



Safeguarding and Child Protection Policy

St Paul's CE Primary Academy

Date Agreed:	September 2026
Review Date:	September 2027
Type of Policy:	DCAT Statutory Policy

Revision Number	Date Issued	Prepared by	Approved	Personalised by school	Comments
1	September 2023	Angela Corbett	September 2023		DCAT model policy tailored to meet school for KCSIE 2023
2	September 2024	Angela Corbett	September 2024		DCAT model policy tailored to meet school for KCSIE 2024
3	September 202b5	Angela Corbett	September 2024		DCAT model policy tailored to meet school for KCSIE 2025
4	September 2026	Angela Corbett	September 2026		DCAT model policy tailored to meet school for KCSIE 2026

Type of Policy	Tick ✓
DCAT Statutory Policy	✓
DCAT Non-statutory Policy	
DCAT Model Optional Policy	
Academy Policy	
Local Authority Policy	

KCSIE 2026 changes include (see KCSIE Annex C for full details):

- The simpler version of Part One, previously set out in Annex A, has been removed. The additional information on safeguarding issues is now Annex A and the DSL job description Annex B (this too has been amended, primarily in relation to the responsibilities of information sharing).
- The section on online safety, which includes the revised definitions of the 4 Cs of online safety and also refers to safeguarding and AI, has expectations for oversight of filtering and monitoring and cybersecurity
- Reference to early years and safeguarding and the increased safeguarding and welfare requirements (section 3) of the EYFS 2026 statutory framework
- New sections on sport, toilets and changing rooms and showers (secondary only), young carers, medical needs conditions, LGBT, gender questioning, use of images and video.
- Children who are young carers, now considered as vulnerable and therefore identified for support, if needed.
- Updated guidance on record keeping and sharing information with transfer schools.
- Revision relating to changes based on Working Together, including role of Family Help, which is now a new section.
- Additional requirements for ensuring safeguarding in alternative provision – this aligns to the February 2026 guidance for schools [Alternative provision - GOV.UK](#). The DfE have also published (31 August 2026) voluntary standards for unregistered provision [Non-school alternative provision: voluntary national standards - GOV.UK](#) – schools may wish to make use of these if they place a child in such provision.
- Restrictive interventions updated guidance referred to and text amend to align with the updated DfE guidance [Use of reasonable force in schools - GOV.UK](#) which came into force on 1 April 2026.
- Data Protection (new section in policy).
- Volunteers (new section in policy) to cover revised guidance for volunteers following Crime and Policing Act coming into force in April, removal of supervised category for volunteers. Essentially all volunteers who come into contact with pupils more than three in 30 days across multiple organisations require an enhanced DBS check. A barred list check should be undertaken for existing volunteers or any who meet the regulated activity threshold need to have an enhanced DBS check.
- Trainee teachers included in Part 4 guidance relating to allegations and concerns against staff.
- Increased focus on domestic violence and use of Operation Encompass
- Significantly revised part 5 for dealing with sexual harassment and sexual violence, focus now on early identification and action to prevent such behaviours from escalating into sexual abuse.

Other changes made for 2026

- Clarified the child leaving and joining a school procedures for child protection information sharing.

Key Contacts

Role	Name	Contact details
Designated Safeguarding Lead	Kim Morley	01424 424530 kmorley@stpaulsceacademy.org
Deputy Designated Safeguarding Lead	Peter Trimmings	01424 424530 ptrimmings@stpaulsceacademy.org
Designated Teacher for Looked After Children	Ian Smith	01424 424530 ismith@stpaulsceacademy.org
Headteacher/Principal	Maria Kiniari / Tom Glenn	mkiniari@stpaulsceacademy.org tglenn@stpaulsceacademy.org
Nominated governor for Safeguarding	Martin Crick	Mcrick@stpaulsceacademy.org
Chair of Local Governing Board	Piers Claughton	Pclaughton@stpaulsceacademy.org
Trust DSL Team		
DCAT Lead DSL Head of Safeguarding	Dominique Ivil	divil@dcacat.academy trustdsl@dcacat.academy Telephone: 07871 636379
DCAT Deputy DSL CEO	Mark Talbot	mtalbot@dcacat.academy trustdsl@dcacat.academy Telephone: 07597 652316
Chair of Trust Board	Rev Dr Jack Dunn	jdunn@dcacat.academy
Safeguarding Link Trustee	Nick Wilkinson	nwilkinson@dcacat.academy
East Sussex		
Local Authority Designated Officer (LADO)	Website: Children's LADO referral form East Sussex County Council Contact numbers: 07825 782793 and 01323 466606	
Channel Helpline	Website: Refer to Prevent - professionals Safe in East Sussex Email: preventreferraleastsussex@sussex.pnn.police.uk National Police Prevent Advice Line: 0800 011 3764 ACT Early Support Line: 0800 011 3764	
Referrals into Early Help and Social Care – Single Point of Advice	Telephone: 01323 464 222 Monday to Thursday 8.30 am to 5 pm and Friday 8.30am to 4.30pm. Email: Single Point of Advice team	

Emergency Duty Service – after hours, weekends and public holidays	Use the form (link below) to submit an allegation or safeguarding concern to the Children’s LADO about an adult who works with children. Website: Children's LADO referral form East Sussex County Council If the child is at immediate risk of harm, do not use the form - instead, contact the emergency services on 999 or contact the Single Point of Advice team. Telephone: 01273 335905
--	---

Contents

1.	Trust Statement of Intent.....	1
2.	Safeguarding and Child Protection arrangements	1
3.	Policy aims	2
	Prevention of harm	2
4.	Policy Statement.....	2
5.	Safeguarding definitions.....	3
6.	DCAT Centre Team and Trustees	4
7.	Legislation and guidance.....	4
8.	Human Rights and Equality Statement.....	6
9.	Data protection statement	7
10.	Contextual safeguarding	7
11.	Associated safeguarding policies.....	8
12.	Roles and responsibilities of staff and other adults	9
	The Deputy Designated Safeguarding Lead.....	10
	The Headteacher	11
	Trustees and Local Governing Body	11
	Teaching and support staff	12
	Contracted and supply staff.....	13
	Visitors	13
13.	Staff, Trustee and Governor training.....	13
14.	Staff support and supervision.....	14
15.	Staff code of conduct and safe working practices	15
16.	Indicators of abuse and neglect	15
17.	Understanding the views of children	17
18.	What staff should do if they have concerns about a child	17
19.	Notifying parents and carers of safeguarding concerns.....	19
20.	Notifying the Trust DSL team of safeguarding concerns	19
21.	Taking action when a concern is identified	20

22.	Community based Early Help assessments.....	21
23.	Statutory children's social care assessments and services	22
24.	Multi-agency working	22
25.	Record keeping.....	23
	Recording a concern	23
	Managing case records	24
26.	Information sharing and confidentiality	24
27.	Child leaving or joining the school.....	25
	Child leaving the school	25
	Child joining the school	25
28.	Child-on-Child Abuse.....	26
29.	Female genital mutilation (FGM)	27
30.	Preventing radicalisation	28
	Risk assessment	28
	Staff Training	28
	Pupil awareness and learning	28
	Protocol for acting on a concern	29
31.	Children at increased risk and/or are more vulnerable	29
	Children absent from education	29
	Children who are homeless	30
	Children in the courts and/or criminal justice system	30
	Looked after children, previously looked after children and care leavers.....	30
	Children with special educational needs and disabilities	31
	Children who need a social worker	31
	Children requiring mental health support.....	31
	Children with health issues, including allergies.....	32
	Young carers	33
	Children who are lesbian, gay, bisexual	33
	Children who are gender questioning	33
32.	Online safety	34
	School approach to online safety	34
	Online safety learning	35
	Filtering and monitoring	35
	Mobile phones	36
	Generative artificial intelligence	36
	Use of images, videos and using CCTV	36
	Information security and access management	37
33.	Curriculum opportunities to teach safeguarding.....	37
34.	Restrictive interventions, including the use of reasonable force	39
35.	Staff Wellbeing.....	39
36.	Safer recruitment	40
37.	Volunteers	40

38.	Ongoing vigilance	41
39.	Raising concerns about a member of staff or adult in the school	41
40.	Raising concerns about safeguarding practices & whistleblowing.....	43
41.	Remote education.....	43
42.	Alternative provision.....	43
43.	Elective home education.....	44
44.	Regulations and safeguarding requirements relating to school premises	44
45.	Use of school premises by outside organisations and individuals	45
46.	Children staying with host families	45
47.	Private fostering	46
48.	Site security and visitor arrangements	46
	Site security.....	46
	Visitor arrangements	47
49.	Complaints	47
50.	Safeguarding monitoring arrangements.....	47
51.	Review period.....	48
Appendix A	– What to do if a member of staff has a safeguarding concern about a child	49
Appendix B	- Categories of Abuse.....	50
Appendix C	- Specific safeguarding issues (KCSIE Annex A)	52
	Child abduction and community safety incidents	52
	Child criminal exploitation (CCE) and child sexual exploitation (CSE)	53
	County lines	54
	Children and the court system	55
	Children who are absent from education.....	55
	Children with family members in prison	55
	Cybercrime.....	55
	Domestic abuse.....	56
	Homelessness	59
	Modern slavery and the National Referral Mechanism	60
	Preventing radicalisation	60
	Serious violence	62
	Honour or faith-based abuse (including female genital mutilation and forced marriage)	64
	FGM mandatory reporting duty for teachers	64
	Forced marriage.....	65
	Additional advice and support.....	65
Appendix D	– Guidance for schools on child-on-child abuse policy contents.....	66

Introduction

Our **vision** for our Trust is we exist to:

Help every child achieve their God-given potential

Our **aims** are clear. We aim to be a Trust in which:

Developing the whole child means pupils achieve and maximise their potential

Continued development of staff is valued and improves education for young people

All schools are improving and perform above national expectations

The distinct Christian identity of each academy develops and is celebrated

Our work as a Trust is underpinned by shared **values**. They are taken from the Church of England's vision for Education and guide the work of Trust Centre team. They are:

Aspiration

I can do all things through Christ who strengthens me
(Philippians 4 vs 13).

Wisdom

Listen to advice and accept discipline, and at the end you will be counted among the wise
(Proverbs 19 vs 20)

Respect

So in everything do to others what you would have them do to you
(Matthew 7 vs 12)

Our vision of helping every child achieve their God-given potential is aligned with the Church of England's vision for education and is underpinned by the Bible verse from John: *I have come that they may have life, and have it to the full.*

Within this vision of helping every child achieve their God-given potential, safeguarding is fundamentally about creating and sustaining a life-affirming environment. The key components are rules and procedures with which we must all comply. But compliance does not realise our vision on its own. Effective safeguarding relies on every member of staff contributing, through our words and actions, to the positive culture of relationships in which all pupils can flourish and experience Jesus' promise of "*life in all its fullness*" (John 10 vs 10)

1. Trust Statement of Intent

The Diocese of Chichester Academy Trust (DCAT) has a clear vision which is helping every child achieve their God-given potential. Fundamental to this is that children within our care are safe and happy. Our Trust is committed to ensuring that we promote the highest standards of welfare, both physical and emotional, for children at all of the DCAT academies. We will aim to do this by:

- creating a culture of safe recruitment by adopting a procedure of robust interviewing, screening and checks to deter or identify people who may pose a risk to children
- having in place clear and understood systems and processes which safeguard children
- providing high quality and up-to-date training for staff, governors and Trustees
- ensuring children feel empowered to recognise concerns and speak out if they are worried
- ensuring that we work alongside our professional partners to achieve the best outcomes for all our children
- working in an open and honest way with our parents/carers
- St Paul's CE Primary Academy will publish the Safeguarding and Child Protection policy on the school website. Parents and carers may also request a paper copy of the policy.

2. Safeguarding and Child Protection arrangements

The Diocese of Chichester Academy Trust (DCAT) requires each academy to have a robust Safeguarding and Child Protection policy which is fully aligned with Keeping Children Safe in Education 2026 and local guidance from East Sussex, West Sussex, Hampshire and Bournemouth, Christchurch and Poole Local Authorities.

St Paul's CE Primary Academy will publish the Safeguarding and Child Protection policy on the school website. Parents and carers may also request a paper copy of the policy.

St Paul's CE Primary Academy will meet the following DCAT safeguarding requirements:

- every member of staff will read and sign that they have understood and will follow Keeping Children Safe in Education (KCSIE) Part 1 and Annex A
- every local governor and Trustee to read and sign that they have understood Keeping Children Safe in Education (KCSIE) Part 1 and Part 2 and Annex A
- every member of staff undertakes annual high-quality safeguarding and child protection training, including in online safety, commensurate with their role and responsibilities
- annual high-quality safeguarding and child protection training, including in online safety, is provided for all Local Governing Body members
- a representative(s) will monitor the school's safeguarding arrangements, this includes systems for filtering and monitoring and regularly checking the Single Central Record (SCR).
- safeguarding is covered at Local Governing Body meetings

- the DSL to provide a written report 3 times a year to the Local Governing Body
- leaders undertake an annual audit of safeguarding, including online safety.

Further information regarding DCAT's safeguarding practices can be found in the DCAT Employee Handbook and HR policies.

3. Policy aims

The aims of this policy are to:

- Establish a safe environment in which children can learn and develop
- Provide all members of the St Paul's CE Primary Academy with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children
- Ensure consistent good practice across St Paul's CE Primary Academy
- Demonstrate DCAT's and St Paul's CE Primary Academy commitment to safeguarding children

Prevention of harm

The Trust and St Paul's CE Primary Academy recognise that its schools play a significant part in the prevention of harm by providing pupils with good lines of communication with trusted adults and an ethos of protection. Each school in the Trust will therefore:

- establish and maintain an ethos where pupils feel secure, are encouraged to talk and are always listened to;
- ensure that all pupils know there is an adult in the school whom they can approach if they are worried or in difficulty;
- include in the curriculum opportunities that equip pupils with the skills they need to stay safe from harm and to know who they should turn to for help.

4. Policy Statement

The Trust and St Paul's CE Primary Academy are committed to safeguarding children and young people and everyone who works for DCAT and St Paul's CE Primary Academy, including trustees and governors, are expected to share this commitment.

Safeguarding and promoting the welfare of children is **everyone's** responsibility and applies to all employed staff as well as contracted and supply staff working at St Paul's CE Primary Academy and any of the Trust's schools.

Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action. Children includes everyone under the age of 18.

Safeguarding and promoting the welfare of children is defined (as set out in [Keeping Children Safe in Education 2026](#)) (KCSIE) for the purposes of this policy as:

- **protecting** children from maltreatment
- **preventing** impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the **provision** of safe and effective care
- **taking action** to enable all children to have the best outcomes.

Our safeguarding and child protection policy is based on:

- **Prevention**
establishing a positive, supportive, safe school culture, curriculum and pastoral opportunities for all pupils, and safer recruitment procedures
- **Protection**
following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to all safeguarding concerns
- **Support**
providing for all pupils, parents and staff, and where appropriate specific intervention for those who may be at risk of harm
- **Working with parents/families and other agencies** ensuring appropriate communications and actions are undertaken with families, our safeguarding partners and other agencies, professionals and organisations.

5. Safeguarding definitions

'Safeguarding' is defined in the [Children Act 2004](#) as protecting from maltreatment; preventing impairment of health and development; ensuring that children grow up with the provision of safe and effective care; and work in a way that gives the best life chances and transition to adulthood.

'Child protection' is an aspect of safeguarding but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

KCSIE (paragraph 3) defines safeguarding as:

- 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
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

The term **'staff'** applies to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity. This also includes parents, volunteers and members of the Local Governing Body.

‘Child’ refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to pupils on roll at St Paul’s CE Primary Academy, however, the policy will extend to visiting children from other establishments and also those using the premises from outside organisations.

‘Parent’ refers to birth parents and other adults in a parenting role, this covers adoptive parents, step-parents, guardians and foster carers.

‘Abuse’ could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care.

‘Victim’ is a widely recognised and understood term. Schools recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. We are conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

‘Perpetrator(s)’ for the purpose of this policy (in line with KCSIE), we use the term, in places, use the term **‘alleged perpetrator(s)’** and where appropriate **‘perpetrator(s)’**. These are widely used and recognised terms. At St Paul’s CE Primary Academy we think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.

‘Nudes and semi-nudes, including where generated by AI’ for the purposes of this guidance, the term **‘making or sharing nudes and semi-nudes’** refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term **‘images’** includes all visual content, such as photographs, videos and livestreams. The term **‘nudes’** is the most widely understood by young people and best captures the full range of image-sharing behaviours covered in this guidance. Images may be taken by the child themselves (sometimes referred to as ‘self-generated imagery’) or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as ‘deepfakes’ or ‘deep nudes’.

6. DCAT Centre Team and Trustees

The Trustees and DCAT Centre Team have all undergone the appropriate safeguarding checks, which are recorded on the DCAT Single Central Record. The Trust uses a central record, called Arbor, which holds the records of staff recruitment for all schools. Each school is able to view their staff and governor employment check records, together with those of the Centre Team and Trustees.

7. Legislation and guidance

This policy has been developed in accordance with the principles established by the Children Acts [1989](#) and [2004](#) and related guidance. This includes:

- [Keeping Children Safe in Education 2026](#)
- [Working together to safeguard children](#) (republished March 2026)

- [Allergy in schools](#) (New guidance, July 2026)
- [Behaviour in schools](#) (updated June 2024)
- [Children's social care national framework](#) (updated July 2026)
- [Early Years and Foundation Stage Framework \(EYFS\)](#) (revised July 2026 effective from 1 September 2026)
- [Data Protection guidance for schools](#) (numerous guidance documents linked to Data Protection)
- [Generative artificial intelligence \(AI\) in education](#) (June 2025 updated August 2025)
- [Inclusion bases in schools guidance](#) (new guidance, June 2026)
- [Information sharing for safeguarding practitioners](#) (May 2024)
- [Martyn's law for education settings - GOV.UK](#) (October 2025)
- [Meeting digital and technology standards in schools and colleges](#) (last updated June 2026)
- [Multi-agency statutory guidance on female genital mutilation](#) (July 2020)
- [Non-school alternative provision: voluntary national standards - GOV.UK](#) (September 2025)
- [Ofsted: Education Inspection Framework](#) (November 2025)
- [Ofsted School inspection toolkit and operating guide](#) (In place November 2025 updated June 2026)
- [Online safety guidance for staff](#) (new - replaces cyberbullying guidance, July 2026)
- [Mobile phones in schools](#) (June 2026 – new guidance, became statutory on 29 June 2026)
- [Preventing bullying](#) (updated July 2026)
- [Preventing and tackling the bullying and harassment of school staff](#) (new guidance, published July 2026)
- [Promoting and supporting mental health and wellbeing in schools and colleges](#) (published June 2021, updated April 2026)
- [Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension](#) (March 2024, last updated September 2025)
- [Protecting your setting's images from AI manipulation and abuse](#) (published 2026 by UK Safer Internet Centre; guidance developed by UK Online Harms Early Warning Working Group members)
- [Relationships and sex education \(RSE\) and health education](#) (last updated December 2025, teaching from 1 September 2026)
- [Restrictive interventions, including use of reasonable force, in schools](#) (Updated/revised December 2025, new title, came into force on 1 April 2026)
- [Sharing nudes and semi nudes advice for education settings working with children and young people](#) (March 2024)
- [Sharing nudes and semi-nudes: how to respond to an incident \(overview\)](#) (March 2024)
- [School suspensions and permanent exclusions](#) (updated June 2026)
- [Taking and using photos and videos, and using CCTV in school](#) (published February 2023, updated July 2026)

- [The Education \(Independent School Standards\) Regulations](#) (2014) (guidance revised April 2026)
- [The Non-Maintained Special Schools \(England\) Regulations 2015](#)
- [The Prevent Duty Guidance](#) (Last updated January 2024 and came into force on 1 January 2024)
- [What to do if you're worried a child is being abused: advice for practitioners \(Published in 2015\)](#)
- [Working together to improve attendance](#) (last updated July 2026)

Section 175 of the [Education Act 2002](#) requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are pupils under 18 years of age. Such arrangements will have regard to any guidance issued by the Secretary of State.

Other legislation this policy is based on:

- [Children's Act 1989](#) (and [2004 amendment](#)),
- [Children's Wellbeing and Schools Bill 2026](#)
- [Crime and Policing Act 2026](#)
- [Data Protection act 2018](#), the [UK GDPR](#) and the [Data \(Use and Access\) Act 2025](#) (collectively known as 'data protection laws')
- [Female Genital Mutilation Act 2003](#), as inserted by [section 74 of the Serious Crime Act 2015](#) (Section 5B (11))
- [Rehabilitation of Offenders Act 1974](#)
- [Schedule 4 of the Safeguarding Vulnerable Groups Act 2006](#)
- [School Staffing \(England\) Regulations 2009](#)
- [The Marriage and Civil Partnership \(Minimum Age\) Act 2022](#)

8. Human Rights and Equality Statement

St Paul's CE Primary Academy is aware of its obligations under the [Human Rights Act 1998](#) (HRA), [Equality Act 2010](#) (including its Public Sector Equality Duty) and the local multi-agency safeguarding arrangements in East Sussex.

DCAT, the school's Local Governing Body and senior leaders recognise that, under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- Protocol 1, Article 2: protects the right to education.

DCAT and the school recognise that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

DCAT and all members of the school will adhere to the Equality Act, will not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

DCAT and the school will pay due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration is made to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.

The school follows the DCAT Human Rights and Equalities objectives set out in the HR and Employee Handbooks to meet the requirements of the Equality Act 2010 (2021) Human Rights Act and [Public Sector Equality Duty](#).

9. Data protection statement

DCAT centre staff, trustees, local governors and all staff will adhere to the three data protection laws to protect and safeguard staff and pupils. This will ensure that any personal data, including that related to child protection is stored securely and used fairly and lawfully,

DCAT and each school have appointed a data protection officer to oversee all aspects of data protection. The data protection procedures and policy are based on the [DfE Data protection guidance for schools](#) and guidance from the [Information Commissioners Office](#) including for any data breaches.

10. Contextual safeguarding

All staff at St Paul's CE Primary Academy should be aware that safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside of this environment. This is known as contextual safeguarding, which means that assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (and deputies) should consider the context within which such incidents and/or behaviours occur. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families, for example: sexual exploitation, criminal exploitation and serious youth violence.

Children's social care assessments should consider such factors, so it is important we provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

11. Associated safeguarding policies

This policy is one of a suite of policies, reflecting the whole school approach to safeguarding. It should be read and actioned in conjunction with the policies listed below:

- Allergies policy
[Allergy safety in schools - GOV.UK](#)
- Anti-Bullying and/or child-on-child abuse policy
- Attendance and punctuality
- Behaviour management
- Curriculum policy
- Cyber incident response plan
- Data protection policy
- Early Years
[Early years foundation stage \(EYFS\) statutory framework: summary of the safeguarding and welfare requirements | NSPCC Learning](#)
- First aid policy
- Health and safety policy
- Image use policy
[Taking and using photos and videos, and using CCTV in schools](#)
- Lettings policy to include use of premises by other organisations
- Mobile phone policy
[Creating a mobile phone-free environment: school case studies - GOV.UK](#)
- Online safety policy
- Personal and intimate care policy
- Personal, social and health education (PSHE)
- Prevent Policy risk assessment
- Relationships and Sex Education (RSE)
- Remote Learning
- Safer recruitment procedures set out in the DCAT Recruitment and Selection Policy
- Searching, screening and confiscation
- Social media and mobile technology, including reference to online reputation
- Special educational needs policy
- Staff code of conduct set out in the DCAT Employee Handbook

- Staff disciplinary policy
- Supporting pupils with medical needs
- Restrictive interventions, including the use of reasonable force
[*Restrictive Intervention Protocol and supporting documentation*](#)
- Whistleblowing

12. Roles and responsibilities of staff and other adults

Any member of staff undertaking the role of DSL or DDSL must have this explicitly written in their job description held on their personnel file as indicated below.

The Designated Safeguarding Lead (DSL)

Each school in the Trust has a DSL, who is also a member of the school's senior leadership team. The DSL will:

- take lead responsibility for safeguarding and child protection across the school (including online and digital safety)
- take part in strategy discussions and inter-agency meetings and contribute to the assessment of children
- advise and support other members of staff on child welfare, safeguarding and child protection matters, and liaise with relevant agencies and safeguarding partners including the Local Authority, health and Police
- lead on raising safeguarding awareness with all stakeholders
- responsible for ensuring child protection files are kept up to date and any sharing of information happens in accordance with KCSIE 2026
- some safeguarding activities may be delegated to deputies, but the DSL will retain ultimate lead responsibility and oversight for safeguarding and child protection.

The DSL and deputies should liaise with the three safeguarding partners (the Local Authority; a clinical commissioning group for an area within the Local Authority; and the Chief Officer of Police for the police area in the Local Authority area) and work with other agencies in line with Working Together to Safeguard Children.

DSL Availability

During term time, the DSL and/or Deputy DSL, will be available (during school hours) for staff in the school to discuss and deal with any safeguarding concerns. This will be in person, in very exceptional circumstances this maybe by telephone and/or Microsoft Teams or other such acceptable media.

Our Extended Schools Manager and Operations Manager are both DSL trained meaning that there is always a DSL available for summer schools, clubs and contractors.

The Deputy Designated Safeguarding Lead

The Deputy DSL will:

- deputise for the DSL in their absence
- support the DSL in their responsibility for safeguarding and child protection across the school (including online and digital safety)

- take part in strategy discussions and inter-agency meetings and contribute to the assessment of children.
- advise and support other members of staff on child welfare, safeguarding and child protection matters, and liaise with relevant agencies and safeguarding partners including the Local Authority, health and Police
- lead on raising safeguarding awareness with all stakeholders
- ensure child protection records and files are detailed, kept up to date and any sharing of information happens in accordance with KCSIE 2026

See KCSIE 2026 Annex B for the full job description of the DSL and DDSs.

The Headteacher

The Headteacher will:

- ensure that the Safeguarding and Child Protection policy, and procedures, including those for online safety, are implemented and followed by all staff
- allocate sufficient time and resources to enable the DSL and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures.

Trustees and Local Governing Body

The DCAT Trustees and Local Governing Body will ensure that the school has:

- a DSL for safeguarding and child protection who is a member of the senior leadership team and has undertaken the appropriate training
- given the DSL (and any deputies) the additional time, funding, training, resources, and support needed to carry out the role effectively. They will also ensure there is adequate cover if the DSL is unavailable and that any staff supporting or deputising for the DSL will have access to a safeguarding shared school email and MyConcern, so that no safeguarding concerns/issues raised by staff, parents/carers or the Local Authority are missed and can be dealt with promptly.
- Safeguarding and Child Protection policy and [DCAT safeguarding procedures](#), including those for online safety, in place which are consistent with the Local Safeguarding Children Partnership requirements, effectively implemented, reviewed annually and available on the school's website
- a systematic and robust approach for monitoring safeguarding arrangements and providing support to the DSL in line with Part 2 KCSIE 2026. This will include visits to school, regular contact with the DSL and other staff working to protect children and reviewing information provided to them concerning pupils' welfare and safety, including for online safety. Governors will also seek the views of pupils, staff and parents/carers as part of their monitoring arrangements to check on the effectiveness of safeguarding arrangements

- arrangements for reviewing the checks made on the school's filtering and monitoring systems
- procedures for dealing with allegations of abuse made against members of staff including allegations made against the Headteacher
- safer recruitment procedures that include the requirement for appropriate checks in line with national guidance
- a training strategy that ensures staff at all levels and in all roles, including the Headteacher, receive appropriate safeguarding training, including online safety
- arrangements to ensure that all temporary staff and volunteers are made aware of the school's arrangements for child protection and safeguarding
- appropriate safeguarding and child protection (including online) training in place for all governors at induction, which is regularly updated, to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding
- awareness of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

Teaching and support staff

All staff, regardless of their role, at St Paul's CE Primary Academy have a responsibility to provide a safe environment in which children can learn and all staff should be prepared to identify children who may benefit from early help.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

All staff should:

- wear school lanyard and identity badge at all times
- receive appropriate safeguarding and child protection training, including in online safety, which is regularly updated
- know what to do if a pupil tells them he/she is being abused or neglected
- know how to manage the requirement to maintain an appropriate level of confidentiality
- never promise a pupil that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child
- refer all concerns/incidents reported to them to the DSL/member of the safeguarding team and make a record of this on MyConcern
- be aware that safeguarding incidents could happen anywhere and be alert to possible concerns then being raised in school
- press for reconsideration if a pupil's situation does not appear to be improving following a referral
- support social workers and other agencies following any referral

- be aware of the school's systems that support safeguarding, such as Community Based Early Help and Children's Services Social Care Assessment, knowing how to identify early signs of potential harm and reporting these using MyConcern so the DSL can act.

