Atomix Educational Trust

Child protection and safeguarding policy

2026-27

Document control

Policy owner	Trust designated safeguarding lead
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Changes in this version

This version reflects Keeping Children Safe in Education 2026. Four new sections have been added (11, 12, 15 and 16), so sections from 11 onwards have been renumbered. The changes include:

- removal of the condensed 'Annex B', so all staff are now required to read at least part 1 of KCSIE in full
- a new requirement for schools to be mobile phone-free by default, and updated categories of online risk
- a new dedicated section on the use of artificial intelligence (AI), including AI-generated ('deepfake') imagery
- new sections on pupils with medical conditions and young carers
- expanded provisions on pupils questioning their gender, including social transition and single-sex spaces and sports
- expanded provisions on misogyny/misandry and its intersection with harmful sexual behaviour
- references to the Crime and Policing Act 2026 and to Operation Encompass, which is now statutory for all police forces

This policy must be read alongside the July 2026 Keeping Children Safe in Education full document.

Important contacts

Role or organisation	Name	Contact details
Trust designated safeguarding lead (DSL)	Michael Mackin	Michael.Mackin@atomix.ac.uk
Centre DSL or deputy DSL, Bishopton	Kate Dack	Kate.dack@atomix.ac.uk
Centre DSL or deputy DSL, Errington	Allan Fishpool	Allan.fishpool@atomix.ac.uk
Centre DSL or deputy DSL, Stockton Sixth Form	Michelle Sugden	Michelle.sugden@atomix.ac.uk
Centre DSL or deputy DSL, Prior Pursglove	Angela Stevenson	Angela.stevenson@atomix.ac.uk
Local authority designated officer (LADO)	As per centre local authorities identified in local policies	Local authorities
Chair of trust board	Tim Blades	timothy.blades@atomix.ac.uk
Channel helpline		020 7340 7264

1. Aims

The Trust's schools aim 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 statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Academy trust governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.

- 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 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.
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation.
- Operation Encompass statutory guidance, which explains that the police must notify any relevant education establishment of any incidents involving domestic abuse.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and Childcare Act 2006, which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

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

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children's mental and physical health or development.

- Making sure 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 protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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.

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, 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 making or sharing of nude or semi-nude images requires a safeguarding response whether it is consensual or non-consensual.

Children includes everyone under the age of 18.

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

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

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, 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 (see section 12).
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- 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 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 from education.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors and trustees across our 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, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our:

- Behaviour 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/equality, body confidence and self-esteem, recognising an abusive relationship, and the concepts of and laws relating to sexual consent, exploitation, grooming, coercion, harassment, rape, domestic abuse, honour-based violence and FGM.

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 2026, in full and review this guidance at least annually.

- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents.
- Understand the expectations, roles and responsibilities around filtering and monitoring systems to promote online safety.
- Provide a safe space for pupils who are LGBTQI+ to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including this policy, the staff code of conduct, the role and identity of the DSL and deputies, the behaviour policy, the online safety policy and the response to children who go missing from education.
- The trust's unauthorised-absence procedures and children-missing-education procedures.
- The early help assessment process (sometimes known as the common assessment framework) 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 community-based Family Help assessments.
- The process for making referrals to local authority children's social care and for statutory assessments.
- What to do if they identify a safeguarding issue or a child discloses abuse or neglect, including FGM. The signs of different types of abuse and neglect, and specific issues such as child-on-child abuse, CSE, CCE, serious violent crime, FGM, radicalisation and 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) and radicalisation; consensual and non-consensual making or sharing of nudes or semi-nudes; and new and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation and radicalisation, and the role of technology and social media in presenting harm.
- The importance of reassuring victims that they are being taken seriously.
- That children can be at risk of harm inside and outside home, at school and online.
- That mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide, and could also indicate that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- That children who are (or perceived to be) LGBT can be targeted by other children.
- That some children are at greater risk of harm than others – **online and offline** – including children who need a social worker, children absent from education, EHE, children requiring mental health support, and looked-after children/care leavers.
- What to look for to identify children who need help or protection.

