NORTH STAR
COMMUNITY TRUST

Enfield
Heights
ACADEMY

Safeguarding,

Child Protection

and associated procedures

Safeguarding, child protection and associated procedures

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The term 'staff' refers to all staff on site including ancillary, agency and supply staff, students on placement, contractors who work with children, Governors, Trustees and volunteers working with children.

The term 'child' / 'children' includes everyone under the age of 18 however any pupil older than 18 but still on roll at a school would be included in scope of our policies

Designated and deputy designated safeguarding leads (and support)

Enfield Heights ACADEMY **020 8805 9811** heights@northstartrust.org.uk	**DSL** **Stella Gannon** Head teacher **DDSL** **Ashan Venn** Deputy Head teacher **DDSL** **Annie Moore** SENDCo Supported by the Trust Central Safeguarding Team
Heron Hall ACADEMY **020 8443 9631** heron@northstartrust.org.uk	**DSL** **Elaine Anglin** Assistant head teacher **DDSL** **David Maytham** Head teacher **DDSL** **Carla Courtney** SENDCo **DDSL** **Kelly Hon** Deputy head teacher Supported by additional trained members of SLT, Heads of Year and the Trust Central Safeguarding Team
Kingfisher Hall ACADEMY **020 8344 9890** kingfisher@northstartrust.org.uk	**DSL** **Gemma Vincent** Head teacher **DDSL** **Havva Ayer** Deputy head teacher **DDSL** **Nicola Barlow** Associate Assistant head teacher **DDSL** **Andrea Sofroniou** SENDCo Supported by the Trust Central Safeguarding Team
Woodpecker Hall ACADEMY **020 8804 4126** woodpecker@northstartrust.org.uk	**DSL** **Nicky Ross** Head teacher **DDSL** **Amy Donovan** Associate head teacher **DDSL** **Rosanna Ojosipe** Deputy head teacher / SENDCo Supported by additional trained members of SLT and the Trust Central Safeguarding Team
NORTH STAR COMMUNITY TRUST CENTRAL SAFEGUARDING TEAM **07701 009 319** **020 8804 4126** (Ext. 620, 627, 647) **020 8843 9631** (Ext. 621)	**DSL** **Zoe Kirby** Head of Safeguarding **DDSL** **Lisa Green** Safeguarding Officer **DDSL** **Jade Tomkinson** Senior Safeguarding Officer **DDSL** **Jane Kerswell** Safeguarding Support Officer

Other important contacts

Enfield's Multi Agency Safeguarding Hub (MASH)	020 8379 5555 / 020 8379 1000 (Out of hours)
Local Authority Designated Officer (LADO)	020 8379 2850 **Cathy Phelan**
Enfield Local Authority Virtual School Head	020 8132 0336 **Suzanne Rowson**
Enfield Local Authority PREVENT Co-ordinator	020 8379 6137 **Sujeevan Ponampalam**
'Prevent' Education Officer	020 8132 2708 **Fathaya Jubani**
NSPCC | Abuse helpline	0800 136 663 help@nspcc.org.uk
NSPCC | Whistleblowing helpline	0800 028 0285

Safeguarding children

1. Introduction

1.1 Enfield Heights Academy's safeguarding policy is embedded into the general ethos of all the academies forming part of North Star Community Trust (NSCT), which is to ensure that our pupils are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to. All staff members should make sure their approach is child centred and that they should consider at all times what is in the best interest of the child.

1.2 This policy has been developed in line with Keeping Children Safe in Education 2026, Working together to Safeguard Children 2026 and additionally has been written to not only reflect the particular needs of the primary and secondary pupils in the community which we serve, but to also allow fluidity of / additional safeguarding and child protection support across our schools by ensuring all NSCT Academies staff are familiar with its requirements.
www.gov.uk/government/publications/keeping-children-safe-in-education--2
www.gov.uk/government/publications/working-together-to-safeguard-children--2

1.3 The Trustees, Governors and staff of our academies fully recognise the contribution they make to safeguarding children. We recognise that all members of staff, including volunteers, contractors and supply / temps, have a full and active part to play in protecting our pupils from harm. Safeguarding is everyone's responsibility.

1.4 All Trustees, Governors and staff believe that our academies should provide caring, positive safe and stimulating environments which promote the social, physical, mental health and moral development of the individual child.

1.5 We recognise that safeguarding includes online safety both inside and outside of the school community. Our separate technology and online safety policy can be found on the policy page of our website. www.enfieldheightsacademy.org.uk/Policies

1.6 When considering the safeguarding needs of looked after children, this policy should be read in line with our looked after children policy which can be found on the policy page of our website. www.enfieldheightsacademy.org.uk/Policies

1.7 We recognise that children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges (both on and offline, inside and outside of school)

1.8 We recognise that children being absent from education for prolonged periods and / or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation (particularly county lines). We also recognise that children being absent or keen to be at home could mean they are witnessing domestic abuse and that children observing this behaviour are victims in their own right.

1.9 Where staff may have concerns that polices or procedures are not being correctly administered, they are encouraged to formally raise this with their line manager and are also made aware of our whistleblowing policy which is available to them on our website and intranet.

1.10 The term 'staff' refers to all staff on site including ancillary, agency and supply staff, students on placement, contractors who work with children, Governors, Trustees and volunteers working with children.

1.11 The term 'child' / 'children' includes everyone under the age of 18 (however any pupil older than 18 but still on roll at a school would be included in the scope of our policies)

1.12 As per our lettings policy we ensure that any organisations or individuals hiring our premises have appropriate safeguarding arrangements in place. Whilst our safeguarding procedures will apply to those attending any activities or services we directly manage (regardless of whether those attendees are known to us) we may consider any concern raised about individuals on our premises in line with our procedures if we feel it is appropriate to do so.

2. The aims of this policy are:

2.1 To support children's development in ways that will foster security, confidence and independence.

2.2 To raise the awareness of both teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.

2.3 To provide a systematic means of monitoring children known or thought to be at risk of harm.

2.4 To emphasise the need for good levels of communication and reporting between all members of staff.

2.5 To maintain a structured procedure which is followed by all members of the school community where abuse is suspected.