Any staff member who has a concern about a child's welfare must:

- notify the DSL at the earliest opportunity following the referral/reporting processes set out in [Section 18](#) of this policy
- raise concerns with children's social care directly if they believe there is a risk of immediate serious harm to the child directly.

For example:

- a. on return from a school trip in the early hours of the morning
- b. if they believe that the DSL (and deputies) have not contacted social care following a disclosure / serious concern
- c. a pupil makes a disclosure to them off site and out of hours

Although these situations are highly unlikely it is important that staff remember that the safety of children is of paramount importance.

Staff must also notify the DSL of their concerns and actions at the earliest opportunity, this includes making a full written report in line with the school's processes.

Direct contact details for Children's Services can be found on page 2 (2-3) of this policy.

Contracted and supply staff

Any contracted and supply staff are made aware of the school's safeguarding systems on their first arrival in school. They are expected to follow school procedures should they have a concern about a child or another member of staff or safeguarding practices at the St Paul's CE Primary Academy.

Visitors

All visitors to St Paul's CE Primary Academy are provided with information on an iPad as they sign in, detailing the school's safeguarding procedures on arrival. They are expected to follow school procedures should they have a concern about a child, a member of staff, any another adult or safeguarding practices at St Paul's CE Primary Academy.

13. Staff, Trustee and Governor training

All staff in the Trust must undergo safeguarding and child protection training, including in online safety, at induction. This training will be regularly updated and be ongoing throughout the school year to keep the profile of safeguarding high and ensure pupils are effectively safeguarded.

In addition, all staff will receive regular safeguarding and child protection updates, these may come through email, information bulletins, presentations, staff meetings and online sessions.

These will be strategically planned so that over time staff will broaden their knowledge and understanding of safeguarding commensurate to their roles

All staff will also receive annual training in online safety, this will include understanding roles and responsibilities in relation to filtering and monitoring, and also cover the use of artificial intelligence (AI) and cyber security awareness.

Staff will also receive training in Prevent every 2 years.

The DSL and deputies will receive appropriate DSL level training every two years, along with any additional training to support whole school safeguarding culture and practice. This will involve training in all aspects of online safety, including in awareness of filtering and monitoring and safeguarding aspects of the use of generative AI. Training for DSLs and deputies, will be strategically planned to build knowledge and expertise over time, and be adaptable to emerging safeguarding concerns at school, local and national level.

All DCAT Trustees, and members of St Paul's CE Primary Academy Local Governing Body will receive annual safeguarding training, including in online safety, plus training on specific issues at least three times a year. This will be strategically planned so that all governors develop expertise over time, so they actively monitor and check on the effectiveness of safeguarding arrangements in their schools.

All staff at St Paul's CE Primary Academy are expected to read at the start of each school year, or at the time of appointment as part of their induction:

- KCSIE Part 1 & Annex A
 - Safeguarding and Child Protection policy
 - DCAT Employee Handbook which includes the staff code of conduct
 - Behaviour policy
- Online Safety policy
- Know the name and roles of the Designated Safeguarding Lead (DSL) and their deputies.
- How to use myconcern to enter any concerns
- Prevent policy

The DSL will actively monitor and check on the effectiveness of safeguarding arrangements in their schools.

14. Staff support and supervision

The DSL will make all staff aware that support and advice is available to them. Staff should seek support from the DSL, their line manager or a senior member of staff if they feel distressed or upset following a disclosure made by a child. The DSL or a senior member can put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union or other similar organisations directly.

The St Paul's CE Primary Academy will ensure that members of staff who are working with foundation stage children are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) Framework (July 2026, effective from September 2026).

All DSLs are offered termly supervision sessions, led by the DCAT Head of Safeguarding. The DCAT Head of Safeguarding is also available throughout the year to provide advice, guidance and support to DSLs in relation to the management of individual cases.

All newly appointed DSLs will receive a comprehensive induction programme to support them in their new role and ensure they are familiar with DCAT policies, procedures and safeguarding arrangements. In addition, newly appointed DSLs will receive enhanced support from the DCAT Head of Safeguarding to help them develop confidence in their role and understand their responsibilities.

15. Staff code of conduct and safe working practices

DCAT expects all employees to recognise their obligations to the Trust, St Paul's CE Primary Academy, the public, pupils and other employees and to conduct themselves properly at all times and in accordance with the DCAT code of conduct (Section 2, DCAT Employee Handbook) and all other policies and procedures both on and away from the school's premises. The disciplinary procedures are set out in [DCAT Disciplinary Policy](#) should the conduct of any member of staff fall below these standards. For low level concerns and allegations of abuse against pupils, the procedure is set out in the [DCAT Managing Allegations against staff procedure](#).

All members of staff are required to work within our clear guidelines on safer working practice as outlined in the DCAT Employee Handbook. Aspects of working practice covered include dress code, driving, use of Trust vehicles and home visits

Staff must adhere to DCAT and St Paul's CE Primary Academy policies including for physical restraint, the use of computers, social media and electronic communication (such as email, mobile phones, texting, social networking) as set out in the Online Safety policy and the Employee Handbook.

16. Indicators of abuse and neglect

All staff at St Paul's CE Primary Academy are made aware of the definitions and indicators of abuse and neglect, as identified by Working Together to Safeguard Children (2026) and Keeping Children Safe in Education (KCSIE) 2026.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Also, that behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos, can be signs that children are at risk.

There are four categories of abuse, neglect and exploitation set out in KCSIE 2026 paragraphs 18-28 and in [Appendix B - Categories of Abuse](#), these are:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

In addition, KCSIE describes the following specific forms of abuse and safeguarding:

- Child abduction and community safety incidents
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- Children and the court system
- Child-on-child abuse (including cyberbullying, racial, prejudicial and discriminatory bullying)
- Children missing/absent from education
- Children with family members in prison
- County Lines
- Cybercrime
- Drug taking and/or alcohol misuse
- Domestic abuse
- Gangs and youth violence
- Gender based abuse and violence against women and girls (VAWG) Homelessness
- Honour based abuse (including FGM and forced marriage)
 - Making & sharing nudes and semi-nudes (including those generated by AI)
- Mental health
- Modern slavery & the National Referral Mechanism
- Online safety (including awareness of the school's systems for filtering and monitoring)
- Preventing radicalisation, Prevent Duty and Channel
- Serious Violence
- Sexual violence and sexual harassment
- Upskirting

Further details can be found in KCSIE Annex A and in [Appendix C](#) of this policy.

All staff should be aware that:

- children can be at risk of harm inside and outside of the school, inside and outside of home and online
- harm can also include ill treatment that is not physical as well as the impact of witnessing ill treatment of others - this can be particularly relevant in relation to the impact on children of all forms of domestic abuse
- abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone - in most cases, multiple issues will overlap with one another.

Members of staff are aware that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.

All staff, but especially the Designated Safeguarding Lead (and deputies), should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse, exploitation and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, spreading misinformation, sharing conspiracy

theories, the non-consensual sharing of nudes and semi-nudes (see definition in section 5), especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and explored by the DSL (or deputies) on a case-by-case basis.

All members of staff are expected to be aware of and follow this approach if they are concerned about a child (taken from '[What to do if you are worried a child is being abused](#)' DfE 2015).

17. Understanding the views of children

It is important that all children at St Paul's CE Primary Academy feel heard and understood. Therefore, DSLs (and deputies) should encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them. Pupils should be informed of this culture and know that if they raise concerns they will be listened to and their views taken into account.

18. What staff should do if they have concerns about a child

Staff are expected to maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

If staff have any concerns about a child's welfare, they should act on them immediately and follow their individual school's referral/reporting process.

The DSL or a deputy should always be available to discuss safeguarding concerns during school hours. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should speak to a member of the Senior Leadership Team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.

Staff should not assume a colleague or another professional will take action and must therefore share any information that could prove critical in keeping a child or children safe.

Staff should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

Staff should never consider a concern to be too minor to share. If a member of staff is in any doubt about sharing information, they should speak to the Designated Safeguarding Lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of any child attending a school/academy name.

The [GDPR and Data Protection Act 2018](#) (data protection laws) do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

[Appendix A](#) provides a flow chart of what to do if a member of staff has a safeguarding concern about a child.

If a child discloses information to a member of staff

Staff should always be mindful that it takes a lot of courage for a child to disclose that they are being neglected and or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to staff about any risks to their safety or wellbeing, the staff member will need to let them know that the information **must** be passed on – staff are not allowed to keep secrets or tell a child that what they tell them will be treated as confidential.

The Designated Safeguarding Lead or a deputy should always be available to discuss safeguarding concerns during school hours. If in exceptional circumstances, such as out of school hours, the Designated Safeguarding Lead (or deputy) is not available, this should not delay appropriate action being taken. Staff must speak to a member of the Senior Leadership Team and/or take advice from Local Authority children's social care. In these circumstances, any action taken should be shared with the Designated Safeguarding Lead (or deputy) as soon as is practically possible. See contact details on page 2.

During a conversation with the child:

Staff should heed this advice when a child discloses alleged abuse.

- Allow the child to speak freely.
- Do not promise confidentiality. If what a child discloses is an allegation of abuse, staff have a duty to tell and will then have to betray the child's trust. Always explain that the school will need to talk to a designated member of staff who will keep the issue as confidential as possible.
- Remain calm and do not overreact – the child may stop talking if they feel the information they are disclosing is upsetting to staff.
- Take what the child says seriously. Do not show disbelief and keep an open mind. It is more likely than not that the child is telling the truth.
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'You are doing the right thing in talking to me'.
- Do not be afraid of silences – remember how hard this must be for the child.
- Listen, only asking questions when necessary to clarify. Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child's parent think about all this.
- Do not criticise the alleged abuser. Often an abused child has very confused feelings about the perpetrator and may still love the person whilst hating what has been done. Judgemental comments can evoke a sense of bewildering loyalty.
- Once the child has finished relaying what has happened, give reassurance: this kind of thing has happened to others and there are people who can help. No-one has to go through this experience alone.
- Tell the child what will happen next as far as possible. Answer any questions honestly; if staff are unable to answer a question, they should say this, and that they will try to find out.
- Never promise anything that cannot be delivered for certain. For example, do not promise that everything will work out fine or that the child will never have to face the abuser again. Staff can only promise to do their best to help. Reassure the child that they will be heard and supported.

- Write up the conversation as soon as possible and hand it to the designated person without delay, as it may not be appropriate for the child to return home at the end of the school day.

19. Notifying parents and carers of safeguarding concerns

St Paul's CE Primary Academy normally seeks to discuss any concerns about a child with their parents and carers, but this must be handled sensitively. However, if the school believes that notifying parents and carers could increase the risk to the child or exacerbate the problem, then advice will first be sought from children's social care and parents may not be contacted. A record of any discussions, decisions and their rationale will be kept on MyConcern.

20. Notifying the Trust DSL team of safeguarding concerns

All safeguarding must be recorded on the safeguarding software MyConcern, which the Trust can access.

However, there will be certain circumstances where the Trust DSL team should be specifically notified. These are:

1. Where the Headteacher, DSL or Deputy DSL have a 'conflict of interest' in a particular case, for example, they have a personal relationship to those involved
2. Where a concern/s have a significant reputational risk to the school or Trust i.e. something happening off of school property, when children are under the supervision of non-school staff or where there are multiple occurrences of the same type of concern over the short period of time are raised

(Examples could include: multiple child-on-child concerns in the same class in one term, child suicide or attempted suicide, a sextortion or child-on-child sexual abuse case that may involve the Police or inappropriate behaviour by a member of staff towards a child.)

3. Where a member of the school staff views that a safeguarding concern is not being dealt with appropriately or taken seriously enough by the school's safeguarding leads.

In such circumstances, the Headteacher, DSL (or deputies) or other staff member should not delay in contacting the Trust DSL team. There should be no delay in contacting the Trust Team, ideally this should be on the same day. See contact details on page 2.

By notifying the Trust DSL team the school can request support with handling a case/s.

In some limited and rare circumstances, the Trust DSL team may take over the handling of a case.

21. Taking action when a concern is identified

[Working Together to Safeguard Children](#) 2026 has been revised to reflect the importance of early identification and support for families, to improve a family's resilience and prevent emerging concerns from escalating. To support this key principle, staff at School/academy name are trained to be vigilant and report child protection concerns without delay so that they can be responded to promptly in line with [Working Together to Safeguard Children](#) section 3,

St Paul's CE Primary Academy will adopt a child centred approach in all assessments respecting the child's wishes / feelings and individual circumstances alongside the views and circumstances of parents and carers and when appropriate the wider family network.

What staff should look out for:

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

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

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

All staff should be aware of indicators of abuse and neglect (see [Appendix B](#)) so that they are able to identify cases of children who may need help or protection. Staff should also refer to [Appendix C](#) for details of specific safeguarding issues.

Staff must follow these key steps:

- report concerns to the DSL or another member of the safeguarding team as quickly as possible, and certainly before the end of the school day

- if a member of the safeguarding team is not available, ensure the information is shared with the most senior person in the school that day and ensure action is taken to report the concern to children's social care;
- not start their own investigation
- share information on a need-to-know basis only – not to discuss the issue with colleagues, friends or family
- complete a written record of concern using the MyConcern safeguarding reporting system - any handwritten notes, paper evidence, emails or other information must be scanned and attached to the electronic record
- staff should seek support if they are distressed – see [Section 35](#)
- in an emergency, take the action necessary to help the child – for contact details see the table of contacts on page 2 or in a serious emergency call 999

22. Community based Early Help assessments

If the DSL views that a Family Help assessment is appropriate, they or a member of the safeguarding team will lead on liaising with other agencies and to organise the assessment and ensure appropriate early help is put in place to support the child. Staff maybe asked to contribute to the assessment.