5.2 The designated safeguarding lead (DSL)

Our DSL is Michael Mackin. The DSL takes lead responsibility for child protection and wider safeguarding in the trust. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Michael Mackin will assume overall responsibility; Heads of Centres (or DSL nominees) assume responsibility for their centres:

- **Kate Dack (Bishopton),**
- **Allan Fishburn (Errington),**
- **Michelle Sugden (Stockton Sixth Form),**
- **Angela Stevenson (Prior Pursglove). In their absence, their deputy DSLs will assume responsibility, as published in the local safeguarding policy on centre websites.**

If the DSL and deputy DSLs are not available or absent, their Deputy DSL's will assume responsibility, as published on the local safeguarding policy located on the centre websites This includes a named on-call contact for each centre and a shared safeguarding mailbox, so that other members of staff are always able to act on a safeguarding concern.

The DSL 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, and support staff who make referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Take responsibility for understanding the filtering and monitoring systems and processes in place in school.

The DSL will also:

- Keep the Head of Centre 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 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 in sexual violence and sexual harassment, and how to access it.
- 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 schools or colleges, ensure their child protection file is transferred to the new establishment.

5.3 The trust board and governing body

The trust board and governing body will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher 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 school's local multi-agency safeguarding arrangements.
- Appoint a senior board level lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- Ensure that each school/college 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 trust/schools/colleges has appropriate cyber security systems in place.
- Make sure the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
- Make sure online safety is a running and interrelated theme within a whole-school approach to safeguarding and related policies.
- Ensure that the trust/schools/colleges has appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes making sure the leadership team and staff are aware of the provisions in place and understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training; and ensuring that reviews are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team, with a record of these checks kept.
- Ensure 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. Appendix 3 of this policy covers this procedure.
- Ensure 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 on the premises: seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed; ensure arrangements exist for the body to liaise with the school about safeguarding; and make safeguarding requirements a condition of using the premises.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher/head of centre, where appropriate (see Appendix 3).

All governors will read Keeping Children Safe in Education 2026 in its entirety. Section 19 of this policy has information on how governors are supported to fulfil their role.

5.4 The Head of Centre

The Head Teacher/Head of Centre is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy, as part of their induction, and 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 school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly.
- 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 3).
- 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.

Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker. They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

6. Confidentiality

The Trust's approach to confidentiality and data protection with respect to safeguarding is explained in our Students' Privacy Statement.

You should note that:

- Timely information-sharing is essential to effective safeguarding.
- Arrangements are in place setting out the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies and practitioners as required.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018, the Data (Use and Access) Act 2025, and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment, the DSL will have to balance the victim's wishes against their duty to protect the victim and other children, informed by the government's information sharing advice for safeguarding practitioners and its 7 'golden rules' for sharing information.
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).
- Where a child leaves the school/college, the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving.

Confidentiality is also addressed in this policy with respect to record-keeping in section 18, and allegations of abuse against staff in Appendix 3.

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 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 gang involvement and association with organised crime groups or county lines.
- 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 radicalised into terrorism.
- Has a parent or carer in custody, or is affected by parental offending.
- Is viewing problematic and/or inappropriate online content, 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 FGM or forced marriage.
- Is a privately fostered child.

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, references to the DSL 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.

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, allowing them time to talk freely without leading questions; stay calm and not show that you are shocked or upset; tell the child they have done the right thing in telling you; explain what will happen next and that you will have to pass this information on, without promising to keep it a secret; write up your conversation as soon as possible in the child's own words, sticking to the facts; and sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), telling 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; may not recognise their experiences as harmful; or may feel embarrassed, humiliated or threatened 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.

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'.