2.6 To continue to promote effective working relationships with other agencies, especially the Local Safeguarding Partnership of Police, Children's Social Services and the North Central London Integrated Care System

2.7 To ensure that all adults within our school who have contact with children have been checked as to their suitability as part of the recruitment and selection process in line with 'safer recruitment' recommendations and our safer recruitment procedures which include appropriate online and social media searches.

3. Procedures

Our procedures for safeguarding children will comply with the Safeguarding Enfield Partnership procedures. www.enfield.gov.uk/enfieldlscb who have in turn have adopted and follow the London Child Protection Procedures new.enfield.gov.uk/enfieldlscb/protocolsandprocedures

We will ensure that:

3.1 We have a named safeguarding lead supported by designated members of staff who undertake regular training every two years and regularly update their knowledge and skills. The safeguarding team is clearly identified and all staff are aware. (Please see **APPENDIX 1** for named contacts across our academies)

3.2 All members of staff develop their understanding of the signs and indicators of abuse, neglect and exploitation, online safety expectations, roles and responsibilities in relation to filtering and monitoring and they refresh their training regularly.

3.3 Our academies are aware that additional barriers exist when recognising possible abuse, neglect and exploitation of pupils with additional susceptibilities e.g. a disability, any special educational need, a young carer, those at risk of being drawn into anti-social or criminal behaviour, those who are Lesbian, Gay, Bisexual or Questioning their gender (or perceived to be), those who go missing from home or care or those in a family circumstance presenting challenges to the child (e.g. those with a family member involved in offending or in prison or those subject to a private fostering arrangement or those who are care leavers). Our training prepares staff to recognise and respond to the additional susceptibilities of these pupils including where we should or must provide additional information to the local authority.

3.4 All members of staff are trained in how to respond to a pupil who discloses abuse.

3.5 Parents / carers are made aware of the responsibilities of staff members with regard to child protection procedures.

3.6 Concerns, case management discussions and decisions made and the reasons for those decisions will be recorded. This information will be shared only with staff who need to know and will be stored securely on our electronic reporting tool (CPOMS).

3.7 Staff understanding of their responsibilities is monitored through regular training throughout the academic year including knowledge checks and regular updates

3.8 All staff will have read the Government Guidance, *Keeping children safe in education 2026: part one*. This guidance contains and refers to specific safeguarding issues and provides links to further information
www.gov.uk/government/publications/keeping-children-safe-in-education--2

3.9 All staff are required to have read the school safeguarding and child protection policy.

3.10 All new members of staff (and existing staff on an annual basis) will be, depending on their role, required to confirm they have read and understood, regardless of whether they have direct contact with children, all of *Keeping children safe in education 2026: part one* in full
www.gov.uk/government/publications/keeping-children-safe-in-education--2

3.11 Staff will be made aware of our child protection procedures (Please see **APPENDIX 3**)

3.12 All staff will participate in whole staff training each September (or at appropriate catch-up sessions throughout the year) to be delivered by the Head of Safeguarding or safeguarding team

3.13 Safeguarding is a standing agenda item for Governors at our termly Academy Advisory Committee (AAC) meetings. At least one Governor will be assigned the lead remit of safeguarding.

3.14 The Trust's Board will ensure at least one Trustee is assigned the lead remit of safeguarding.

3.15 Our procedures will be regularly reviewed and up-dated.

4. Responsibilities

4.1 As per Paragraph 63 of Keeping Children Safe in Education 2026, 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.

When to call the police guidance for schools and colleges' www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf

All staff must: -

- maintain an attitude of "*it could happen here*" where safeguarding is concerned
- always act in the best interests of the child with a child centred approach
- build a trusting professional relationship with children so they feel able to talk to an adult when they have a concern and when they are ready to do so and be mindful that children may not necessarily choose to disclose to an adult they are in regular contact with.
- always seek the voice of the child when discussing concerns with them and help them overcome potential barriers to having their voice heard (such as a special educational need, disability, language barrier or sexual orientation)
- immediately act on any concerns they have about a child's welfare

The designated safeguarding staff teams are responsible for: -

Managing referrals

4.1.1 refer cases of suspected abuse, neglect and exploitation to the local authority children's social care as required; including where a child is suffering or is likely to suffer harm.

4.1.2 support staff who make referrals to local authority children's social care;

4.1.3 refer cases to the Channel programme where there is a radicalisation concern as required;

4.1.4 support staff who make referrals to the Channel programme;

4.1.5 refer cases where a person is dismissed or left due to risk of harm to a child to the Disclosure and Barring Service and the Teaching Regulation Agency as required; and

4.1.6 refer cases where a crime may have been committed to the police where appropriate.

Working with others

4.1.7 act as a point of contact with our safeguarding partners (see section 2.6 above) ensuring our policy reflects the local criteria for action and the local protocol for assessment;

4.1.8 liaise with the head teacher or principal to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance PACE Code C 2019;

4.1.9 as required, liaise with the Trust-appointed case manager and with the Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a staff member;

4.1.10 liaise with other staff / agencies (especially pastoral support staff, school nurses, IT technicians, SENDCOs and Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) when deciding whether to make a referral so that a child's needs are considered holistically;

4.1.11 ensure the voice of the child is listened to and considered in relation to any concerns raised;

4.1.12 act as a source of support, advice and expertise for all staff.

4.1.13 liaise with the school appointed senior mental health lead where safeguarding concerns are linked to mental health

4.1.14 promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances

4.1.15 work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing (or have experienced) and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college.

This includes ensuring that the school knows its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes

Keeping records

4.1.16 Adhering to the Enfield Safeguarding Children's Partnership arrangements and academy procedures with regard to referring a child if there are concerns about possible abuse, neglect or exploitation.

4.1.17 Keeping written records of concerns about a child even if there is no need to make an immediate referral.

4.1.18 Ensuring that all such records are kept confidentially, securely and separate from the main pupil record, in accordance with the academy's safeguarding and record-keeping procedures.

4.1.19 Ensuring that *Children's social care* are made aware of relevant information pertaining to any pupils who currently have a social worker or when responding to attendance concerns and considering the provision of pastoral or academic support which indicates that their level of risk has increased.

4.2 **All** members of staff (paid and unpaid) have the statutory responsibility to safeguard and promote the welfare of children and receive training in what to do if a child tells them that he or she is being abused or neglected.