The DSL (or deputies) must follow the guidance on effective early help assessment set out in [Working Together to Safeguard Children](#) Chapter 3, paragraph 144, detailed below:

- be undertaken with the agreement of the child and their parents or carers, involving the child and family as well as the practitioners who are working with them
- include pre-birth assessment where needed
- take account of the child's wishes and feelings wherever possible which could include providing advocacy support where this is needed to enable a child to share their views, for example, if the child has communication difficulties due to a disability
- take account of the child's age, family circumstances and extra-familial contexts and whether these factors are contributing to or preventing good outcomes
- take account of the needs of all members of the family as individuals and
- consider how their needs impact on one another which includes considering needs relating to education, early years development, mental health and physical health, substance misuse, financial stability, housing, family relationships, domestic abuse and crime. Practitioners should be aware of situations where there has been a breakdown in relationship between the child and their family and engaging the whole family may not be appropriate
- cover both presenting needs and any underlying issues with the understanding that a family's needs can change overtime, for example, when a child moves up to secondary school
- be based on facts, and explore and build on strengths
- be clear about the action to be taken and services to be provided
- identify what help the child and family require to prevent needs escalating
- provide the basis for any future assessments if they are needed, for example, under sections 17 and 47 of the Children Act 1989.

Throughout the process of assessment, the DSL or assessment lead will take note to adhere to the guidance for providing help, support and protection as set out in chapter 3, sections 1 and 2 of [‘Working Together to Safeguard Children’](#).

The DSL must keep any such cases under constant review and consideration given to a referral to local authority children’s social care for assessment for statutory services if the child’s situation does not appear to be improving or is getting worse.

23. Statutory children’s social care assessments and services

At St Paul’s CE Primary Academy we will make a referral to children’s social care where a child is suffering, or is likely to suffer from harm

Where appropriate, a referral will also be made to the police.

Referrals will be made immediately and in accordance with the local referral arrangements, KCSIE and Chapter 3, section 3 of [‘Working Together to Safeguard Children’](#) 2026.

Children’s social care will consider whether children are experiencing harm in contexts outside the home. We will therefore provide all relevant information and evidence when making a referral to support a full assessment and a contextual approach to safeguarding.

At St Paul’s CE Primary Academy we will make a referral to Local Authority children’s social care where a child is suffering, or is likely to suffer, significant harm.

At St Paul’s CE Primary Academy we will fully support children’s social care assessments and share information as required. Where a child’s circumstances do not appear to be improving, we will follow local escalation procedures.

All referrals must be logged on the referral tab in MyConcern with all appropriate paperwork attached and filed accordingly with any outcomes/next steps clearly recorded.

24. Multi-agency working

At St Paul’s CE Primary Academy we recognise that we have a pivotal role to play in multi-agency safeguarding arrangements.

St Paul’s CE Primary Academy will work with the three safeguarding partners (the Local Authority; a clinical commissioning group for an area within the Local Authority; and the Chief Officer of Police for the police area in the Local Authority area) to make arrangements to work together to safeguard and promote the welfare of local children.

The DSL will contribute relevant information, professional observations and safeguarding context, while maintaining appropriate confidentiality and ensuring that information sharing is lawful, proportionate and in the best interests of the child.

The DSL will monitor the progress and outcomes of assessments where safeguarding concerns remain active and will ensure that the organisation continues to fulfil its safeguarding responsibilities throughout the assessment process.

The Local Governing Body will ensure that the school contributes to multi-agency working in line with statutory guidance [‘Working Together to Safeguard Children’](#) 2026.

25. Record keeping

All child protection records are kept and managed using MyConcern.

The DSL is responsible for ensuring that child protection records are kept up to date. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL (and DDSLs). Safeguarding records are shared with staff on a 'need to know' basis only.

Recording a concern

Staff must pass all safeguarding concerns to the DSL without delay. This should include speaking to the DSL as well as making a written record on MyConcern. Information should be kept confidential and stored securely. Concerns and referrals are recorded and kept in a separate record for each child using the MyConcern online recording, managing and reporting system. Records must build into a full and detailed chronology of a child and will include:

- a clear, comprehensive and as far as possible contemporaneously written account of the concern, (this may be used as evidence if the disclosure becomes a Police matter)
- records must use the child's words
- be shared as soon as possible after the incident/event - if there is an immediate concern the member of staff should consult with a DSL before completing the form as reporting urgent concerns takes priority.
- the record must be signed and dated by the member of staff.
- notes of any actions taken, how the concern was followed up, decisions reached and outcomes/resolutions.
- a body map will be completed if injuries have been observed.
- any supporting evidence of communications, including discussions, emails, letters and records of phone calls
- details of the decisions made together with a clear rationale for these decisions, including instances where referrals were and were not made to another agency such as children's social care, CAMHS or the Prevent programme
- responses to actions and ongoing discussions, meeting minutes and other communication
- other school records, such as first aid, medical treatment if the child is unwell, attendance and punctuality and behaviour.

They should ensure the records are only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in [Section 26](#) of this policy.

Staff should never promise a pupil that they will not pass on child protection concerns to the relevant staff and agencies. However, the child should be reassured that:

- their disclosure will be taken seriously, and it is not creating a problem
- their disclosure will only be shared with relevant staff
- staff will be sensitive to their feelings and concerns
- their wishes will be heard

- they will be kept informed of actions and support.

If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.

Managing case records

The DSL (and deputies) will ensure that records are kept fully up to date, with all actions, communications and relevant supporting documentation scanned and attached to the appropriate record.

The DSL and deputies will use the DCAT categorisation system to assign a category to each case recorded on MyConcern. This will enable patterns and trends to be identified and reviewed, supporting the planning of staff training and informing pupil RSHE learning.

Any referrals for Social Care assessments or Community-Based Early Help assessments will be made using the MyConcern referral tab. This will support the effective tracking of referrals, subsequent actions and follow-up.

Where multiple members of staff make referrals relating to a single concern about a child, the DSL (or deputies) will link the cases within MyConcern and ensure that all relevant actions and communications are recorded as a single, coherent case thread.

The DSL (and deputies) will ensure they clearly record their rationale for decision making.

26. Information sharing and confidentiality

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation. The [Data Protection Act 2018](#) and GDPR (data protection laws) do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote welfare and protect the safety of children. The school may legitimately share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk.

St Paul's CE Primary Academy recognises that it is our duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2026. The safety of the child is always paramount. Any concerns about sharing information must not be allowed to stand in the way of ensuring the welfare and safety of pupils.

If staff are in any doubt about sharing information, they should speak to the DSL (or deputies). [DfE Guidance on Information Sharing](#) (May 2024) provides further detail. The 7 'golden rules' for sharing information can support staff who have to make decisions about sharing information.

All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children. All staff must be aware that they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.

27. Child leaving or joining the school

Child leaving the school

If a pupil leaves St Paul's CE Primary Academy, the school will ensure:

- where the name of the next school is known, the DSL will alert the Headteacher and/or DSL ahead of the child's arrival about any safeguarding concerns
- their safeguarding file is sent securely to their receiving school once attendance has been confirmed.

St Paul's CE Primary Academy will ensure that when children leave, their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt. This information will be transferred separately from the main pupil file.

Receiving schools should ensure key staff such as the DSL and SENCO are aware as required. In addition to the child protection file, the DSL should also consider whether it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives. For children with lengthy and complex safeguarding case records, the DSL will provide a structured summary for the DSL at the receiving school, together with details of ongoing support and interventions.

If the next school is not known, the school procedures for children missing from education (CME) must be followed and in the case of a child of any concern, children's services alerted. Once the child is removed from roll, their safeguarding file is archived.

If the pupil is home-educated or has left the country, their safeguarding file is archived.

Child joining the school

When a child joins St Paul's CE Primary Academy we will ensure that all relevant safeguarding and child protection information is obtained promptly from the child's previous school or setting. This information will be transferred securely, stored in accordance with our record-keeping procedures, and shared with appropriate staff on a need-to-know basis to ensure that the child's safety and welfare are effectively supported from the point of admission.

28. Child-on-Child Abuse

All staff at St Paul's CE Primary Academy recognise that children can abuse their peers. This can happen both in and out of school and online. DCAT and St Paul's CE Primary Academy adopt a 'zero tolerance' approach to any form of child-on-child abuse.

All victims will be taken seriously, offered reassurance and appropriate support, regardless of when and/or where the abuse has taken place and assured that they are not creating a problem. Staff must be mindful that their response could impact on another child coming forward in future.

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and the perpetrator.

All staff should be aware that child-on-child abuse is preventable, and that early identification with timely and appropriate support and intervention can be key in preventing children from going on to commit abuse or violence.

All staff should understand the following aspects of child-on-child abuse and be clear about the school's approach:

- that even if there are no reports in their schools it does not mean it is not happening, it may be the case that it is just not being reported - it is important if staff have **any** concerns regarding child-on-child abuse they should speak to the DSL (or deputy)
- the importance of challenging inappropriate behaviour between peers, many of which are listed below, that are actually abusive in nature - downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved
 - that children may not find it easy to tell staff and a reminder that children can show signs in ways they hope adults will notice and react.

St Paul's CE Primary Academy recognises that child-on-child abuse (as set out in KCSIE 2026 paragraphs 35) is likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude (see definition in [section 5](#))
- 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, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

When responding to concerns relating to child-on-child sexual violence or harassment, St Paul's CE Primary Academy will follow the procedures set out in the anti-bullying/child-on-child abuse policy.

St Paul's CE Primary Academy recognises consensual and non-consensual sharing of nudes and semi-nude as a safeguarding issue. All concerns must be reported to and dealt with by the DSL (or deputy). The school's protocols for dealing with such concerns follows [DfE Searching Screening and Confiscation Advice](#) and [UKCIS Education Group Sharing nudes and semi-nudes advice for education settings](#) 2024 updated advice.

In serious cases, where it may be necessary to manage an immediate safeguarding risk or to protect pupils and staff, suspension may be considered. Any decision to implement separation suspension will be made in accordance with the school's behaviour and DCAT's suspension and exclusion policy and will take account of the individual circumstances of the case. This will not replace, *appropriate safeguarding actions*. Appropriate support will be provided to both the victim, and the perpetrator(s), may include the involvement of external agencies. Full and detailed records of the case, the actions and decisions will be maintained on MyConcern.

29. Female genital mutilation (FGM)

All staff are made aware of the issues around FGM, so-called 'honour'-based abuse and forced marriage, as well as the signs and symptoms. All staff have the MANDATORY and legal duty to report any concerns to the Police under Section 5B of the [Female Genital Mutilation Act 2003](#) (as inserted by [section 74 of the Serious Crime Act 2015](#)).

If any member of staff discovers that an act of FGM appears to have been carried out (or may be carried out) on a girl under the age of 18, the teacher/member of staff must report this to the police. Those failing to report such cases may face disciplinary sanctions.

Staff must also speak to the DSL (or deputy) with regard to any concerns about Female Genital Mutilation (FGM).

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufcdo.gov.uk.

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 eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. See [Appendix C](#) for further details of so-called 'honour'-based abuse and forced marriage.

30. Preventing radicalisation

Children can be susceptible to extremist ideology and radicalisation. St Paul's CE Primary Academy recognises its duty to prevent pupils from being drawn into terrorism or extremist activities and to protect them from the risks associated with radicalisation.

Risk assessment

The DSL will ensure that a Prevent risk assessment is undertaken and reviewed at least annually, in accordance with current DfE guidance [Completing a risk assessment to assess the risk of people becoming terrorists or supporting terrorism](#), and makes use of the appropriate [DfE template](#). The risk assessment will consider the risks within the school environment, including those associated with pupils' access to the internet and social media, and will identify appropriate mitigating actions, such as effective filtering and monitoring of internet use. This will be reviewed at least annually. See [Appendix C](#) for further details on preventing radicalisation.

Staff Training

All staff will receive appropriate training to enable them to recognise indicators that a pupil may be at risk of radicalisation or being drawn into extremist activity and to understand the procedures for reporting concerns. Prevent training will be formally updated in accordance with the school's safeguarding training programme, with regular updates provided through safeguarding briefings.

Pupil awareness and learning

As part of our work to prevent pupils from adopting extremist views and becoming radicalised, St Paul's CE Primary Academy will actively promote fundamental British values and provide a safe, inclusive and respectful environment through our school ethos, Christian values, PSHE curriculum and teaching relating to online safety.

Protocol for acting on a concern

If staff identify a concern they must follow school safeguarding reporting procedures, with any such concerns recorded on MyConcern, and where appropriate discussed with the DSL. These reports will be promptly considered and acted upon by the DSL (or a deputy DSL).

The DSL will consider each case, including any shared online material, extremist symbols, pupil behaviour or peer/family influence, along with any vulnerabilities or special educational needs the child may have. This will build a context of the case and provide context for considering and making a referral, if judged as required. All concerns will be fully documented including details of the concern, specific phrases, behaviours observed and any other relevant information. Parents/carers will be informed, unless doing so increases the safeguarding risk to the child. A record of the decision, and any conversation, will be made on the MyConcern case notes and included with the referral information.

Where concerns indicate that a pupil may be at risk of being drawn into terrorism, the DSL (or deputy DSL) will follow local safeguarding procedures and, where appropriate, make a Prevent referral in accordance with local arrangements, including seeking advice from the Prevent Team. The DSL may also consider referrals for Social Care assessment or Community Based early Help.

Prevent referrals are assessed in accordance with local procedures and, where appropriate, may be considered by a multi-agency Channel panel. The panel considers whether an individual is at risk of being drawn into terrorism and whether specialist support may be appropriate. Participation in Channel support is voluntary and requires the individual's consent, subject to the applicable legal and safeguarding framework.

31. Children at increased risk and/or are more vulnerable

Children absent from education

All staff should be aware that poor or irregular attendance, unexplainable and/or persistent absences or children going missing can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

All staff should monitor attendance carefully and raise concerns about poor or irregular attendance without delay. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Where there are safeguarding concerns staff must follow the reporting procedures set out in [section 21](#) of this policy.

Staff should be aware of the school's unauthorised absence and children missing from education procedures, which can be found in the school attendance policy.

