYFS Statutory Framework and are supported to implement the Policy on an ongoing basis.

The DSL provides support, advice and guidance to all staff on an ongoing basis, and on specific safeguarding issues that may arise. The DSL attends a training course, consistent with the criteria set out in Annex C of the EYFS Statutory Framework (July 2026).

The School's safeguarding training is renewed every two years and the School will consider whether staff need to undertake annual refresher training during any two-year period and to keep up to date with changes to safeguarding procedures or as a result of any safeguarding concerns that may occur at the school.

18. Complaints and Concerns about School Safeguarding Policies/Handling of Issues

17.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 2).

17.2 Other complaints

All other complaints raised will be handled in accordance with our policy Complaints from Parents of Current Pupils available on our website.

If a concern or complaint is raised by parents/carers regarding our EYFS provision, a record of the complaint and its outcome will be kept. Any complaint relating to our fulfilment of EYFS requirements will be investigated and the complainants notified of the outcome within 28 days of having received the complaint. This record of complaints will be made available to OFSTED on request.

17.3 Whistleblowing

If there are concerns regarding the way the Trust safeguards pupils, including poor or unsafe practice, these should be raised with the DSLs and headteachers in the first instance.

Concerns can also be raised with our Safeguarding Governor: Dr. Frances Baawuah frances.baawuah@fhst.org.uk.

All concerns will be thoroughly investigated. If there remains a concern that the issue has not been dealt with properly or a concern has not been acted upon the NSPCC can provide external support: call 0808 800 5000 or email help@nspcc.org.uk

Please see the separate Whistleblowing Policy in the Employment Manual and section 7.7 above regarding how to report concerns about a staff member, supply teacher, volunteer or contractor.
If there are concerns regarding our EYFS provision, parents should contact OFSTED by email enquiries@ofsted.gov.uk or call 0300 123 1231

19. Record-keeping

- We will hold records in line with our records retention schedule.
- All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.
- Records will include:
    - A clear and comprehensive summary of the concern
    - Dates and times
    - Details of how the concern was followed up and resolved
    - A note of any action taken, decisions reached and the outcome
    - Concerns and referrals will be kept in a separate child protection file for each child and should only be accessed by those who need to see it.
    - Safeguarding records relating to individual Prep school children will be passed on to their next school. Safeguarding records relating to individual Senior school children will be retained for a reasonable period of time after they have left the school.
    - If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.
    - To allow the new school/college to have support in place when the child arrives, this should be within:
        - **5 days** for an in-year transfer, or within
        - **The first 5 days** of the start of a new term
    - In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- All records are kept electronically on CPOMS
    - CPOMS is accessible via two step verification by the safeguarding and pastoral teams
    - Information is shared via egress, a secure email platform.
- In addition, our Recruitment, Selection and Disclosure policy sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 2 sets out our policy on record-keeping with respect to allegations of abuse made against staff

20. Training

20.1 All staff

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

This training will be regularly updated and will:

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

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

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).
Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

20.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

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

They will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

20.3 Governors

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

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

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

20.4 Recruitment – interview panels

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

Please see the Recruitment, Selection and Disclosure Policy for more information about our safer recruitment procedures.

20.5 Staff who have contact with pupils and families

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

21. Review

This policy will be reviewed at least **annually** in line with any legislative changes or in response to serious incidents by the Designated Safeguarding Leads. At every review, it will be approved by the full governing board.

Policy author/s	RP: Deputy Head Pastoral SSq: Senior Deputy Head Pastoral Prep: Deputy Head Pastoral
This review	Summer 2026
Approved by	Safeguarding Committee of the Governing Council, September 2026 Ratified by full Governing Council, September 2026
This policy published	September 2026
Next review	Summer 2027

The Francis Holland Schools Trust is an educational charity which manages three leading independent girls' schools in central London, across three sites.
Registered charity number: 312745
Registered office: Francis Holland Schools Trust, 35 Bourne Street, London SW1W 8JA

The following appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: Types of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse Sexual abuse can take place online, and technology can be used to facilitate offline abuse.
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

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

- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate 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 2: Allegations of Abuse Made against Staff (including low-level concerns)

Section 1: Allegations that May Meet the 'Harms Threshold'

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

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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO). We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the Chair of Governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

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

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

- Redeployment within the Trust so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the Trust so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school in the trust
- If in doubt, the case manager will seek views from the Trust's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the Trust is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the Trust and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action within the Trust and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate, such as counselling or from trade union representatives. Staff can seek support from HR and from the school's Employee Assistance Programme helpline 0330 058 4885.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed

in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
- If the Trust is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the Trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the Trust's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers, trainee teachers, and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the Trust, such as a supply teacher , trainee teacher, or contracted staff member provided by an agency, the school shares safeguarding responsibilities with the employment agency or business. We will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Trust will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the Trust, while the Trust carries out the investigation
- We will involve the agency fully, but the Trust will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as supply agencies.

Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days
- However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

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

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

How to manage press interest if, and when, it arises.

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold ('low-level concerns')

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the Trust
- Pre-employment vetting checks

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

Definition of low-level concerns

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

For full details about low-level concerns and how these are dealt with by the Schools, please see the separate Low-level Concerns about Staff Policy.