4.3 All staff receive training around the local early help process and their role in it as well as the process for making referrals to children's social care and the role that they may be asked to play in section 17 or section 47 assessments.

4.4 All staff must be aware that they must not assume a colleague or another professional will act and that they must share information that might be critical in keeping a child safe. Where a member of staff remains concerned that appropriate action has not been taken, they should follow the academy's safeguarding escalation procedures and speak to the designated safeguarding lead or deputy.

4.5 All staff are made aware through regular training of their duty to raise concerns, where they exist, about the attitude or actions of colleagues.

5. Supporting children

5.1 We recognise that: -

- a child who is abused or is a witness to violence (including domestic violence) may find it difficult to develop and maintain a sense of self-worth
- a child in these circumstances may feel helpless and / or humiliated.
- a child may feel self-blame.
- a child may not recognise their experiences as abuse
- online safety is a key part of safeguarding our pupils as young people often don't see the internet as a separate part of their lives.

5.2 We also recognise that the academy may provide the only stability in the lives of children who have been abused or who are at risk of harm.

5.3 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

5.4 Our academies will support all pupils by:

5.4.1 Encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying.

5.4.2 Promoting a caring, safe and positive environment within the school where children are encouraged to talk about their wishes and feelings in order that they can confidently report abuse knowing that their concerns will be treated seriously and that they can safely express their views and give feedback.

5.4.3 Liaising and working together with all other support services and those agencies involved in the safeguarding of children.

5.4.4 Giving consideration to the contextual safeguarding issues our demographic and surrounding areas may bring

5.4.5 Where a child is suffering, or is likely to suffer, harm, making a referral to local authority children's social care and, if appropriate, the police immediately. Referrals should follow the local referral process.

5.4.6 When a pupil about whom there are ongoing or recent concerns leaves an academy, we will provide them with continuing support by ensuring that appropriate information is securely and confidentially forwarded to the pupil's new school.

5.4.7 Where we have placed a child with an alternate provision provider, we will continue to be responsible for the safeguarding of that child and will ensure the placement meets the needs of our children.

5.5 We recognise that children on work experience or those who are volunteers may also need appropriate safeguarding support.

6. Children and the court system

6.1 We recognise that children may sometimes be required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

The following national guidance is available: -

- Young witness booklet for 5 – to 11 year olds
  www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds
- Young witness booklet for 12 – to 17 year olds
  www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds

6.2 Additionally making child arrangements via the family courts following separation can sometimes be stressful and entrench conflict in families as well as be stressful for children

The following guidance is available from the ministry of justice with regard to information on the dispute resolution service: -

- Get help with child arrangements
  https://helpwithchildarrangements.service.justice.gov.uk/

7. Children who are questioning their gender

7.1 The academy will respond to children who are questioning their gender in accordance with the safeguarding principles and requirements set out in KCSIE 2026. The individual circumstances,

welfare and best interests of the child will be considered. Any safeguarding concerns will be considered on an individual basis and dealt with in accordance with this policy and the academy's child protection procedures.

7.2 Where there are concerns that a child is suffering, or is likely to suffer, harm, the academy will follow the referral requirements set out in this policy and KCSIE 2026, including making an immediate referral to local authority children's social care and, where appropriate, the police.

7.3 The fact that a child is questioning their gender does not, in itself, mean that a referral to children's social care is required. The academy will consider the individual circumstances of the child and all relevant safeguarding information when deciding what action is required.

8. Confidentiality

8.1 We recognise that all matters relating to Child Protection are confidential in addition to our duty to comply with applicable data protection legislation, including the UK GDPR and the Data Protection Act 2018. Consideration will be given to when and how it is appropriate to share information to ensure effective working to protect children. Data protection legislation does not prevent the sharing of information where this is necessary to safeguard and promote the welfare of children.

8.2 The Head teacher or designated member of staff will only disclose information about a pupil to other members of staff on a '*need to know*' basis where it is appropriate in order to support and protect the child effectively.

8.3 All staff must be aware that they have a professional responsibility to share information with other agencies where it is necessary in order to safeguard children and must follow the academy's information-sharing procedures.

8.4 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.

9. Supporting staff

9.1 We recognise that staff working in our academies who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

9.2 We will support such staff by providing an opportunity to talk through their anxieties with an appropriate member of staff and will seek further support as appropriate. The Trust's '*Health Shield*' schemes is also available to our employees to provide independent support.

10. Key safeguarding focus areas for our school

10.1 We recognise that the safeguarding priorities for our school may change over time, given the context of our children and the local community. For the academic year 2026-2027, we have identified that the key priorities will include: -

- Child on Child Abuse (including HSB (Harmful Sexual Behaviours), relationships and sex / health education)

- Domestic Abuse including recognising that children who witness or live with domestic abuse are victims in their own right
- Online safety in school and out in the community including AI monitoring responsibilities
- Attendance
- Embedding a safeguarding culture
- PREVENT

Child protection procedures

There are essentially four key steps to remember and this procedure explains them. They are referred to as the **4 Rs**:

- **Recognising** abuse, neglect and exploitation (including concerns around child on child on peer abuse)
- **Responding** to the concerns
- **Referring** concerns on
- **Recording** any actions taken and outcomes.

Members of our academy workforce could have their suspicion or concern raised in a number of ways, the most likely of which can be one or more of the following:

- A child 'disclosing' abuse
- Bruising or evidence of physical hurt
- Unusual behaviour by a child
- The conduct of a member of the academy's workforce

Concerns may also arise from information shared by another child, parent/carer, professional or other person, from information obtained online, or from patterns of behaviour, attendance, absence or other indicators that cause concern.

Staff are aware that safeguarding concerns may arise about a child's welfare both inside and outside of the school, including online. Staff should consider the full context of a child's circumstances when responding to concerns.

Concerns about a specific child should be reported immediately to a member of the Designated Safeguarding Team (See **APPENDIX 1**) and confirmed in writing within 24 hours.

Reports should usually be made using the *CPOMS* portal, but direct contact with a member of the safeguarding team by phone, email or face-to-face can also be made if the portal is for any reason unavailable to the member of staff.

Where the situation is urgent and a delay could endanger or cause increased risk to a child or could result in evidence being lost, staff should make direct contact with the Designated Safeguarding Team to make them aware that the report will follow.