The school will follow up with parents/guardians when pupils are not at school. This means the school will keep at least two up to date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

Children who are homeless

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Children in the courts and/or criminal justice system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. How children will be processed and supported will depend on their age - there are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

St Paul's CE Primary Academy will work to support children who are in the criminal justice system due to their own criminal behaviour, working with their families in line with the school's safeguarding systems and procedures. This includes attendance and wellbeing monitoring.

St Paul's CE Primary Academy is aware that making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. St Paul's CE Primary Academy will work to support the children and their families through the process and, where appropriate recommend the Ministry of Justice online [child arrangements information tool](#) which provides clear and concise information on the dispute resolution service.

Looked after children, previously looked after children and care leavers

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The DSL has the details of the child's social worker and the name of the Virtual School Head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

The school has appointed a designated teacher (see key contacts on *page 2/3*) Ian Smith. The designated teacher will work with Local Authorities to promote the educational achievement of any pupils who are looked after, previously looked after or care leavers.

St Paul's CE Primary Academy follows the guidance set out in [Promoting the education of looked-after and previously looked-after children](#) recognising the role of the Virtual School Heads. This includes children in kinship care arrangements, as set out in [Championing kinship care: national kinship care strategy](#).

St Paul's CE Primary Academy working with Virtual School Heads using their expertise and knowledge to raise aspirations and strengthen partnership working for these children. support these children. The DSL and leaders will use the guidance set out in [Championing kinship care: national kinship care strategy](#) to reduce the barrier to education for these children, in particular improving their attendance alongside addressing their safeguarding concerns.

Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities (SEND) can face additional safeguarding challenges. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the contents/behaviours or not understanding the consequences of doing so.

To address these additional challenges, St Paul's CE Primary Academy will consider extra pastoral support for children with SEN and disabilities. The DSL and SENCo will work together to effectively support these pupils.

Children who need a social worker

Children may need a social worker due to safeguarding and welfare needs. They may need this help due to neglect, abuse and/or complex family needs. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged. As a matter of routine, the DSL and other key staff at St Paul's CE Primary Academy will work with the child's social worker to ensure that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. The DSL and key staff will use this information to inform decisions about safeguarding, including the provision of pastoral and/or academic support.

Children requiring mental health support

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. Each Trust school should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

St Paul's CE Primary Academy has a documented mental health strategy in place, that is shared with all staff. The school's appointed named mental health lead, Maria Kiniari. The school will ensure the named mental health lead and other staff are appropriately trained for their roles in mental health issues and understand the school systems for raising concerns so help can be put in place.

St Paul's CE Primary Academy recognises that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, our staff have an important role to play. Specifically, they can support the fulfilment of the four key roles set out in KCSIE 2026 paragraph 226:

- promoting good mental wellbeing and preventing the onset of mental illness,
- observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,
- ensuring early targeted support is provided, and
- liaising with/referral to specialist services where needed.

Where support is needed, the designated safeguarding lead (or a deputy) will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

St Paul's CE Primary Academy will raise awareness with pupils, so they understand the importance of mental health through a Relationships Education curriculum and ensure each child knows how seek help, when needed. Details on the school's approach to mental health, together with sources of information and support, should be made available on the school website.

Children with health issues, including allergies

Certain medical or physical health conditions can face additional safeguarding challenges both online and offline. St Paul's CE Primary Academy has in place arrangements to care for children with specific health issues which are appropriate and well managed, with clear recognition of the need for vigilance in relation to safeguarding of those children.

St Paul's CE Primary Academy also recognises that the routine care and treatment of pupils who are unwell or injured during the school day provides opportunities to be vigilant in relation to safeguarding. The school has in place a documented policy and practice to ensure staff are able to recognise and report concerns. School leaders routinely analyse the school's records of the care and treatment of unwell or injured pupils to look for patterns and trends and takes appropriate actions.

St Paul's CE Primary Academy will work to ensure that children with allergies are protected and supported at all times. All staff will be made aware of the responsibilities regarding allergy management and emergency response. The school's allergy policy sets these responsibilities out in detail, which all employed staff, and those working for catering contractors, must strictly adhere to.

Young carers

St Paul's CE Primary Academy is alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing.

We will aim to identify any children who are taking on caring responsibilities for someone in their **household**, and as young carers provide them with timely support from the appropriate services including additional support from external partners, or local authority and health services.

Children who are lesbian, gay, bisexual

St Paul's CE Primary Academy recognises that a child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

At St Paul's CE Primary Academy, we will carefully consider the safeguarding and wellbeing needs of these children, including any specific vulnerabilities or increased risks, such as bullying. We will take appropriate preventative and protective measures to address identified risks and, where necessary, apply appropriate sanctions in line with our behaviour policy.

Children who are gender questioning

At St Paul's CE Primary Academy, we will ensure that the safeguarding and wellbeing of children who are questioning their gender are considered sensitively, respectfully and on an

individual basis and in line with the [DCAT Gender Questioning Pupils – DSL Guidance](#). This sets out the key principles of our approach and outlines the process we will follow step by step.

If a child or parent raises this issue we will:

- listen to the child's views and take account of their wishes and feelings, while ensuring that their safeguarding remains our primary consideration
- consider any specific vulnerabilities or risks the child may experience, including bullying, harassment, discrimination, isolation or mental health concerns, and take appropriate action to reduce these risks
- work in partnership with parents/carers and relevant professionals, where appropriate, and ensure that any support provided is consistent with the child's best interests, safeguarding duties and relevant statutory guidance
- ensure detailed records are kept of every discussion and decisions made on MyConcern.

If required we will seek advice and support from DCAT Head of Safeguarding.

32. Online safety

School approach to online safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. The breadth of issues classified within online safety is considerable, KCSI categories this into four areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: 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; for example: 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; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, pupils or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>) and to the DSL.

It is recognised by St Paul's CE Primary Academy that the use of technology presents challenges and risks to children and adults both inside and outside of school. As a school we will empower, protect and educate the community in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate. The school

sees technology and its use permeating all aspects of school. Our whole school approach to online safety is set out in detail in our online safety policy and threaded through other school policies, including those for the curriculum, subject teaching, behaviour, child-on-child abuse and RSE/PSHE.

The DSL has/have overall responsibility for online safeguarding within the school but will delegate responsibilities to nominated staff, including curriculum and technical staff and meet at least termly with them to provide a coordinated approach.

St Paul's CE Primary Academy takes a whole school approach to online safety. In addition to the overarching DCAT online safety policy, online safety is reflected in all relevant policies and across the curriculum.

St Paul's CE Primary Academy uses a wide range of technology. This includes computers, laptops, tablets, Chromebooks, the internet, our learning platform, intranet, email systems, messaging systems and other digital devices and systems. All school owned devices and systems will be used in accordance with our acceptable use policies and with school's appropriate safety and security measures in place. All devices owned by staff, pupils and visitors will also be used in accordance with our acceptable use policies and the appropriate safety and security measures.

The DSL will respond to online safety concerns in line with the child protection and other associated policies such as child-on-child abuse and behaviour. Internal sanctions and/or support will be implemented as appropriate and/or concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures, when necessary. Children are not allowed access to any phones during the day and these are stored in a secure area, permissions given by parents and access restricted until children are off site.

Online safety learning

St Paul's CE Primary Academy has developed a comprehensive whole school online safety curriculum to enable pupils of all ages to learn about and manage online risks effectively as part of the overall broad and balanced curriculum.

St Paul's CE Primary Academy will provide parents/carers with information on a regular basis to help them keep their children safe when they are online out of school. This information is passed on in newsletters or sent specifically to year groups when issues arise.

St Paul's CE Primary Academy will ensure that online safety training for all staff is integrated, aligned and considered as part of our overarching safeguarding approach. This will include, amongst other things, an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

St Paul's CE Primary Academy will annually review our online safety strategies and systems using the SWGfL 360° audit tool, as required by DCAT.

Filtering and monitoring

To safeguard our pupils and provide a safe learning environment for all, St Paul's CE Primary Academy will ensure it meets the DfE [standards for filtering and monitoring](#). As part of our work to meet these standards we will:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- consider the number of and age range of our children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks
- be informed in part, by the risk assessment required by the Prevent Duty
- ensure the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs and reviewed at least annually
- supervise pupils' use of the internet, according to their age and ability
- direct pupils to use age-appropriate online resources and tools
- review our filtering and monitoring provision, at least annually using the DfE's '[plan technology for your school service](#)' to self- assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them. The results of testing will be formally recorded and reported to governors and DCAT.

Mobile phones

At St Paul's CE Primary Academy mobile phones are not permitted to be used by pupils during the school day, in accordance with the Department for Education's guidance on mobile phones in schools. Any mobile phone brought onto the school site must be switched off and stored in accordance with the school's arrangements. The school will apply appropriate consequences where this expectation is not followed, in line with the behaviour policy.

Generative artificial intelligence

St Paul's CE Primary Academy will adhere to the [DCAT AI guidelines](#). This aims to support the responsible and innovative use of AI to enhance teaching, learning and operational efficiency. The guidelines recognise the importance of safeguarding in relation to the use of AI and the expectation for school staff to adhere to DCAT's preferred AI solution, which has been tested to ensure it provides a safe environment for staff and pupils.

St Paul's CE Primary Academy is aware that filtering and monitoring requirements apply to the use of generative AI in education. See section above which sets the school's approach for oversight, checking and reporting of filtering and monitoring arrangements.

Staff will be trained in the school approach to generative artificial intelligence and how to use it effectively and safely when carrying out their duties and responsibilities.

Use of images, videos and using CCTV

[Data protection in schools - Taking and using photos and videos, and CCTV in schools - Guidance - GOV.UK.](#)

St Paul's CE Primary Academy recognises the importance of protecting children and young people when using photographs, videos and CCTV. In accordance with data protection laws, KCSIE 2026 and EYFS 2026. St Paul's CE Primary Academy has appropriate policies in place that are shared and understood by all members of the community.

At St Paul's CE Primary Academy all images and recordings will be stored securely, accessed only by authorised staff and retained for no longer than necessary.

We will annually obtain the consent from parents and carers for the use of photographs and videos of pupils and will ensure they are used only for legitimate school purposes and in accordance with the permissions given.

Staff must not take, store or share photographs or videos of pupils using personal devices or unless authorised to do so.

Any concerns of inappropriate use, sharing or storage of images or videos must be reported to the DSL and/or data protection officer and managed in accordance with our safeguarding and DCAT data protection procedures.

CCTV is used where appropriate to support the safety and security of pupils, staff and visitors and to help prevent and investigate incidents. CCTV will be operated in accordance with the school's CCTV and data protection procedures, with appropriate signage and controls in place. Amend as needed for school.

Information security and access management

DCAT and St Paul's CE Primary Academy and take responsibility for ensuring the appropriate levels of security protection procedures are in place in order to safeguard the school's systems, staff and pupils. Cyber security arrangements are in place to ensure all information is held securely and in line with data protection laws. all about the school.

DCAT recognises the importance of keeping school held data and systems secure. The effectiveness of procedures are periodically reviewed to keep up with evolving cyber-crime technologies and ensure the security and integrity of school systems.

Should a data breach or cyber incident occur, we will alert the DCAT Cyber Security Incident Handling Team (CIHT) and follow the DCAT Cyber incident response plan.

St Paul's CE Primary Academy and DCAT will take appropriate action to meet the [cyber security](#) standards for schools and colleges to help improve resilience against cyber-attacks.

DCAT trustees and local governing board members also make use of guidance for considerations on cyber security from the [National Cyber Security Centre](#) – NCSC, which provides practical resources to help schools improve their cyber security.

33. Curriculum opportunities to teach safeguarding

At DCAT and St Paul's CE Primary Academy we recognise that as a school we play an essential role in helping children to understand and identify what is appropriate child and adult behaviour. We want pupils to recognise when they and others close to them are not safe and

how to seek advice and support when they are concerned. We view this as an essential part of preventative education.

In line with statutory requirements, St Paul's CE Primary Academy has in place numerous opportunities to teach pupils about safeguarding and how to keep themselves safe when they are out and about and when online. These are viewed as an essential part of the school's curriculum and opportunities include:

- Relationships education (primary) and relationships and sex education (secondary) (RSE) lessons
- online safety teaching
- personal, social and health education (PSHE) lessons
- spiritual, moral, cultural and social (SMSC) education
- the assembly and tutor programmes
- special events (*see note below on suitability vetting/checking*)
- visiting speakers (*see note below on suitability vetting/checking*).

Our curriculum provides age-appropriate opportunities for pupils to increase their self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making. Our approach aims to prepare pupils for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

To underpin this St Paul's CE Primary Academy adopts the following approaches:

- an RHE/RSHE policy sets out the school's approach to its content, delivery and assessment in line with the statutory guidance
- following the DfE guidelines for teaching online safety in schools and sets this out in relevant policies
- takes account of the school's context to ensure that pupils are age-appropriately taught about potential risks, self-assessment of risk and how to mitigate risks
- bases SMSC education on the strong faith foundations and ethos of DCAT
- recognises that one size does not fit all and takes a tailored approach for more vulnerable children, victims of abuse and some SEND children, so they will learn how to assess risk and adopt safe practices
- provides pupils with information to assist their transition into the next stage of their education.

Overall, our approach is designed to support and encourage pupils to talk to about their concerns and worries with confidence in the knowledge they will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

The school will consider the suitability of any external organisations who may provide information, resources & speakers to pupils. The arrangements for the individuals providing these services on the school's premises may include an assessment of their education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required.

34. Restrictive interventions, including the use of reasonable force

There may be circumstances where staff at St Paul's CE Primary Academy may need to use reasonable force or another restrictive intervention to safeguard children and young people, prevent harm or maintain safety. The term 'restrictive intervention' is defined by the DfE as a means to prevent, restrict or subdue movement of the body or part of the body, of a pupil. The term 'reasonable force' covers a broad range of actions used by staff that involve a degree of physical contact to control or restrain children. In such circumstances, reasonable means using no more force than is necessary and for the shortest time necessary. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

St Paul's CE Primary Academy seeks to minimise the use of restrictive interventions through positive relationships, effective behaviour support, appropriate adjustments and de-escalation strategies. Restrictive interventions must never be used as a form of punishment and staff should use the least restrictive option appropriate to the circumstances.