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 has no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures. The duty for teachers mentioned above does not apply where a pupil is at risk of FGM or FGM is suspected but not known to have been carried out, staff should not examine pupils. Any member of staff who suspects a pupil is at risk of FGM, suspects FGM has been carried out, or discovers that a pupil aged 18 or over appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

7.4 If you have concerns about a child

Figure 1 (referenced later in this section) illustrates the procedure to follow if you have any concerns about a child's welfare, as opposed to believing a child is suffering or likely to suffer harm, or is 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 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, sharing any action taken with the DSL as soon as possible.

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, keeping the case under constant review and considering a referral to children's social care if the situation does not seem to be improving.

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, you must tell the DSL as soon as possible. The local authority should make a decision within 1 working day of a referral about what course of action to take. 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.

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

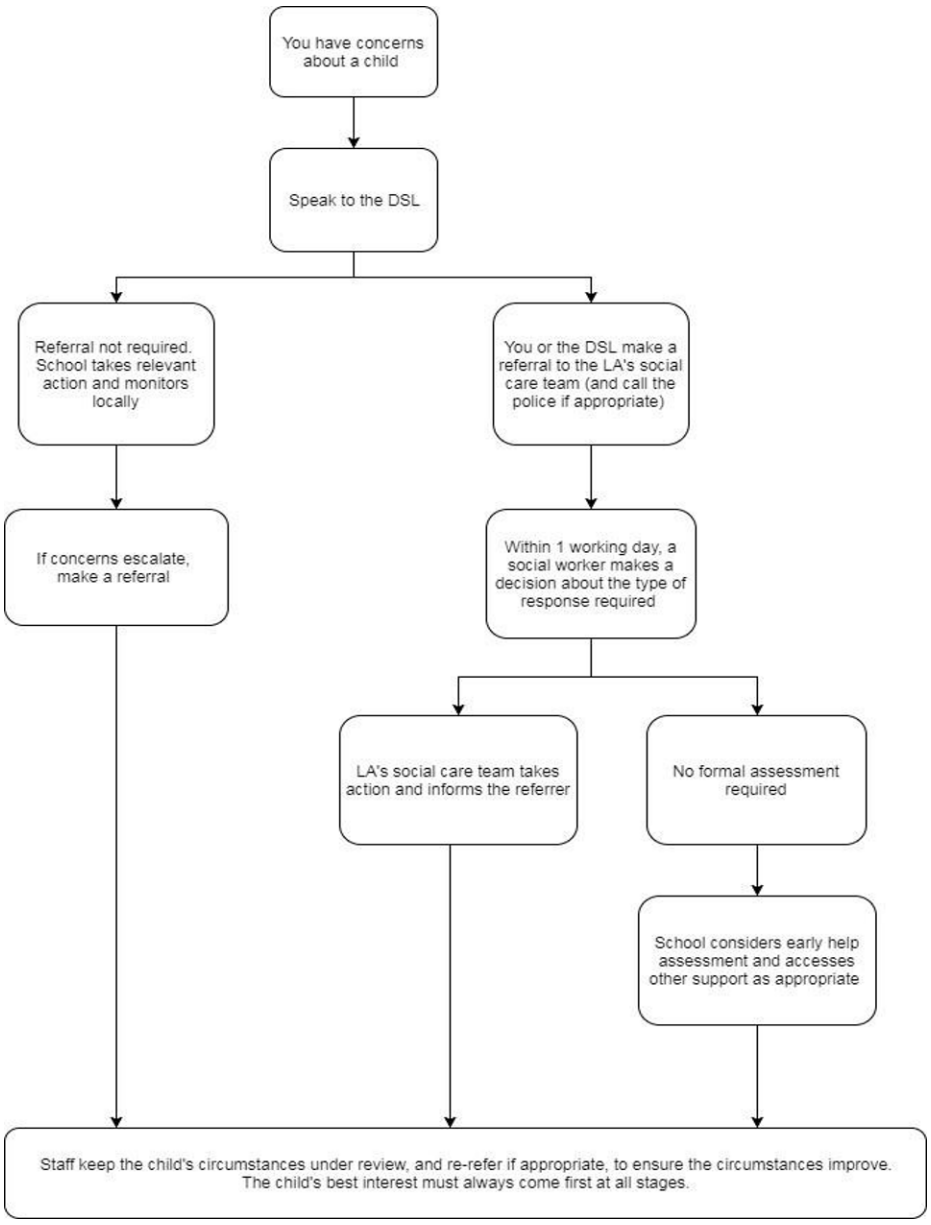


Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

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 the DSL is not available in exceptional circumstances, this should not delay appropriate action. Speak to a member of the SLT and/or seek advice from children's social care, making a referral directly if appropriate and informing the DSL as soon as practically possible afterwards.

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 the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE 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 (not for emergency use). You can also email counter.extremism@education.gov.uk. 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, or 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. Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, 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 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, including:

- Significant changes in behaviour.
- Ongoing difficulty sleeping.
- Withdrawing from social situations.
- Not wanting to do things they usually like.
- 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 by calling 111 and selecting the mental health option.

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

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, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors by emailing Janette Ferreira, Governance Professional, at Janette.Ferreira@stockton.gov.uk.

The headteacher/chair of governors will then follow the procedures set out in Appendix 3, 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). Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Appendix 3 for more detail).

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up', as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour is serious and potentially a criminal offence; could put pupils in the school at risk; is violent; involves pupils being forced to use drugs or alcohol; or involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, including where generated by AI).

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

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

If a pupil makes an allegation of abuse against another pupil: you must record the allegation and tell the DSL, but do not investigate it. The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence. The DSL will put a risk assessment and support plan into place for all children involved, with a named person they can talk to if needed, and will contact 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. Disciplinary action can be taken while other investigations are ongoing, considered case-by-case, taking into account whether taking action would prejudice an investigation and/or subsequent prosecution.