If a child is suffering from harm, likely to suffer from harm or is in immediate danger contact with children's social care (and the police, if appropriate) should be made immediately.

A referral to the Enfield Children's MASH can be made by any staff member by accessing the Children's Portal on the Enfield website or by calling **0208 379 5555**. This should be reported to the DSL team as soon as possible (who can also make the referral on staff's behalf).

https://new.enfield.gov.uk/services/children-and-education/childrens-portal/

All staff are aware that ***any*** delay could prejudice the welfare of a child.

How to respond to a disclosure by a child

- Stay calm.
- Listen carefully to what is said.
- Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others (i.e. **do not promise to keep secrets**)
- Tell the child that the matter will need to be shared but will only be disclosed to those who need to know about it.
- Allow the child to continue at their own pace.
- Ask questions for clarification only, and at all times avoid asking leading questions.
- Avoid closed questions / Use open questions e.g. TED (Tell, Explain, Describe)
- Reassure the child that they have done the right thing in telling you.
- Tell them what you will do next, and with whom the information will be shared.
- Using the child's own words, record in writing what was said as soon as possible after the event – note the date, time, location of discloser, any names mentioned, to whom the information was given and ensure that the record is signed and dated.

Staff should not investigate concerns themselves. They should share concerns promptly with the Designated Safeguarding Team/DSL and provide factual information about what they have seen, heard or been told.

It is important to remember that the person who first encounters a case of alleged abuse, neglect or exploitation is not responsible for deciding whether it has occurred. That is a task for the professional child protection agencies, following consideration and referral from the Designated Safeguarding Team

Action staff must take immediately when a concern arises

1. Report the concern immediately to the Designated Safeguarding Team (See **APPENDIX 1**). They will then determine the next steps to take, including consultation with other professional agencies (e.g. Enfield Children's MASH) in order to determine the best course of action. Consideration will need to be given as to whether the concern involves an immediate risk of significant harm, a clear allegation of abuse, neglect or exploitation by the child, or does not involve an immediate risk of significant harm.

2. Where a child is in immediate danger or is at risk of harm, staff should consider whether delaying action while waiting to speak to the DSL will cause further harm and if so, they should contact children's social care and/or the police as appropriate and then inform the DSL as soon as possible.

3. It is not the responsibility of any member of academy staff (including the Designated Safeguarding Team) to determine if abuse, neglect or exploitation has taken place; rather they are responsible for reporting on their concerns to the appropriate authorities.

4. Concerns that are anonymous or that relate to historical concerns (e.g. relating to previous staff or an incident that happened some time ago) should not be ignored and must be reported to the Designated Safeguarding Team.

5. A record of the concern will be held and may be shared or used for the purposes of tackling abuse, neglect or exploitation and promoting the welfare of the child.

6. Remember: Do not delay reporting the matter by trying to obtain more information.

7. You should **never** remove clothing in order to examine the child where they are alleging injuries unless there is a clear need to do so in order to administer first aid.

8. Remember: Some children have an increased risk of abuse, neglect or exploitation both on and offline

9. Staff should recognise that children may be particularly vulnerable to abuse, neglect and exploitation because of their individual circumstances, and that vulnerability should be considered on an individual basis rather than through assumptions based on a particular group or characteristic.

10. Where concerns relate to child-on-child abuse, including sexual violence or sexual harassment, staff must follow the academy's child-on-child abuse procedures and should not dismiss such behaviour as 'banter', 'just having a laugh', 'part of growing up' or anything similar. (Please see **APPENDIX 6**)

Information Sharing and the Child Protection File

- Records regarding concerns and their follow up and resolution including actions taken, decisions and the outcomes will be stored securely and separately from the child's original school file. The information contained in these records will only be shared with staff who need to know in order to safeguard the child and others.

- The school will ensure that information is shared lawfully and appropriately, in accordance with the Data Protection Act 2018, UK GDPR, and relevant safeguarding information-sharing guidance and we recognise the exemptions in these legislations which allow us to share information where it is necessary to protect a child

- The fact that information is considered confidential does not prevent it being shared where there is a lawful basis to do so and sharing is necessary to safeguard and promote the welfare of a child.

- Where children leave the school, the designated safeguarding team will ensure that the safeguarding and / or child protection files are transferred to the receiving school or college as soon as possible and within five days for an in-year transfer or within the first five days of the start of a new term. Confirmation of receipt will be requested.

- The child protection file will be transferred separately from the main pupil file, securely, and confirmation of receipt should be obtained.

Early help assessment process guide

Introduction

We recognise that the academy plays a significant part in the prevention of harm to our pupils by providing pupils with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The school community will therefore: -

- Ensure and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Ensure that all children, parents and carers know there are adults in the school whom they can approach if they are worried or in difficulty.
- Include in the curriculum opportunities for PSHE which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.

Our regular safeguarding case management meetings are utilised to identify and support children who may need additional help either in school or through accessing early help / family help services.

Early help assessment process

Our academies recognise the importance of effectively using the local early help and Family Help arrangements to access support for children and their families and we recognise that every person whose role involves working with children and young people needs to be prepared and able to recognise the need for support. We aim to use the early help and family help process to assist early identification and provide the appropriate support for individual pupils and their families, taking account of the child's wishes and feelings and the family's strengths and circumstances.

We use the early help or family help assessment process when: -

- There is a concern about a child's health, welfare, progress in learning or other aspect of their wellbeing
- A child's needs are unclear, different from the norm and / or broader than the school can address
- A child or family would benefit from additional support to prevent needs escalating and to improve outcomes.

Using an early help or family help assessment process will help identify a child's needs and / or get other services involved to help meet them. Where a child is already receiving support, the academy will share relevant information and contribute to existing plans and assessments, rather than duplicating work unnecessarily.

The academy will take a child-centred and strengths-based approach, considering the child's individual circumstances, needs, wishes and feelings, as well as the strengths and support available within the family and wider network.