Appendix 3: Specific Safeguarding Issues

Assessing adult-involved nude and semi-nude sharing incidents

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

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

Sexually motivated incidents

In this type of incident, an adult offender obtains such images (above) directly from a child or young person using online platforms.

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

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

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

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

Financially motivated incidents

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

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

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

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

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

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

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

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe.

Children who are absent from education

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

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

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority

if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

In the EYFS if a pupil is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

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

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

Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

This can be committed or facilitated by an organised network or gang, and victims may identify as part of this group, and it may constitute modern slavery. Further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

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

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding

procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

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

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

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

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

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

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections, displaying sexual behaviours beyond expected sexual development or becoming pregnant

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

Child-on-child abuse (including harassment and violence)

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

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

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes (also known as nudes/semi-nudes, sexting or youth produced sexual imagery)

- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

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

Cybercrime

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

Cyber-dependent crime continues to represent one of the most significant and rapidly evolving threats within the United Kingdom's (UK) crime landscape. Offences under the Computer Misuse Act 1990 (CMA) have risen substantially.

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 interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSLs or DDSLs will consider referring the pupil concerned into the Cyber Choices programme (a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing which 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.)

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK.

Domestic abuse

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

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

This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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

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

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

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

Operation Encompass –

Operation Encompass is the statutory duty for police to notify a child's school (the day after an incident takes place) if they believe a child may be a victim of domestic abuse across England and Wales. This includes:

- all children connected to a household where they have attended a domestic abuse incident;
- children who are physically present at the incident,
- children not physically present during the incident, and
- situations where a child might reside in another household temporarily or permanently.

Police should share the child's name and details, their relationship to the victim or perpetrator, a police reference number, details of the incident and the voice of the child, such as what they are saying and how they are behaving.

The DSLs have all been trained in Operation Encompass and are the Key Adults for Operation Encompass notifications.Schools must comply with data protection laws during the Operation Encompass process, which involves sensitive information.

Homelessness

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

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

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

Honour or faith-based abuse (including female genital mutilation and forced marriage)

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

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

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

Female Genital Mutilation (FGM)

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected

by FGM or at risk of FGM.

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

Indicators that FGM has already occurred include:

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

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

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

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

Forced marriage

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

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or Email: fmu@fcdo.gov.uk

  Arrange ongoing support for the pupil, which may include counselling.

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

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

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

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.

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

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

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

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

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

Further information on the Trust's measures to prevent radicalisation are set out in other Trust policies and procedures, including the Online Safety policy and PSHE and RSE policy.

Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- 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. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- 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)

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 another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

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

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

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

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

When supporting victims, staff will:

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

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

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

Serious violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy), who will assess the risk and take appropriate action. Where relevant,this will include any action needed to de-escalate peer conflict.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in violence (who may also be victims themselves). Early, evidence-based support for those considered at risk, as well as in 'teachable moments' when issues emerge is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support.

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

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

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

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.
The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing

them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in on *Inventry* and wear a visitor's badge.

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

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

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

For further details, please see the Trust's Visiting Speakers Policy.

Non-collection of children

If a child is not collected at the end of the session/day, we will contact the parents using all numbers stored on iSAMs. The child will be looked after by staff in the school office until they are safely collected, and the incident will be logged. We will report the incident to children's services if required.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. Pupils are registered at the start of the school day and any absences are followed up as soon as possible and before first break. We are particularly conscious of pupils who may be vulnerable due to reasons such as past concerns, mental health needs, being on a child in need or child protection plan and those with special educational needs or disabilities. Pupils are also registered in their lessons by their teachers and in afternoon registration. If a child is absent from school without notification of absence having been received, we will contact the parents and if the whereabouts of the child is still unknown, the DSLs will be informed, and we will contact the police on 101. We will log the incident on CPOMS.

The information required by the Police to assist in locating and returning the pupil to a safe environment is as follows:

- The pupil's name/s; date of birth; status (for example looked after child); responsible authority;
- Where and when they went missing;
- Previous missing episodes and where they went;
- Who, if anyone, they went missing with;
- What the child was wearing plus any belongings they had with them such as bags, phone etc.;
- Description and recent photo;
- Medical history, if relevant;
- Time and location last seen;
- Circumstances or events around going missing with relevant safeguarding information;
- Details of family, friends and associates.

Whilst the search is ongoing, the school will continue to liaise with the police and act in accordance with police instructions.

1. If the child returns before the Police have arrived, then the Police must be informed, and own school procedures need to be followed.
2. If the child returns to school of their own volition, then the Police must be informed and own school procedures need to be followed.
3. If the police locate the child and bring them back to the school the Police will conduct the safe and

wellbeing interview and the school will follow School procedure.

4. Where a pupil has a known risk of being missing, a risk assessment for the pupil will be written and put in to place.

Any child who is absent from school without explanation will be reported to Children's Services as 'missing in education'. We will be particularly vigilant regarding children not returning to school in September from the summer holidays and ensure all staff are made aware of the issues of forced marriage, female genital mutilation (FGM) and risk of radicalisation.