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

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

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (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.
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increase the risk of child-on-child abuse, including sexual harassment and sexual violence, within our school environment.
- 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, making 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; that even where there are no reports it does not mean it is not happening; that they should act on concerns immediately rather than wait to be told; that certain children may face additional barriers to telling someone; that a pupil harming a peer could be a sign that the child is being abused themselves; the important role they have to play in preventing and responding to child-on-child abuse; 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; and that they should discuss with the DSL any concern about a pupil's exposure to misogynistic or misandrist content.

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.

7.9 Making or sharing of nudes and semi-nudes

All incidents involving the making or sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, and including where generated by AI, require a safeguarding response.

Your responsibilities when responding to an incident: if you are made aware of an incident involving the making or sharing of nude or semi-nude images, videos or live streams (including where generated by AI), 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) involved 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/carers; or 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, the DSL will hold an initial review meeting with appropriate school staff to consider the initial evidence and determine matters such as whether there is an immediate risk to pupil(s); whether a referral needs to be made to the police and/or children's social

care; whether it is necessary to view the image(s) (in most cases they should not be viewed); what further information is required; whether the image(s) have been shared widely; whether immediate action should be taken to delete or remove images from devices or online services; and whether to contact parents or carers (in most cases they should be involved).

The DSL will make an immediate referral to police and/or children's social care if: the incident involves an adult (including where an adult poses as a child to groom or exploit a child or young person, which may first present as a child-on-child incident); there is reason to believe a young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent; 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; or the DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes.

If none of the above apply, the DSL, in consultation with the headteacher and other staff as appropriate, may decide to respond to the incident without involving the police or children's social care, with the decision 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/children's social care, the DSL will conduct a further review to establish the facts and assess the risks, including interviews with the pupils involved where appropriate. If at any point there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made 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 the local neighbourhood police by dialling 101.

Recording incidents: all incidents of making or sharing of nudes and semi-nudes, including where generated by AI, 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 making or sharing of nudes and semi-nudes, including where generated by AI, as part of our relationships and sex education and tutorial programmes. Teaching covers what it is; how it is most likely to be encountered; the consequences of requesting, forwarding, providing or making such images, including when it is and is not abusive and when it may be deemed online sexual harassment; issues of legality; and 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 make, provide or forward such images, and the receipt of such images.