The elements that form the Early Help Framework will include collecting together and sharing information about all the following areas: -

- general health
- physical development
- speech, language and communication development
- emotional and social development
- behaviour development
- self-esteem, self-image and social presentation
- family and social relationships
- self-care skills and independence
- learning, including: understanding, reasoning and problem-solving, progress and achievement in learning, participation in learning, educational aspirations
- basic parental care, including safety and protection
- emotional warmth and family stability
- parental guidance, behaviour boundaries and stimulation at home
- family history, including functioning and wellbeing
- wider family
- housing and financial considerations
- social and community factors

Any child may benefit from the early help but (in line with Working together to safeguard children 2026) as a Trust we are particularly alert to the potential need for early help for a child who: -

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing / goes missing from education, home or care,
- has been repeatedly removed from the classroom is on a part-time timetable, 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 is at risk of being radicalised into terrorism
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- 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
- is pregnant and / or is a parent themselves
- has exhibited early signs of abusive, violent and / or harmful behaviours

Completing the assessment

It may be necessary to complete an early help assessment on a pupil at any time. The decision to carry out the assessment will usually be taken jointly with the relevant staff and a member of the senior leadership team (SLT) or safeguarding team, the pupil (where appropriate) and parent / carers using the following guidelines: -

1. Any concerns will be discussed with the pupil (where appropriate), parents and other agencies already involved with the child. (If a parent refuses to cooperate we will clearly record that agreement to complete the EHR has been refused.) Where we are concerned about a child's welfare or safety we will seek immediate advice from Children's MASH or refer on safeguarding grounds via the Children's Portal.

2. A number of agencies may take the lead role in co-ordinating help for families at this level including education, welfare, health, schools early help team services (parent support unit, change and challenge team, children's centres) or agencies such as the behaviour support service (SWERL) or CHEVIOTS the joint service for disabled children.

Policy on safeguarding young people at risk of so called 'honour based' abuse including forced marriage and female genital mutilation

So called 'honour based' abuse

There is no honour in threatening or harming others with violence. A small number of women and men experience violence of threats from their family or community to protect perceived family "honour".

So called 'honour based' abuse (HBA) encompasses incidents or crimes that have been committed to protect or defend the honour of the family and or community and this can include female genital mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider family or community pressure and can include multiple perpetrators.

All forms of honour based abuse is abuse (regardless of motivation) and should be handled and escalated as such. There is no justifiable religious or cultural basis to this abuse. It is a crime and must be treated as such.

Members of the school community who are in fear of this kind of violence or believe that someone may be suffering may not always recognise the seriousness of the situation or may not come forward as they are too frightened or feel disloyal to their family or community for speaking out. We take these issues seriously and addresses them during regular staff training. All staff members are encouraged to report any concerns to the safeguarding team who will look to provide sensitive and appropriate support at every stage of the process and can contact agencies that offer advice and support. (See **APPENDIX 1**)

Warning signs of possible so called honour based violence

- Broken communication between the victim and friends
- Absence from education / the workplace
- Criticism of the victim for "western" adoption of dress / make up
- Restrictions in leaving the house or being accompanied outside the home
- Depressive or suicidal tendencies in an otherwise happy person

Female Genital Mutilation

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.

Section 5B of the Female Genital Mutilation Act 2003 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 that FGM appears to have been carried out on a girl under 18. The duty applies where the case is known to teachers, including through a disclosure by the victim or visual evidence

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 students. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out as per Keeping Children Safe in Education 2026.

Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate.
https://assets.publishing.service.gov.uk/media/5a7f152ded915d74e33f4395/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

If any of the above concerns are brought to the attention of any of our designated child protection teams, they will be immediately reported to the Local Authority's Children's Services.

Indicators that FGM may have taken place include:

- Family comes from a community that is known to practice FGM
- Girls and young women who are British citizens but whose parents were born in countries that practice FGM, may also be at risk.
- Having returned from a holiday in a country known to practice FGM, a girl or young woman presents as suffering emotional / psychological effects (e.g. withdrawal, depression etc) or physical effects (e.g. unable to properly sit in a chair) of undergoing FGM.
- A girl or young woman regularly spends time out of class or from other activities with bladder or menstrual problems etc.
- A girl or young woman requiring to be excused from PE without the support of her GP doctor.

Indicators that FGM may be about to take place include:

- A family from a country known to practice FGM is known to be planning a holiday to a country known to practice FGM;

  and particularly where: -

- A girl or young woman expressing anxiety about a special procedure or a special occasion which may include discussion of a holiday to their country of origin;
- A girl or young woman may refer to FGM either in relation to themselves or another family member or friend;
- A girl or young woman requesting help to prevent it happening;
- Others may indicate some concern about a girl or young woman

Support and information can also be obtained from

The Agency for Culture and Change Management (ACCM)
www.accmuk.com
Tel: 01234 356 910

Forced marriage

Forced marriage should not be confused with an arranged marriage. Parties within an arranged marriage have the choice to accept the arrangement or not. The tradition of arranged marriages has operated successfully within many communities and countries for a very long time.

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 as a way to coerce a person into marriage.

It is illegal to cause a child under the age of 18 to marry even if violence, threats or coercion are not used.

Schools and colleges can play an important role in safeguarding children from forced marriage.

Awareness of the issue of forced marriage is raised through our regular safeguarding training. If staff are worried that they, or someone else, might be forced into marriage we encourage them to speak to the safeguarding team who can signpost them to appropriate support. (See **APPENDIX 1**)

The national Forced Marriage Unit (FMU) can also be contacted for advice.
020 7008 0151
www.gov.uk/stop-forced-marriage

Child-on-child abuse including child-on-child sexual violence and sexual harassment as well as up skirting

We recognise that abuse is abuse. We take a zero tolerance approach to all abuse (including transphobia). It is never acceptable for abuse or sexual harassment to be tolerated or passed off as "*banter*", "*just having a laugh*", "*part of growing up*" or "*boys being boys*".

We recognise that child-on-child abuse can happen online and offline, inside and outside of school, and that children may be both victims and perpetrators of abuse. We will take all reports seriously and respond in a way that considers the individual circumstances of each child.

Child-on-child abuse

We recognise the gendered nature of child-on-child abuse and are aware that not only are females at higher risk of experiencing it, but also that children who are (or are perceived to be) lesbian, gay bisexual or gender questioning can also be particularly susceptible as well as SEND pupils being three times more likely to be abused by peers.