The school follows the Department for Education's [Restrictive interventions, including the use of reasonable force](#) guidance. Detailed procedures for the use, recording and reporting of restrictive interventions are set out in DCAT's Restrictive intervention protocol. This includes pupil welfare checks, incident reporting, parental notification, recording on MyConcern and follow up actions, including behaviour support plans for a pupil(s), review of staff training and where relevant safeguarding requirements. When managing incidents of restrictive interventions, including use of reasonable force, St Paul's CE Primary Academy will consider whether to liaise with the LADO and the DCAT Head of Safeguarding, this may partially be the case where it is thought that the physical intervention may lead to an allegation.

St Paul's CE Primary Academy will ensure that staff are familiar with the school's policy and the DCAT protocol and receive appropriate guidance and training in preventative and de-escalation strategies, as well as how to respond safely and proportionately where intervention is necessary. Where appropriate to their role and responsibilities, some staff may receive additional training in the safe and appropriate use of restrictive interventions.

Should a member of staff be in a position where they use 'reasonable force' they must inform the DSL and Headteacher and provide a written report.

35. Staff Wellbeing

St Paul's CE Primary Academy recognises that safeguarding is everyone's responsibility and that there is a duty of care to the professionals working in the school.

DCAT subscribes to a confidential Employee Assistance Programme (EAP) through Vivup. It offers access to a team of trained wellbeing and counselling practitioners to support all DCAT employees. They offer confidential, independent, and unbiased information and guidance by telephone, in writing, online and through face-to-face appointments for a wide

variety of issues and is available 24 hours a day, 7 days per week. Staff can contact the EAP by calling 0800 756 0861 and quoting Perkbox and Diocese of Chichester Academy Trust (DCAT).

36. Safer recruitment

St Paul's CE Primary Academy follows the DCAT Recruitment and selection policy and procedures. The DCAT policy adheres to the statutory guidance set out in KCSIE Part 3 for safer recruitment to prevent people who pose a risk of harm from working with children. The policy covers employed staff, supply staff, volunteers, contractors, trainee teachers, visitors to the school site, DCAT Trustees, DCAT Centre Team and members of the Local Governing Body.

The [School Staffing \(England\) Regulations 2009](#) require schools to ensure that at least one of the people conducting an interview has completed safer recruitment training. DCAT Trust Centre staff who are involved in recruitment have undertaken safer recruitment training and this is kept current, renewing every 3 years.

St Paul's CE Primary Academy ensures that all of the Senior Leadership Team have undertaken safer recruitment training and that this is kept current, renewing every 3 years. Governors who may be involved in recruitment will also be asked to complete the training.

Staff who manage the Single Central Record (SCR) must also complete the safer recruitment training.

The identity of any adult arriving to work in the school on any basis, will be checked on first arrival and where appropriate, their DBS check.

37. Volunteers

St Paul's CE Primary Academy will ensure that all volunteers who work regularly with children, including those who work with children for more than three days in any 30-day period (deemed as regulated activity), are subject to the appropriate enhanced DBS check, in accordance with statutory requirements of KCSIE 2026 (paragraphs 381-383) and the Crime and Policing Act 2026. The school will apply this to both existing and new volunteers from 1 September 2026, and in line with DCAT's Recruitment and selection policy and the DCAT Volunteers policy

For Volunteers who support the school but are not involved in regulated activity we will undertake a risk assessment and use our professional judgement and experience when deciding what checks to carry out. This risk assessment will be in line with KCSIE paragraph 386 and be formally recorded.

Adults who help on an occasional basis, such as on school trips and special events, will not be required to undertake DBS checks but will always be supervised by school staff.

38. Ongoing vigilance

DCAT and St Paul's CE Primary Academy leaders aim to create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children. DCAT and the school have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

All staff are made aware of the procedures to follow if they have a safeguarding concern about another staff member or safeguarding practices in the school. These are referred to in sections [39](#) and [40](#) of this policy and the [DCAT Employee Handbook](#).

There are times when DCAT and St Paul's CE Primary Academy will need to carry out new checks on existing staff. These are when:

- an individual working at the school or college moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children. In such circumstances, the relevant checks for that regulated activity must be carried out
- there has been a break in service of 12 weeks or more, or
- there are concerns about an individual's suitability to work with children.

If an existing member of staff moves to a new role or school within the Trust, DCAT and St Paul's CE Primary Academy must refer to the DCAT Recruitment and Selection policy and procedure for guidance on what appropriate checks must be completed.

39. Raising concerns about a member of staff or adult in the school

DCAT and St Paul's CE Primary Academy actively promotes an open and transparent culture in which **all** concerns about all adults (members of staff, governors, supply teachers, volunteers and contractors) working in or on behalf of the school are dealt with promptly and appropriately. This should enable early identification of inappropriate, problematic or concerning behaviour, minimise the risk of abuse, and ensure that adults working at St Paul's CE Primary Academy are clear about professional boundaries and act within these boundaries, and in accordance with the DCAT ethos and values set out at the start of this policy.

The [DCAT Managing Allegations against and low-level concerns about staff procedures](#) aligns to those set out in KCSIE part 4, for managing cases of allegations against employees. This includes both:

- Allegations that may meet the harm threshold.
- Allegations/concerns that do not meet the harm threshold – referred to for the purposes of this guidance as 'low-level concerns'.

These procedures apply to employed staff, trainee teachers, supply teachers, volunteers, contractors, visitors and adults working in organisations that provide activities for children which use the school premises.

All staff will be made aware of the expectations of the DCAT code of conduct and the procedures for raising allegations and concerns about a member of staff.

Allegations that may meet the harm threshold

This applies where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

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

Low level concerns

This applies to concerns which **do not** meet the harm threshold, referred to as 'low-level' concerns– no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct.

Reporting concerns

If staff have safeguarding concerns, or an allegation is made about another member of staff (including trainee teachers, volunteers, contractors, supply teachers and individuals involved with organisations that work with children on the school's premises) posing a risk of harm to children, this must be referred to the individual school's Headteacher and logged on the MyConcern Staff Safeguarding system

Where there are concerns/allegations about the Headteacher, this should be referred to the Trust Head of Safeguarding, via trustdsl@dcac.academy or the QR code on the Trust Safeguarding Posters in school.

Any member of staff can also contact the NSPCC whistleblowing advice line on 0800 028 0285 or DCAT centre team or DCAT Trustees all of whom are named on the DCAT website. See also contact details in on page 2/3 of this policy.

Duty to refer

If the outcome of an investigation is the evidence supports the allegation, the DCAT Head of Safeguarding will meet the legal requirement to make the necessary referral to the DBS. The DBS will consider whether to bar the person.

If the school, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the DCAT Head of Safeguarding **will** consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the [Education Act 2002](#). referral will be made as soon as possible when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned.

40. Raising concerns about safeguarding practices & whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team, Local Governing Body and DCAT Centre Team. Information on raising concerns can be found in the [DCAT Whistleblowing policy](#).

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance on whistleblowing can be found via: [Advice on Whistleblowing](#)
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 or email: help@nspcc.org.uk.

41. Remote education

St Paul's CE Primary Academy has a policy for remote education, which includes the arrangements for the safeguarding of children while they are learning from home, for example, pupils who are too unwell to attend school or undergoing hospital treatments.

The school will maintain regular contact with parents and carers. Any communications will be used to reinforce the importance of children being safe online. This includes:

- providing information to parents and carers to help them understand what systems the school has in place to filter and monitor online use
- informing parents and carers of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

If a pupil fails to log on when expected to, the DSL or other member of staff will make contact with parents/carers to check on the safety and wellbeing of the pupil, and may make a home visit.

42. Alternative provision

From time-to-time St Paul's CE Primary Academy places a pupil with an alternative provision provider. The school recognises that it continues to be responsible for the safeguarding of that pupil. No placement will be made without the school verifying, by a member of school staff visiting the provision, that the provider meets the needs of the pupils and that there are robust safeguarding procedures in place that fully meet the requirements of KCSIE.

St Paul's CE Primary Academy will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment - those checks that the school would otherwise perform in respect of its own staff. These checks are regularly reviewed, at least twice a year, to take account of staffing

changes and that systems of safer recruitment procedures are being sustained in line with the requirements of KCSIE part 3.

St Paul's CE Primary Academy has in place policy and protocols on the use of alternative provision, and how the safeguarding of these pupils will be ensured. This will be supported by completing the [DCAT Alternative Provision checklist](#).

St Paul's CE Primary Academy will ensure that any pupils placed in alternative provision follow the school's RE/RSE/RSHE and online safety curriculum so that no sessions are missed and the pupil can easily reintegrate back into these important lessons.

43. Elective home education

From September 2016 the [Education \(Pupil Registration\) \(England\) Regulations 2006](#) were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, St Paul's CE Primary Academy will work with the Local Authority and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.

St Paul's CE Primary Academy is aware that some children home education may not provide them with a suitable education and that they are less visible to the services that are there to keep them safe. St Paul's CE Primary Academy aim to discuss this with any parents expressing an intention to remove their child from the school.

44. Regulations and safeguarding requirements relating to school premises

Toilets

At St Paul's CE Primary Academy, we provide separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from inside intended for use by one pupil at a time). This is required by the School Premises (England) Regulations 2012 and Education (Independent School Standards) Regulations 2014.

At St Paul's CE Primary Academy we do not allow children into toilets designated of the opposite biological sex. This includes when we are responding to a request to support any degree of social transition for children questioning their gender. If a child questioning their gender does not want to use the toilet designated for their biological sex, we will consider if we can provide an alternate toilet facility which will not compromise the safety, comfort, privacy or dignity of the child or any other children.

Changing rooms and showers (secondary schools)

At St Paul's CE Primary Academy as informed by our safeguarding obligations, we provide changing accommodation and showers suitable for the pupils they are provided for, having regard to their ages, numbers, and sex and any special requirements they may have.

At St Paul's CE Primary Academy we do not allow a child, aged 11 years or older at the start of the school year, to undress in front of a child of the opposite biological sex. This is required by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, which require maintained schools, academies and independent schools to provide suitable changing accommodation and showers for pupils who are aged 11 years or over at the start of the school year.

When responding to a request to support any degree of social transition, a school must not allow a child access to changing rooms designated for the opposite sex

45. Use of school premises by outside organisations and individuals

St Paul's CE Primary Academy facilities/premises are hired or rented out to organisations or individuals (for example to community groups, sports associations, and service providers to run community activities, after school clubs, extra-curricular activities and tuition). St Paul's CE Primary Academy will seek assurance and verification that the organisations or individuals concerned have appropriate safeguarding and child protection policies and procedures in place in line with DfE guidance [Keeping children safe during community activities, after school clubs and tuition](#).

St Paul's CE Primary Academy will also ensure that there are arrangements in place to liaise with the school on any safeguarding concerns. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. St Paul's CE Primary Academy ensures that each hirer has appropriate arrangements in place to keep children safe in line with KCSIE 2026 paragraph 206-207. This forms part of the terms of hire agreement between the school and organisation.

If a concern is raised about an adult working for any of the organisations or an individual using the school's premises, the school will follow its procedures for dealing with allegations against staff, this includes informing the LADO.

Any services or activities provided by the Local Governing Body and under the direct supervision or management of their school, the school arrangements for child protection will apply.

46. Children staying with host families

St Paul's CE Primary Academy may make arrangements for pupils to be provided with care and accommodation by a host family to whom they are not related, for example as part of a foreign exchange visit or sports tour. In such circumstances, we will consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay in line with guidance set out in KCSIE Annex E.

47. Private fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. If such arrangements come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children, we will notify the appropriate Local Authority to allow officers to check the arrangement is suitable and safe for the child.

St Paul's CE Primary Academy will follow the guidance set out in [Championing kinship care: national kinship care strategy](#) working with the Virtual School heads to support any children in kinship care arrangements and to promote their achievement.

48. Site security and visitor arrangements

DCAT and St Paul's CE Primary Academy recognises that site security is an important part of safeguarding children, staff and other adults on the school site. We will take appropriate steps to ensure that the premises provide a safe and secure environment and that access to the site is appropriately managed.

Site security

At St Paul's CE Primary Academy we ensure there are appropriate controls over access and visitors, secure entrances and exits, supervision of pupils, and procedures for responding to unidentified or unauthorised individuals on the premises.

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. This includes following school procedures for challenging any individual who is not known or identifiable.

In the event of a serious incident, St Paul's CE Primary Academy has emergency procedures in place to support the safety and welfare of pupils, staff and visitors. Staff and pupils will be made aware of the relevant procedures and the actions they should take in the event of an emergency.

DCAT and St Paul's CE Primary Academy will regularly review site security arrangements and address identified risks through appropriate risk assessments and control measures. This includes consideration of safeguarding during arrival and collection times, school events, contractors working on site and any circumstances where normal site security arrangements are altered.

Visitor arrangements

On arrival visitors, volunteers and governors are expected to go to St Paul's CE Primary Academy reception area and report to the duty staff. Visitors and volunteers will be expected to sign in using the online visitor log.. Appropriate checks, including photo ID, will then be

undertaken in respect of visitors and volunteers coming into St Paul's CE Primary Academy to verify their identity, DBS status (if appropriate) and purpose of visit.

The Headteacher/principal will use their professional judgement to decide on access arrangements and if a visitor should be supervised and/or escorted. All visitors, volunteers and governors are required to wear/display a visitor's badge whilst on site.

All visitors and volunteers will be provided with information in the form of information on i-Pad outlining the school's safeguarding and child protection arrangements. All visitors and volunteers are expected to follow these school arrangements and sign out via the office

Once the appropriate suitability checks have been undertaken, members of the Local Governing Body will be issued with school/academy badges to show and wear when they visit the school. DCAT Centre team members and Trustees, all of whom will have been checked for their suitability to work in schools, will be required to show and wear their DCAT identity badges when they visit St Paul's CE Primary Academy

The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

49. Complaints

The DCAT Complaints policy and procedures is published on the DCAT and school website. Any member of staff, pupil, parents/carers and visitors who wish to report concerns is required to follow this policy. All reported concerns will be taken seriously and considered following the published procedures.

Anything that constitutes an allegation against a member of staff, supply staff, contractors, governor, volunteer or any other adult will be dealt with under the specific procedures for Managing allegations against staff – these are referred to in [section 39](#) of this policy and set out in detail in the DCAT HR and Employee Handbooks.