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; and make it clear

to pupils that their concerns will be taken seriously and that they can safely express their views and give feedback.

Through our PSHE curriculum, children are taught to share and talk about any worries or concerns that they have. We have a comprehensive relationships curriculum where children are taught about healthy relationships. We also have a worry box in class where issues can be placed in a more confidential manner.

When a child shares their concerns, we listen without asking leading questions and then record the incident as soon as is possible on CPOMS. We form positive trusting relationships with our children and will always support and guide our pupils when a disclosure happens, reminding them that we can't keep secrets if they are shared, but we will get the appropriate help to support our pupils.

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 schools aim to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Ensure our 'schools' are a mobile phone-free environment by default: mobiles are not permitted by pupils, and pupils are not permitted to have their mobile device on them during the school day. Note this does not refer to post 16 settings.
- 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 peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI, and online bullying.
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

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

- Educate pupils about online safety as part of our curriculum, including the safe use of social media, keeping personal information private, recognising unacceptable behaviour online, and reporting cyber-bullying.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our website, direct communications and parents' evenings, sharing clear procedures for raising concerns.
- Make sure staff are aware of restrictions on personal phone/camera use, including that personal phone use is limited to non-contact time and staff will not take pictures or recordings of pupils on personal devices.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding acceptable use of the internet, the school's ICT systems and mobile/smart technology, and explain the sanctions for breaches.
- 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, noting that filtering and monitoring requirements also apply to the use of generative AI (see section 8.1 below).

- Carry out an annual review of our filtering and monitoring effectiveness, conducted by the SLT member responsible for filtering and monitoring with the support of our DSL and IT support, keeping a record of the checks carried out.

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

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 ChatGPT and Google Gemini.

Atomix Educational 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.

Atomix Educational Trust will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying/behaviour/AI policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the trust/schools and colleges. Our trust/schools/colleges requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education 2026 .

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 (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; and 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 (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.

Communication barriers and difficulties in managing or reporting these challenges, which risk them not understanding that what is happening to them is abuse.

- The need for intimate care, or that these children are isolated from others.
- That these children are more likely to be dependent on adults for care.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school, or being unable to understand the consequences of doing so.

We offer extra pastoral support for these pupils. This includes drop-in therapeutic support and weekly 1:1 sessions with our Mental Health lead, specific team meetings where teachers and professionals meet to talk about the needs of pupils, and a robust pastoral team on hand all day to support with any needs.

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

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.

12. Young carers

The trust 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 services.

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, and 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, and that the DSL has details of children's social workers and relevant virtual school heads.

We have appointed a designated teacher and a central student services team (college) who are responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. All are appropriately trained and have the relevant qualifications and experience to perform the role.

As part of their role, they will work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to,

and work with virtual school heads to promote the educational achievement of these children, including discussing how pupil premium plus funding can be best used to support them and meet the needs identified in their personal education plans.

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 policy for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL.

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 policy for more detail. The trust will ensure that children and their families are aware that, while the trust 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/college, 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 trust/schools/colleges 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 trust/school/college and a child’s parents/carers have been involved (as set out in Keeping Children Safe in Education).

In making decisions about supporting social transition, the trust/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 trust/school will make decisions in line with the following principles:

- The trust 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 them would constitute a greater risk to the child than not involving them).
- Accommodating social transition is an active intervention, so the school will take a very careful approach, given the potentially significant effects on the child's 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 trust/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 trust/school may need to review its original decision, involving the DSL in doing so.

16.4 Rules on single-sex spaces

Pupils/students are not allowed into toilets, changing rooms or showers designated for the opposite biological sex, with no exceptions.