All child-on-child abuse is unacceptable and will not be tolerated as we create a safe environment for our children, recognising that it can happen inside and outside of school and online. A victim is never causing a problem by reporting abuse and a victim should never be made to feel ashamed for making a report of harassment or violence. We will ensure all victims are reassured that they are being taken seriously and we will support and keep them safe. Child-on-child abuse is most likely to include, but is not limited to: -

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (this can be recognised as “teenage relationship abuse”);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and / or encourages physical abuse);
- physical behaviour (such as grabbing bottoms / breasts / genitalia, pulling down trousers, flicking bras, lifting skirts)
- 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) and causing someone to engage in sexual activity without consent.;
- sexual harassment (i.e.unwanted conduct of a sexual nature), 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;

- sharing self-generated intimate images and / or videos, including images or videos generated using artificial intelligence (AI), such as deepfakes;

- up skirting, which is an offence under section 67A of the Sexual Offences Act 2003 and involves operating equipment beneath another person's clothing, with the intention of enabling a person to see their genitals or buttocks, whether exposed or covered by underwear, to obtain sexual gratification or to cause humiliation, distress or alarm.

- 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).

- displaying or generating pictures, photos or drawings of a sexual nature

We recognise that some children may be more vulnerable to child-on-child abuse because of their individual circumstances, including age, sex, disability, special educational needs, sexual orientation, gender reassignment, or other characteristics. We will consider the individual circumstances and vulnerabilities of each child when responding to concerns.

It is not enough to respond to incidents as they arise, even if there are no reports in our schools it does not mean it is not happening it may be the case that it is just not being reported. We maintain an attitude of "*it could happen here*" where safeguarding is concerned.

Through the promotion of our values, we strive to create an environment that actively discourages abuse and challenges the attitudes which underlie it. We also consider our physical environment in and outside of the school gates and think about how we can make any unsafe spaces safer.

Bullying, emotional and physical abuse including initiation / hazing-type violence and rituals

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse as bullying, fighting and harassment between pupils are not generally seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if: -

- there is a large difference in power between the young people concerned; or

- the perpetrator has repeatedly tried to harm one or more other children; or

- there are concerns about the intention of the alleged perpetrator

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive regardless of whether or not severe harm was actually caused.

Child-on-child sexual violence or sexual harassment

When a child (anyone under the age of 18) commits an act of sexual violence or harassment against another child, consideration should always be given that this may constitute abuse. Sexual abuse may fall under one of two categories: -

Sexual violence	rape, assault by penetration, sexual assault (intentional sexual touching) or causing someone to engage in sexual activity.

Sexual harassment	unwanted conduct of a sexual nature – such as sexual comments, sexual jokes or taunting, physical behaviour like interfering with clothes, up skirting or online harassment. We are aware this can occur online and face-to-face both inside and outside of the school environment

Protection and action to be taken

Should it be deemed that a young person or child (or group of children) may have abused another, a report should immediately be made as per our usual Safeguarding procedures. All reports will be taken seriously and dealt with on a case-by-case basis. The school will consider the wishes and feelings of the victim, the alleged perpetrator and any other children affected, alongside the need to safeguard all children.

The school will act in accordance with DfE guidance; Part 5 of Keeping Children Safe in Education

The designated Safeguarding Lead will notify children's social care and the police as appropriate.

It should be recognised that it is of the utmost importance that the needs and safety of both the alleged perpetrator and the victim are considered. Issues relating to the safety of victims and potential victims must be discussed first and completely separately from any issues relating to the needs of the alleged perpetrator.

The safeguarding team will consider the potential susceptibilities of the victim including those due to protected characteristics.

The response to reports of child-on-child sexual violence and sexual harassment will be decided on a case-by-case basis with the designated safeguarding lead team (DSLs) taking a lead role, supported by other agencies as required. Multi agency advice and support should always be sought in cases involving sexual assault and violence.

Where there has been a report of sexual violence, the designated safeguarding lead (or another member of the safeguarding team) should immediately consider the risks to: -

- the victim, especially their protection and support
- the alleged perpetrator
- all other children at the school (and adult students and staff, if appropriate), especially any actions that are appropriate to protect them

Where there has been a report of sexual harassment, the school will consider whether the behaviour is part of a wider pattern of abuse and whether there are risks to other children, including those who may have witnessed or been affected by the behaviour.

The need for protective and supportive measures should be considered on a case-by-case basis with consideration being given to how to keep the victim and alleged perpetrator a reasonable distance apart whilst they are on the same premises.

Where scenarios involve working with children's social care, staff must not wait for the outcome of an investigation before protecting the victim and other children - the Safeguarding Team must work closely with children's social care to ensure the academy's actions do not jeopardise a statutory investigation. There must be immediate consideration for safeguarding the victim, alleged perpetrator and all other children above all else.

In cases of sexual abuse, it is especially important that consideration is given to the needs of both parties and particularly the victim with regard to confidentiality.

Information should be shared within the school community on a '*need to know'* basis only where it is necessary for an effective investigation, to resolve issues or to protect the safety and wellbeing of one or both parties. All staff who are aware of sensitive information must be made clearly aware of the importance of maintaining confidentiality.

Additional help and advice for staff and young people

The NSPCC's dedicated helpline for children and young people who have experienced abuse at school can be accessed via **0808 800 5000** or by email at help@nspcc.org.uk.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed an online resource which works to prevent harmful sexual behaviour
https://shorespace.org.uk/
Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

Consensual and non-consensual sharing of self-generated intimate images and / or videos (including those generated using AI and deepfakes)

Introduction

Self-generated intimate images and/or videos are images, videos or live streams created by a child or young person under the age of 18, or of a child or young person under the age of 18, which are intimate or sexual in nature. This may include images or videos generated or manipulated using artificial intelligence, including deepfakes

This could be via social media, gaming platforms, messaging and chat apps, online forums or other digital services, including through direct sharing between devices via services such as Apple's AirDrop which works offline.

All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether the image or video was made or shared consensually or non-consensually. The response should be proportionate and take account of the age, development and circumstances of the children involved, including any elements of coercion, exploitation or vulnerability. however, it should be noted this is a criminal offence.

The academy recognises that the making or sharing of nudes or semi-nudes may occur as a result of experimentation, pressure, coercion, exploitation, abuse or harmful sexual behaviour. Each incident will therefore be considered on its individual circumstances.