50. Safeguarding monitoring arrangements

St Paul's CE Primary Academy takes a proactive approach to monitoring safeguarding arrangements in place to ensure they are effective. The DSL and Headteacher will provide regular reporting on child protection and safeguarding to the Local Governing Body. These reports will not include details of individual children's situations or identifying features of families as part of their oversight responsibility.

The Local Governing Body of St Paul's CE Primary Academy has adopted varied approaches to the monitoring of the school's safeguarding arrangements, these include:

- regular meetings with the DSL and other key staff
- visits to school
- ascertaining the views of staff, pupils and parents through formal and informal discussions and/or surveys

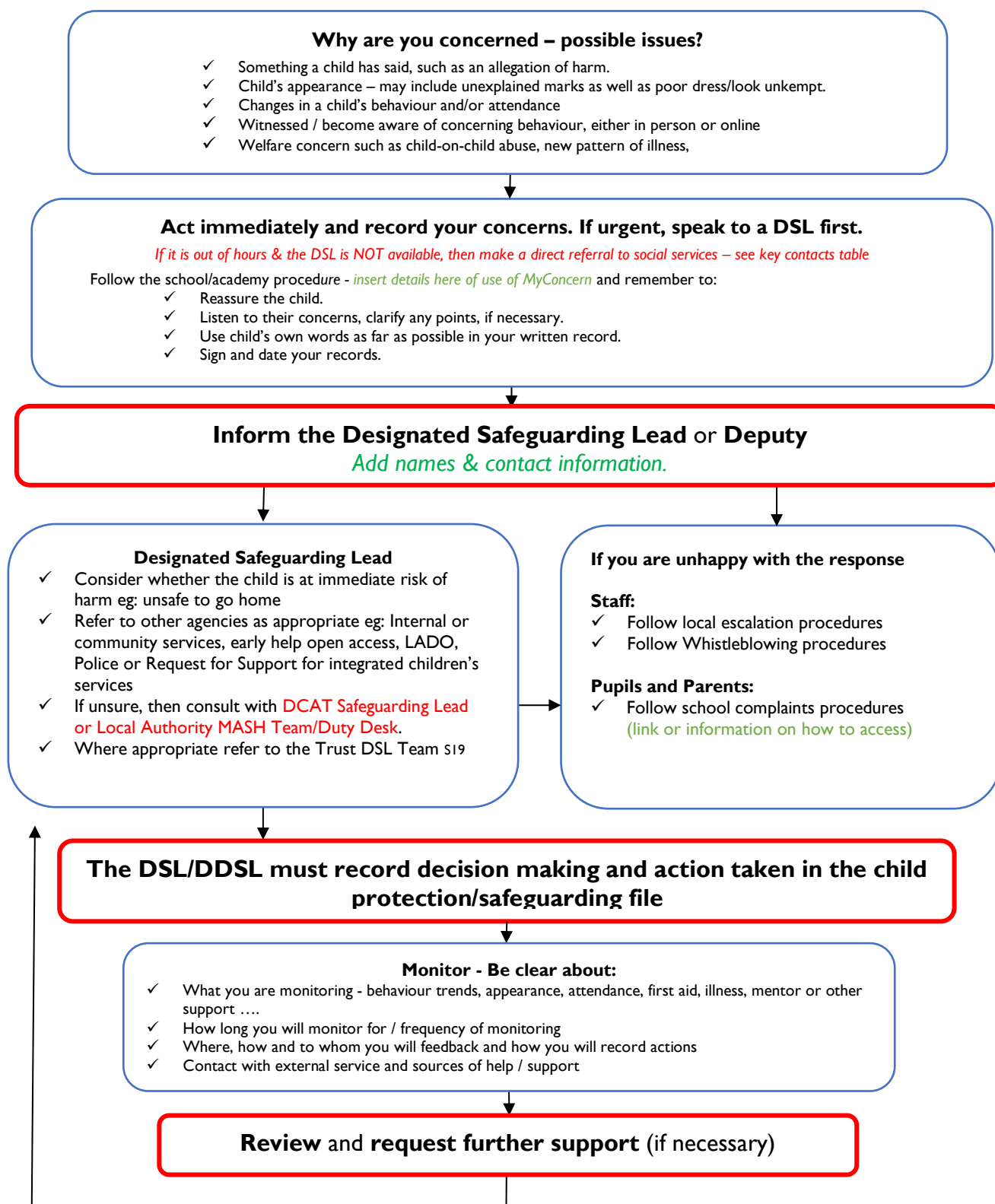
- use of an audit tool
- asking all governors to ask a safeguarding question during meetings with leaders/staff on other aspects of school life,
- Confirmation from the Trust that checks have been completed on the school Single Central Register 3 times per year
- review of school data
- peer review
- use of an external consultant and audit.

Representatives of DCAT will also make regular visits and review school documentation to ensure that safeguarding arrangements are effective.

51. Review period

This policy will be reviewed at least annually. It will be revised earlier following any national or local policy updates, any local child protection concerns and/or any changes to our procedures. All staff will be informed of any changes made.

Appendix A – What to do if a member of staff has a safeguarding concern about a child



**At all stages, the child's circumstances will be kept under review.
 The DSL/DDSL/Staff will request further support, if required.
 The child's safety is paramount.**

Appendix B - Categories of Abuse

All staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. (KCSIE 2026 Paragraph 24)

Physical abuse	Signs that MAY INDICATE physical abuse
A form of abuse which 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.	• Bruises and abrasions around the face • Damage or injury around the mouth • Bi-lateral injuries such as two bruised eyes • Bruising to soft area of the face such as the cheeks • Fingertip bruising to the front or back of torso • Bite marks • Burns or scalds (unusual patterns and spread of injuries) • Deep contact burns such as cigarette burns • Injuries suggesting beatings (strap marks, welts) • Covering arms and legs even when hot • Aggressive behaviour or severe temper outbursts. • Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.
Emotional abuse	Signs that MAY INDICATE emotional abuse
The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.	• Over reaction to mistakes • Lack of self-confidence/esteem • Sudden speech disorders • Self-harming • Eating Disorders • Extremes of passivity and/or aggression • Compulsive stealing • Drug, alcohol, solvent abuse • Fear of parents being contacted • Unwillingness or inability to play • Excessive need for approval, attention and affection

Sexual abuse	Signs that MAY INDICATE Sexual Abuse
Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.	• Sudden changes in behaviour and performance • Displays of affection which are sexual and age inappropriate • Self-harm, self-mutilation or attempts at suicide • Alluding to secrets which they cannot reveal • Tendency to cling or need constant reassurance • Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby • Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger • Unexplained gifts or money • Depression and withdrawal • Fear of undressing for PE • Sexually transmitted disease • Fire setting
Neglect:	Signs that MAY INDICATE neglect
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.	• Constant hunger • Poor personal hygiene • Constant tiredness • Inadequate clothing • Frequent lateness or non-attendance • Untreated medical problems • Poor relationship with peers • Compulsive stealing and scavenging • Rocking, hair twisting and thumb sucking • Running away • Loss of weight or being constantly underweight • Low self esteem

Appendix C - Specific safeguarding issues (KCSIE Annex A)

KCSIE 2026 Annex A: Further information

Annex A contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this Annex.

As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately. **They should follow sections 2 and 12 of this policy and speak to the designated safeguarding lead (or a deputy).**

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate, the police) is made immediately.

Specific forms of abuse and safeguarding issues

- Child abduction and community safety incidents
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County lines
- Children and the court system
- Children missing from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Modern Slavery and the National Referral Mechanism
- Preventing radicalisation
- The Prevent duty
- Channel
- Serious Violence
- Honour based abuse (including Female Genital Mutilation and Forced Marriage)
- FGM
- FGM mandatory reporting duty for teachers
- Forced marriage
- Additional advice and support

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep

themselves safe. All schools are required to teach about personal safety through the RSHE curriculum. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting victims of exploitation and modern slavery. Whatever form it takes, exploitation and modern slavery is child abuse and relevant child protection procedures must be followed if modern slavery or trafficking is suspected, as per the [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK](#)

Some children will also have access to an Independent Child Trafficking Guardian. Independent child trafficking guardians provide advocacy for children and help to promote and support their recovery.

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, having a physical or learning disability, or being neurodivergent, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions which could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal and sexual exploitation,
- associate with other children involved in exploitation,
- suffer from changes in emotional well-being,
- misuse alcohol and other drugs,
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in the DfE guidance: [Child sexual exploitation: guide for practitioners](#).

County lines

As county lines is a form of criminal exploitation, a First Responder who identifies any potential victim of county lines exploitation should complete the relevant child protection and modern slavery referrals as detailed in the Modern Slavery statutory guidance.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home,
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime),
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs,
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection,
- are found in accommodation that they have no connection with, often called a ‘trap house’ or ‘cuckooing’ or hotel room where there is drug activity,
- owe a ‘debt bond’ to their exploiters, and
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office [Child exploitation disruption toolkit \(accessible\)](#) - GOV.UK and The Children's Society [County Lines Toolkit For Professionals](#) | [The Children's Society](#).

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an [online child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour or faith-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

Children with family members in prison

Approximately 193,000 children in England and Wales have a parent in prison each year. They are at risk of poor outcomes as a result of poverty, stigma, isolation and poor mental health. The [Prisoners' Families Helpline](#) offers free, confidential support and advice for families in England and Wales who are in contact with the criminal justice system.

School and college staff should be aware that children who have experienced parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. Staff should understand the need for tailored, trauma-informed and sensitive support that can help mitigate potential harm and help encourage stability.

Cybercrime

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

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

Young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications. The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure.

Cyber-dependent crimes include:

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

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

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide preventative police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

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

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

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent or care giver abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

Domestic abuse is one of the most prevalent forms of abuse, with Women's Aid estimating that 160,000 children are currently living in households where domestic abuse is taking place.

This is likely to be an underestimate, however, with much abuse remaining hidden and not coming to the attention of services. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures as set out in paragraphs 55-61 should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass

Operation Encompass is an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales. In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently. Operation Encompass report over 2,000 notifications are made to settings every day.

Educational settings are often the only consistent support available to some children, especially for those who live in isolated or rural communities. The aim of the duty is to support education settings to provide timely, informed support to children affected by domestic abuse, to ensure the school has up to date information about the child's circumstances and enable immediate support to be put in place according to the child's needs. This places no new responsibilities on education settings.

Operation Encompass does not replace statutory safeguarding procedures or referrals and applies solely to domestic abuse incidents. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare.

Forces and educational settings should have an open communication process to determine where a safeguarding referral should be made in accordance with local thresholds. If an officer makes a referral alongside issuing an Operation Encompass notification, they should tell the child's education setting.

The duty applies to all children in education from reception (typically aged 4/5) up to the age of 17, and who are enrolled in registered primary and secondary schools, including independent schools, private schools, alternative provision settings (e.g., Pupil Referral Units), as well as further education colleges or 16 to 19 academies in England or Wales. Police forces must notify the local authority if the child is electively home educated or missing from education. Forces may also make notifications to other settings, for example early years settings or further education provision for young people with SEND, although these are not covered under the duty.

More information about the scheme can be found in the statutory guidance for police: [Duty on police forces in England and Wales to notify education establishments of domestic abuse incidents: Operation Encompass](#). This guidance intends to recognise and respond to children as victims of domestic abuse in their own right. It does not replace existing statutory guidance, including [Keeping children safe in education](#) and [Working Together to Safeguard Children in England](#).

Additional resources for education settings, including [Online National Key Adult Training: Operation Encompass](#) can be found on the charity's website Home: [Operation Encompass](#).

Operation Encompass notifications

Operation Encompass involves the sharing of personal and sensitive information about children and families. It is vital that all participants comply with the data protection laws.

Police forces and educational settings are responsible for deciding how and where information about incidents and notifications are made. They must ensure it remains confidential, is held securely, and adheres to the requirements of the data protection laws.

The designated safeguarding lead is responsible for leading on all safeguarding and child protection matters within an educational setting. They are likely to be the Key Adult for Operation Encompass notifications and are responsible for making safeguarding referrals to appropriate agencies, maintaining up-to-date safeguarding policies and training, overseeing record-keeping, and liaising with families where appropriate. DSLs may wish to use a central safeguarding inbox to ensure they have oversight over all Operation Encompass notifications.

The notification should include:

- the name, date of birth and protected characteristics (e.g., disability, race, religion etc.) of any child from that education setting who is related to any adult involved in the incident, whether the adult is the alleged perpetrator or non-abusive relative
- the relationship of the child to the victim and to the perpetrator,
- the police reference number,
- the location, time and date of the incident,
- if the child was present, and if so, where they were (notifications should be shared even if the child was not present at the particular incident),
- the voice of the child, such as what they are saying and how they are behaving, and
- the context and the circumstances of the incident, including whether an arrest was made, whether the incident was attended in person or via Rapid Video Response, and where possible, information on previous domestic abuse incidents.

The notification should not include:

- information or reference to sexual offences disclosed at the domestic abuse incident. This must not be disclosed in the notification. Under the Sexual Offences (Amendment) Act 1992, anonymity for victims of sexual offences must be preserved.

The Operation Encompass charity provides an advice and helpline service for all staff members from education settings who may be concerned about children who have experienced domestic abuse. The helpline is available from 8:00 to 13:00, Monday to Friday on 0204 513 9990 (charged at local rate).

Footnote 152 Section 20 of the Victim and Prisoners Act 2024 introduced a new provision into Part 3 of the Domestic Abuse Act 2021 under Section 49A. [Victims and Prisoners Act 2024]

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safe Young Lives: Young people and domestic abuse | Safelives](#)
- [Domestic abuse: specialist sources of support](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- [Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)
- The Home Office publish guidance on [Controlling or coercive behaviour](#) which provides clear information on what constitutes controlling or coercive behaviour and how to identify the offence.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children, and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Ministry

of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation: [here](#).

Temporary accommodation notification duty

The Children's Wellbeing and Schools Act places a new duty on local housing authorities in England to notify educational institutions, health visiting services and general medical practices, when a child is placed in temporary accommodation. This notification should be made when consent has been given from the parent, those with parental responsibility or care of the child, or the child themselves in cases of 16–17-year-olds living independently from their parents.