16.5 Rules on single-sex sports

The trust/school/college may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The trust/school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

17. Complaints and concerns about school safeguarding policies

Complaints against staff

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

Other complaints

Safeguarding-related complaints of other types (for example, those related to pupils or premises) are addressed through the Trust Complaints Policy.

Whistle-blowing

It may be appropriate to refer to the Trust whistleblowing policy.

18. Record-keeping

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded in writing. 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, details of how the concern was followed up and resolved, and a note of any action taken, decisions reached and the outcome.

Concerns and referrals will be kept in a separate child protection file for each child. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school. Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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.

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

19. Training

All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse 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; and have regard to the Teachers' Standards to support the expectation that all teachers manage behaviour effectively to ensure a good and safe environment and 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 being drawn into terrorism and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually. Contractors provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training. Volunteers will receive appropriate training, if applicable.

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. They will also undertake Prevent awareness training.

Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated, so that they have the knowledge and information needed to perform their functions and can be assured that safeguarding policies and procedures are effective.

As the chair of trust board/governing body 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.

Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. See Appendix 2 of this policy for more information about our safer recruitment procedures.

20. Monitoring arrangements

This policy will be reviewed annually by Nichole Munroe, Chief Executive Officer and Trust DSL. At every review, it will be approved by the trust board and noted and adopted by local governing bodies.

21. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff behaviour or code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Artificial intelligence (AI)
- Mobile phone use
- Equality

- Relationships and sex education
- First aid
- Curriculum
- Privacy notices
- Whistleblowing
- Anti-bullying

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap. 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.
- 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, including interactions beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning.
- 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.
- Verbal abuse such as criticism, belittling, or name-calling.

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, oral sex, or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing; or non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: safer recruitment and DBS checks

See the Trust recruitment and selection policy.

Appendix 3: allegations of abuse made against staff

See the Trust allegations against staff policy.

Appendix 4: specific safeguarding issues

Children missing from education

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

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who are at risk of harm or neglect; are at risk of forced marriage or FGM; come from Gypsy, Roma, or Traveller families; come from the families of service personnel; go missing or run away from home or care; are supervised by the youth justice system; cease to attend a school; or come from new migrant families.

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

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage. If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries, and 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. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse, including that perpetrated by organised networks or gangs. 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. This can include children who have been moved for the purpose of exploitation, which 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; and regularly missing school or 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, in 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. Most sexual abuse is committed by individuals known to the victim. 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, and often trust their abuser. CSE can include both physical contact and non-contact sexual activity, and can also happen online, for example, young people may be persuaded or forced to share sexually explicit images, have sexual conversations by text, or take part in sexual activities using a webcam. This can include children who have been moved for the purpose of exploitation, which may constitute modern slavery.

In addition to the CCE indicators above, indicators of CSE can include a child having an older boyfriend or girlfriend, or suffering from sexually transmitted infections or becoming pregnant.

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

Child-on-child abuse

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

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening. Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children ('teenage relationship abuse').
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (which may include an online element).
- Sexual violence, such as rape, assault by penetration and sexual assault (which may include an online element).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery), including those generated using AI.
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (which 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 nude or semi-nude 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, sections 7.8 and 7.9 set out more detail about our school's approach to this type of abuse. When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic abuse

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

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

Police must notify a school/education setting of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the DSL) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child'. This is the procedure set out in the statutory Operation Encompass guidance for information sharing, which is now in place across all police forces.

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy/deputies will be aware of contact details and referral routes in the local housing authority so they can raise/progress concerns at the earliest opportunity. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM: the DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include: a pupil confiding in a professional that FGM has taken place; a mother/family member disclosing that FGM has been carried out; a family/pupil already being known to social services in relation to other safeguarding issues; and a girl having difficulty walking, sitting or standing; finding it hard to sit still for long periods; spending longer than normal in the bathroom; having frequent urinary, menstrual or stomach problems; avoiding physical exercise or missing PE; being repeatedly absent from school; demonstrating increased emotional and psychological needs; being reluctant to undergo medical examinations; asking for help without being explicit about the problem; or talking about pain or discomfort between her legs.