We take a pro-active approach to help students to understand, assess, manage and avoid the risks associated with 'online activity'. We recognise our duty of care to young people who do find themselves involved in such activity and our responsibility to report such behaviours where legal or safeguarding boundaries are crossed.

It is likely that no two cases will be the same and it is necessary to carefully consider each case on its own merit. However, it is important that we apply a consistent approach wherever possible when dealing with an incident to help protect young people and the school. For this reason, the Designated Safeguarding Lead and the Academy Head teacher needs to be informed of any incident involving the making or sharing of nudes or semi-nudes. The range of contributory factors in each case also needs to be considered in order to determine an appropriate and proportionate response.

AI-generated images and videos

The academy recognises that children may use artificial intelligence (AI) tools to create, alter or manipulate images or videos of themselves or other children, including images or videos of a sexual nature. This may include so-called 'deepfake' or digitally manipulated intimate images.

AI-generated or manipulated images of children may cause significant harm and may constitute child-on-child abuse, sexual harassment, sexual violence, exploitation or other safeguarding concerns. The fact that an image has been digitally generated or manipulated does not reduce the seriousness of the concern.
Any concern involving an AI-generated or manipulated nude or semi-nude image of a child must be reported immediately to the Designated Safeguarding Team and managed in accordance with the

academy's safeguarding and child protection procedures. Staff should not ask a child to send, forward, download or show them the image.

The academy will consider the circumstances of each incident on a case-by-case basis, including whether the image was created or shared consensually, whether the child depicted consented to its creation or sharing, whether there has been coercion, bullying, harassment, exploitation or financial extortion, and whether other children may be at risk. Where appropriate, advice will be sought from children's social care and/or the police.

Staff should not attempt to investigate or verify AI-generated or manipulated images themselves. Any available information should be recorded factually and passed to the Designated Safeguarding Team, who will determine the appropriate safeguarding response.

Disclosure by a student

Concerns about the making or sharing of nudes or semi-nudes should follow the normal safeguarding practices and protocols. A student is likely to be very distressed especially if the image has been circulated widely and if they don't know who has shared it, seen it or where it has ended up.

It is important to recognise that they will need pastoral support during the disclosure and after the event.

It is vital that victims and those reporting concerns are taken seriously, kept safe and never made to feel like they are creating a problem by making a report. They may even need immediate protection or a referral to police or social services; parents should be informed as soon as possible (police advice permitting).

The following questions will help decide upon the best course of action: -

- is the student disclosing about making, receiving or sharing a nude or semi-nude image or video?
- what sort of image is it?
- is it potentially illegal or is it inappropriate?
- are the school child protection and safeguarding policies and practices being followed? *For this reason, a member of the Safeguarding team should be involved as soon as possible*.
- how widely has the image been shared and is the device in their possession?
- is it a school device or a personal device?
- does the student need immediate support and / or protection?
- are there other students and / or young people involved?
- do they know where the image has ended up?

The Designated Safeguarding Lead will consider the individual circumstances of the incident and determine the appropriate safeguarding response on a proportionate, case-by-case basis.

Responding to incidents

All incidents involving the making or sharing of nudes or semi-nudes will be treated as safeguarding concerns and recorded accordingly. A consensual incident may require a different response from a non-consensual incident, but both require a safeguarding response.

The academy will consider:

- the age and developmental stage of the children involved;
- whether the image was made or shared consensually;
- whether consent was freely given and whether there was pressure or coercion;
- whether the image has been shared without consent;
- whether there is evidence of sexual harassment, sexual violence, abuse or exploitation;
- whether an adult is involved;
- whether there are particular vulnerabilities or additional safeguarding concerns;
- the impact on the child and any need for immediate protection or support;
- whether advice or referral to children's social care and/or the police is required.

The academy will not assume that a child who has made or shared an image is responsible for any subsequent misuse or distribution of that image.

Handling images

It is vital that we always put the young person first.

Staff should not ask a child to send, forward, download or show them a nude or semi-nude image. Staff should not copy, print, save, store or distribute the image.

Where an image is reported, staff should avoid viewing it unless this is necessary and lawful as part of an appropriate safeguarding response. The Designated Safeguarding Lead should be informed immediately and the academy should follow the relevant DfE/UKCIS guidance.

Staff should not investigate the incident themselves or attempt to establish the full circumstances by accessing or examining images.

Always

- Inform and involve the Safeguarding Team.
- Record the incident.

- Ensure that the Designated Safeguarding Lead considers the safeguarding needs of the child and determines whether further advice or referral is required.
- Consider whether the image or video has been shared online and whether action is required to reduce further harm.

Never

- Print out any material for evidence.
- Move any material from one storage device to another.
- Ask a pupil to share the image with you.
- Forward, copy, save, store or distribute a nude or semi-nude image.
- Ask another child to show or forward the image.

Searching a device

It is vital that we always put the young person first. Staff will not search the device if this will cause additional stress to the student / person whose image has been distributed ***unless*** there is clear evidence to suggest not to do so would impede a police inquiry. Instead wherever possible we will rely on the description by the young person, secure the device and contact the Police.

The Education Act 2011 allows for a device to be examined, confiscated and securely stored if there is reason to believe it contains indecent images or extreme pornography.

On occasions where searching a device is deemed necessary we will do so in line with our searching and confiscation policy (available on the website)

If it is necessary to search a device then, where possible, the search should be conducted by someone of the same gender as the person whose image is being sought.

Wherever possible we will not search a mobile device even in response to an allegation or disclosure if this is likely to cause additional stress to the student / young person.

Handling images if an indecent image or extreme pornography is identified: -

Always

- Inform and involve the Safeguarding Team who will ensure that the Designated Safeguarding Lead is able to take any necessary strategic decisions.
- Record the incident.
- If there is an indecent image of a child on a website or a social networking site, then the Safeguarding Team will report the image to the site hosting it.

  Under normal circumstances the team would follow the reporting procedures on the respective website; however, in the case of a making or sharing nudes or semi-nudes incident involving a child or young person where it may be felt that they may be at risk of abuse, the team will report the incident directly to CEOP (child exploitation and online protection command) so that law

enforcement can make an assessment, expedite the case with the relevant provider and ensure that appropriate action is taken to safeguard the child.