The notification will enable school and college staff to safeguard and promote the welfare of these children at the earliest opportunity and support them to improve their outcomes. Whilst any discussion with the local housing authority should be progressed as appropriate, this notification does not, and should not, replace existing safeguarding and welfare duties nor a referral into local authority children's social care where a child has been harmed or is at risk of harm.

Specific statutory guidance for local authorities on the temporary accommodation duty will be provided in due course.

Modern slavery and the National Referral Mechanism

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs. Further information and training for professionals on exploitation and modern slavery is available [here](#) - [Modern slavery training: resource page - GOV.UK](#)

The National Referral Mechanism is the system used within the UK to support potential victims of exploitation and modern slavery. Further information on the signs that someone may be a victim of exploitation and modern slavery, the support available to victims and how to refer them to the NRM is available in statutory guidance [Modern slavery: how to identify and support victims - GOV.UK](#).

Children who are referred into the NRM in England and Wales may also have access to an Independent Child Trafficking Guardian (ICTG). ICTGs provide advocacy for children and help to promote and support their recovery.

Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

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

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Footnote 153 As defined in the Government's Prevent Duty Guidance for England and Wales.

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

Footnote 154 As defined in the Terrorism Act 2000 (TACT 2000)

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are [factors that may indicate concern](#).

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) [Making a Prevent referral](#).

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from becoming terrorists or supporting terrorism”. This duty is known as the Prevent duty.

Footnote 155: Counter-Terrorism and Security Act 2015 (legislation.gov.uk)

Footnote 156 “Terrorism” for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in education settings should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments.

The school or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. Whilst the referral is being assessed, should any further or new information come to light, this should also be passed to police. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#) and [Channel training from the Home Office](#).

Additional support

The Department has published further advice for those working in education settings with safeguarding responsibilities on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- [Prevent awareness e-learning](#) offers an introduction to the Prevent duty.
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are robust, informed and with good intention.
- [Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#) is a government website designed to support school and college teachers and leaders to help them safeguard their pupils from radicalisation and extremism. The platform provides free information and resources to help staff identify and address the risks, as well as build resilience to radicalisation. These resources are regularly updated to ensure they remain relevant and practical. Resources have been developed working closely with education professionals and civil society groups to identify and produce high-quality materials that assist teachers in building pupils' critical thinking skills and resilience to extremist ideologies.

For advice specific to further education, Educate Against Hate hosts a suite of [teaching packs](#) and accompanying guidance to meet the specific needs of pupils and practitioners in further education and training settings. The Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings to comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals. The Education and Training Foundation (ETF) provides [online training modules](#) for practitioners, leaders and managers, to support staff and governors/Board members in outlining their roles and responsibilities under the duty.

London Grid for Learning has also produced useful resources on [Prevent \(Online Safety Resource Centre - London Grid for Learning \(lgfl.net\)\)](#).

Serious violence

There are a number of indicators, which may signal children are at risk from, or are involved in committing serious violence. These may include:

- increased absence from school or college,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in educational performance,
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and

- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male,
- having been suspended, spent time in Alternative Provision or permanently excluded from school,
- having experienced child maltreatment,
- having been involved in offending, such as theft or robbery,
- having used drugs or alcohol in early adolescence, and
- having previously been a victim or previously perpetrated violence

A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy](#).

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places. These times can be particularly risky for young people involved in serious violence. It is important that schools and colleges try to understand where these places are, with a view to working with partners to promote safety for children. Listening to children and consulting with staff can help establish when and where they feel unsafe. Working with wider partners can also help build understanding of the local context beyond the school or college and help co-ordinate a collective safeguarding response around the school day.

Advice for schools and colleges is provided in the Home Office's [Criminal exploitation of children and vulnerable adults: county lines](#) guidance. The Youth Endowment Fund (YEF) (the "what works" centre for preventing violence) has produced [practical guidance for schools and colleges](#) and an accompanying [self-assessment tool](#) to help introduce evidenced practice for preventing children becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found [here](#). As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined-up approach to young people across the risk spectrum.

[Police, Crime, Sentencing and Courts Act 2022](#) introduced a new [Serious Violence Duty \(Statutory Guidance\)](#) on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities are under a separate duty to co-operate with core duty holders when asked, and there is a requirement for the partnership to consult with all such institutions in their area.

The Duty **does not** replace or duplicate existing safeguarding duties.

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

Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see below).

Footnote 157 Under Section 5B(1)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college's designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Footnote 158 Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#) particularly section 13.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage -GOV.UK \(www.gov.uk\)](#) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

In addition, 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 eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages'

Additional advice and support

There is a wealth of information available to support schools and colleges. KCSIE pages 172 to 180 provide a long list of sites that provide useful starting points.

Appendix D – Guidance for schools on child-on-child abuse policy contents

Aligns to updated/revised Part 5 KCSIE 2026. This appendix is for advice and should be deleted prior to publication of the safeguarding policy.

This appendix provides a summary of KCSIE references and an overview of the content of a child-on-child abuse policy.

A separate policy should be in place to cover all forms of child-on-child abuse, including sexual violence/sexual harassment, and serious violence. The policy should be clearly linked and inline with other school policies, such as online safety and behaviour.

Part 5 of KCSIE has been extensively rewritten for 2026. Schools should read this carefully and ensure their policies have been revised in line with the 2026 guidance while reflecting their context and provision and also review and document how they actively work to prevent and respond to all forms of bullying/child-on-child abuse. The rewrite also highlights the progressive continuum from harmful sexual behaviour through to sexual violence.

Also, ensure all staff are clear on the school's policy, reporting procedures and the important role they have to play in preventing child-on-child abuse and responding to it.

KCSIE references across guidance		
Para/Page reference	Part	Notes
30-35	1	Information to staff on child-on-child abuse (including harassment and violence)
46	1	serious violence),
120	2	School policies – behaviour policy which covers measures prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
156-161	2	Opportunities to teach safeguarding with cnderable and reference to bullying, including online harms such as sharing nudes and semi-nudes
190	2	School policy on child-on-child abuse (including harassment and violence (note an updated list)
526	5	Intro to Part 5 – reminder to staff ‘it could happen here’
Page 161	Annex A	Section on domestic abuse, with reminder that can be child-on-child
Page 179	Annex A	Farrer&Co link to support addressing-child-on-child-abuse.pdf This resource provides practical guidance for schools and colleges on how to prevent, identify early and respond appropriately to child-on-child abuse.

Summary of changes:

Paragraph 527:

Updated to clarify that all incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether they are consensual or non-consensual.

Paragraph 531:

Additional paragraph added on HSB (previously part of para 525)

Paragraph 532:

Added link to NSPCC resource providing advice on stages of typical sexual development and behaviour for different age groups.

Paragraph 533:

Added link to resource for advice on responding to children who display sexualized behaviour.

Paragraph 540:

Added further information on consent

Paragraph 575-581:

Updated header and expanded description of universal services and community-based early help.

Paragraphs 582-592:

Added new section on “*Referrals to Family Help*”.

Types of child-on-child abuse listed in KCSIE (para 35):•

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’),
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),
- serious physical assault and harm, or the threat of harm with a weapon,
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence),
- sexual harassment⁹ such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse,
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- consensual and non-consensual making or sharing of nudes and semi-nudes¹⁰,
- 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, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

School should also have in place policy for searching, screening and confiscation and clear protocol of what to do if staff find out there may be inappropriate images on a child's phone. This includes reporting to Police. *Not covered in KCSIE but in [DfE guidance](#).*

Revised list in **Para 19** states the **policy should include:**

- procedures to minimise the risk of child-on-child abuse,
- the systems in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously,
- how allegations of child-on-child abuse will be recorded, investigated, and dealt with,
- clear processes as to how victims, perpetrators and any other children affected by child-on-child abuse will be supported,
- a recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported,
- a statement which makes clear there should be a zero-tolerance approach to abuse, and it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children,
- recognition that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys’ perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously, and
- the different forms of child-on-child abuse can take, such as:
 - bullying (including cyberbullying, prejudice-based and discriminatory bullying),
 - abuse in intimate personal relationships between children (also known as teenage relationship abuse),
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm,
 - physical assault and harm, or the threat of harm with a weapon,
 - harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry. Part five of this guidance sets out how schools and colleges should respond to reports of this nature,
 - consensual and non-consensual making or sharing of nudes and semi-nudes, policy should include the school or college’s approach to it. The department provides Searching Screening and Confiscation Advice for schools. The UKCIS Education Group has published Sharing nudes and semi-nudes: advice for education settings working with children and young people which outlines how to respond to an incident,
 - consensual and non-consensual sharing of nudes and semi-nudes, including those generated using AI. The department provides [Searching Screening and Confiscation Advice](#) and The UKCIS Education Group has published [UKCIS Education Group Sharing nudes and semi-nudes advice for education settings](#) advice for education settings working with children and young people which outlines how to respond to an incident.

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- upskirting (which is a criminal offence⁴⁴), 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, and
- initiation/hazing type violence and rituals.

Advice for how a child-on-child abuse policy could be structured and set out:

Policy could/should be divided into four sections:

- 1) Introduction, policy aims and the different forms child-on-child abuse can take – see list above that should be covered (Paras 33 and 156-157)

and make clear that

The school will respond appropriately to **all** reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. **Part 5 (Para 451-453 and 487-488)**

- 2) Dealing with child-on-child abuse (bullying) that is not classed as sexual violence and sexual harassment (Para 30-33 and 156-157)
- 3) Dealing with incidents of child-on-child sexual violence and sexual harassment **Part 5**
- 4) The school's approach to preventing child-on-child abuse and teaching about safeguarding – the preventing child-on-child abuse **Para 156-159 (Part 2) and 463 (Part 5)**

Contents of the four sections is set out below:

Section One – aims of policy

- reminder to staff that 'it can happen here' **Para 55, 536**
- reminder it can happen inside and outside school and online **Para 30, 536 and 539**
- List of the types of bullying **Para 33 and 191**
- importance of acknowledging and understanding scale of harassment and abuse, reference to term harmful sexual behaviours and the impact on a child **Para 527-530**
- definitions of HSB, sexual violence **Paras 455** and sexual harassment **Para 531-540**
- awareness that children may not find it easy to tell staff and a reminder that children can show signs in ways they hope adults will notice and react **Para 16-17 and 552-555**
- zero tolerance approach – never acceptable or tolerated **Para 527**
- girls being more likely to be victim of sexual violence or sexual harassment **Para 529**, also recognition of increased risk for SEND pupils **Para 156, 158 & 247**
- details of how all incidents of bullying will be recorded, analysed and reported to governors and senior leaders. This includes looking for patterns and trends and links to safeguarding.

Section Two – Non-sexual child-on-child abuse

- The school's current procedures for dealing with bullying that is non-sexualised. In the main this covers:
 - bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - abuse in intimate personal relationships between peers;
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;

-

Section Three – child-on-child sexual violence and sexual harassment

- the designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and should be involved in the decision making on the initial response by the school. Important considerations will include: (Para 3 and 568)
 - the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children
 - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
 - the ages of the children involved
 - the developmental stages of the children involved
 - any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
 - if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
 - that sexual violence and sexual harassment can take place within intimate
 - personal relationships between children
 - importance of understanding intra familial harms and any necessary support for siblings following incidents
 - are there ongoing risks to the victim, other children, adult pupils or school or college staff, and
 - other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Responding to reports and concerns of child-on-child sexual violence and sexual harassment
Part 5. Details should cover:

- reminder it can happen inside and outside school and online **Para 536, 539**
- importance of acknowledging and understanding scale of harassment and abuse **Para 527**

- awareness that children may not find it easy to tell staff and a reminder that children can show signs in ways they hope adults will notice and react [Para 16-17 and 552-555](#)
- zero tolerance approach – never acceptable or tolerated [Para 527](#)
- definitions of sexual harassment, sexual violence and harmful sexual behaviours (HSB) [Para 531-540](#)
- school approach to preventing abuse [Para 541](#)
- **Response to a report of sexual violence and sexual harassment steps school will take** in response to a report [Para 552-553 and 555](#)
- **reassurance** for victims that they are taken seriously, regardless of time taken to come forward and that abuse can have occurred online or outside school, not creating a problem, reassured not to feel ashamed or that they will be criminalised [Para 554](#)
- **record keeping** - recording all discussions and decisions in writing [Para 555 \(listed in bulleted approach\)](#)
- the **management of reports**, two staff present, if online – not viewing images, not promising confidentiality, trauma/impact of reporting, listening, additional barriers of reporting for some pupils, fact recording only, informing DSL as soon as possible [Para 468](#)
- **confidentiality** management [Para 556-561](#)
- **anonymity** while the case is progressing [Para 562-564](#)
- **risk assessment** process, including involving social care [Para 565-567](#)
- **follow up actions** - what to consider, such as age of child, seriousness of incident, power imbalance. [Para 568-569](#)
- **four management options** 1) manage internally, 2) early help, 3) referral to children's social care and 4) reporting to Police and managing the criminal process [paras 570-615](#)
- **unsubstantiated, unfounded, false and malicious reports** - review of records for patterns of concerning and problematic or inappropriate behaviour and if found false, consideration that the child and/or person who made allegation is in need of support and any disciplinary action [Para 616-618](#)
- **Safeguarding & supporting the victim** [Para 619-628](#)
- **safeguarding & supporting the alleged perpetrator(s)** and children/YP who have displayed harmful sexual behaviour (also siblings and peers) [Para 629-631](#)
- **sanctions** and the alleged perpetrators [Para 632-633](#)
- **working with parents and carers** [Para 636-641](#)
- **safeguarding other children** Consideration of **ongoing education** for victim and perpetrator and if they may be **sharing same classroom** [Para 642-647](#)

Section Four – school approach to the prevention of child-on-child abuse (anti-bullying strategy)

- school ethos/ambition for approach to preventing child-on-child abuse
- details of the school's work to prevent child-on-child abuse

- overview of opportunities for teaching safeguarding as set out in KCSIE para 156-161
- how prevention of child-on-child abuse (including online abuse) is promoted – round school, school website, newsletters and so on
- information about the curriculum teaching, assemblies, special events etc
- responding to events/issues with staff and pupils as well as policy/procedure review from lessons learned
- analysis of records and incidents for patterns and trends
- quality assurance/impact of the school's work to prevent child-on-child abuse
- monitoring and review of school's strategy to prevent child-on-child abuse