Potential signs that a pupil may be at risk of FGM include a family history of practising FGM; 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; a girl having a mother, older sibling or cousin who has undergone FGM; having a limited level of integration

within UK society; confiding that she is to have a 'special procedure'; talking about a long holiday to a country where the practice is prevalent; requesting help because she suspects she is at immediate risk; talking about FGM in conversation; being unexpectedly absent from school; or having sections missing from her 'red book' or attending a travel clinic for relevant vaccinations. 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 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used, applying 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 and then report this to the DSL.

The DSL will speak to the pupil about the concerns in a secure and private place; activate the local safeguarding procedures and refer the case to the local authority's designated officer; seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk; and refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups, or the process of a person legitimising support for, or use of, terrorist violence. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs, and also includes calling for the death of members of the armed forces. Terrorism is an action that endangers or causes serious violence to people, causes serious damage to property, or seriously interferes with or disrupts an electronic system, where the use or threat is designed to influence the government or intimidate the public for a political, religious or ideological cause.

Schools have to be alert to the need to prevent people from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify susceptible children. We will assess the risk of children in our school being drawn into terrorism, based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force. We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology; radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour, drawing on signs identified by the government website Educate Against Hate and the charity NSPCC, such as refusal to engage with peers who are different, becoming susceptible to conspiracy theories, changes in friendship groups, isolating themselves, an unwillingness to discuss their views, increased secretiveness around internet use, and accessing or possessing extremist material. It is important to note that these signs can also be part of normal teenage behaviour, but 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.

Sexual violence and sexual harassment between children in schools/colleges

The school/college 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 they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent, and A does not reasonably believe that B consents.
- Sexual assault: a person (A) commits an offence if they intentionally touch another person (B), the touching is sexual, B does not consent, and A does not reasonably believe that B consents. This 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 they intentionally cause another person (B) to engage in a sexual activity, B does not consent, and A does not reasonably believe that B consents, for example, forcing someone to strip, touch themselves sexually, or 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.

Harmful sexual behaviour (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; and online and face to face (both physically and verbally). HSB exists on a continuum and may escalate into sexual harassment or sexual violence, and 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, updating policies with lessons learnt; look out for potential patterns of concerning, problematic or inappropriate behaviour; consider if there are wider cultural issues within the school that enabled inappropriate behaviour to

occur; and remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, showing 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); and recognising the intersection of misogyny/misandry and harmful sexual behaviour. It is 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, sections 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Serious violence is a continuing safeguarding concern which may involve physical assault; carrying, threatening with or using weapons (often in the context of peer conflict or bullying); and criminal exploitation.

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include increased absence from school; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm or a significant change in wellbeing; signs of assault or unexplained injuries; and unexplained gifts or new possessions.

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; having been involved in offending, such as theft or robbery; being male; having experienced child maltreatment; having used drugs or alcohol in early adolescence; and having previously been a victim or perpetrator of violence.

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, considering wider information or concerns and taking appropriate action; put in place a safety and support plan for the pupil, depending on the risk; and, 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 and to leave their belongings, including their mobile phone(s), in a safe place during their visit. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter, and

visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and either their DBS certificate, checked alongside their photo ID, or written confirmation from the sending organisation that an appropriate level of DBS check has been carried out. All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day: our pupils are transported by taxis, should there be an issue with community transport. We would make relevant contact with parents/carers using information on SIMS. If no one is able to collect, we would provide an alternative method with payment to get home. If necessary, social care will be informed.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. For a child missing from education, we would ring the numbers that we have, carry out home visits for the first three days, and then refer to 'Children missing from education'. For a child missing from school who has a history of child protection involvement, we would make a home visit on day one if we couldn't get a response from home, and refer to the MACH if needed.

Approval and adoption

The policy is noted and adopted by the local governing bodies of the schools and colleges at their September meetings.