Never

- Print out any material for evidence.
- Move any material from one storage device to another.
- Ask a pupil to share the image with you

Handling images if the image has been shared across a personal mobile device: -

Always

- Confiscate and secure the device(s) and (if appropriate) gather password / unlock code.
- Close down or switch the device off as soon as possible. This may prevent anyone removing evidence 'remotely'

Never

- View the image unless there is a clear reason to do so or view it without an additional adult present (this additional person does not need to view the image and certainly should not do so if they are of a different gender to the person whose image has been shared.
- Send, share or save the image anywhere.
- Allow students to do any of the above.

Who should deal with the incident

The person to whom the initial disclosure is made to must act in accordance with the school safeguarding and / or child protection policy in ensuring that a member of the Safeguarding Team and a senior member of staff are involved in dealing with the incident.

The Designated Safeguarding Lead should always record the incident. The Head teacher must also always be informed.

Deciding on a response

There may be many reasons why a student has engaged in making or sharing nudes or semi-nudes e.g. it may be a romantic / sexual exploration scenario or it may be due to coercion. It is important to remember that it won't always be appropriate to inform the police; this will depend on the nature of the incident.
However, all incidents involving the making or sharing of nudes or semi-nudes must receive a safeguarding response. The response should be proportionate and consider the age, development and circumstances of the children involved, including any elements of coercion, exploitation or vulnerability.

It is important that incidents are always consistently recorded. It may also be necessary to assist the young person in removing the image from a website or elsewhere.

If indecent images of a young person are found, the Safeguarding Team will make referrals and contact the police if appropriate. Referrals may be made to social care, but where it may be thought that a crime may have taken place, the police should be contacted.

Young persons who have engaged in making or sharing of nudes or semi-nudes which is contained between two persons may be referred to the Multi Agency Safeguarding Hub (MASH) in order to identify if any support and guidance may be accessed. Those who are felt to be victims of the non-consensual sharing of nudes or semi-nudes may also be referred to the MASH at a point where the police feel that this will not impede an investigation.

The academy will put the necessary safeguards in place for the student (e.g. they may need counselling support or immediate protection). The head teacher or a member of the Designated Safeguarding Team should inform parents and / or carers about the incident and how it is being managed, unless there is a clear risk in doing so. The parent / carer may choose to inform the police themselves.

Containment and prevention

The young persons involved in the making or sharing of nudes or semi-nudes may be left feeling sensitive and susceptible for some time. They will require monitoring by and support from appropriate adults within the academy setting.

Where cases of the making or sharing of nudes or semi-nudes become widespread or there is thought to be the possibility of contagion then the school will reinforce the need for safer 'online' behaviour using a variety of resources.

Other staff may need to be informed of incidents and should be prepared to act if the issue is continued or referred to by other students.

The pupils' parents should usually be told what has happened so that they can keep a watchful eye over the young person especially when they are online at home.

The academy, its students and parents should be on high alert, challenging behaviour and ensuring that the victim is well cared for and protected.

The legal position

It is important to be aware that young people involved in sharing sexual videos and pictures may be committing a criminal offence. Specifically, crimes involving indecent photographs (including pseudo images) of a person under 18 years of age fall under Section 1 of the Protection of Children Act 1978 and Section 160 of the Criminal Justice Act 1988.

Under this legislation it is a crime to: -

- Take an indecent photograph or allow an indecent photograph to be taken;
- Make an indecent photograph (this includes downloading or opening an image that has been sent via email);
- Distribute or show such an image;

- Possess with the intention of distributing images;

- Advertise and possess such images.

While any decision to charge individuals for such offences is a matter for the Crown Prosecution Service, it is unlikely to be considered in the public interest to prosecute children. However, children and young people need to be aware that they may be breaking the law. If they send or possess images they may be visited by police and on some occasions media equipment could be removed. This is more likely if they have distributed images.

Self-harm

Managing self-harm

All concerns around self-harm must be taken seriously and staff should follow safeguarding procedures and ensure that concerns are reported to the designated safeguarding lead promptly.

Staff can become aware of possible self-harm through a number of ways but most frequently through self-disclosure or peer disclosure.

Staff should also be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. Where a mental health concern is also a safeguarding concern, staff should follow the school's child protection policy and speak to the designated safeguarding lead or a deputy.

Dealing with a disclosure of self-harm

Dealing with a disclosure of self-harm can be difficult and distressing. Some tips on how to respond are below

Use the "do and don't" sections to guide your responses whilst following the steps laid out in the flowcharts below.

Do's and Don'ts

DO

- Get immediate medical support if necessary
- Listen carefully to what you are told.
- Ask appropriate questions to determine level of risk using TED questions (tell, explain, describe)
- Explain to the young person that you will need to share what you have been told.
- Remind the young person that they have done the right thing in sharing and that you are there to support them.
- Stay with the young person if you have immediate concerns for their safety
- Record the disclosure on our electronic reporting tool (CPOMS)
- Consider your own well-being and get support for yourself if distressed / in shock (e.g. staff *Health Shield* support)

DON'T

- Pass judgement on what you are being told.
- Try not to show, shock, distaste or distress.
- Make the child promise not to do it again.
- Promise to keep a secret.
- Promise not to tell the young person's parents.

Managing self-harm | Crisis situation

Member of staff suspects young person has self-harmed and is in need of immediate medical attention

Contact emergency services if injury is life-threatening or if young person is suicidal

If the child / young person is taken to hospital, emergency protocols for treatment and care will be implemented and a CAMHS referral will be activated by the hospital

On young person's return to provision, refer to process for managing recent / historical self-harm

Assess immediate risk

Call for help from Colleague / Emergency Services

Administer First Aid

Keep calm and give reassurance – to the individual young person and to all those who might be affected by witnessing self-harm (adults and young people)

Report and record injury and inform Designated Safeguarding Lead as per procedure

DSL to complete a Children's Services referral form with consent if possible risk for the medium term

Explain confidentiality to workers and young people involved

Still has concerns

DSL refers to Children's social care, following up electronically in writing within 48 hours

Social worker and Manager acknowledge receipt of referral and decide on next course of action within 1 working day

Inform parents / carers unless there is a clear and legitimate reason not to (competency)

Where young person is not taken to hospital, DSL should seek advice and refer to CAMHS where appropriate

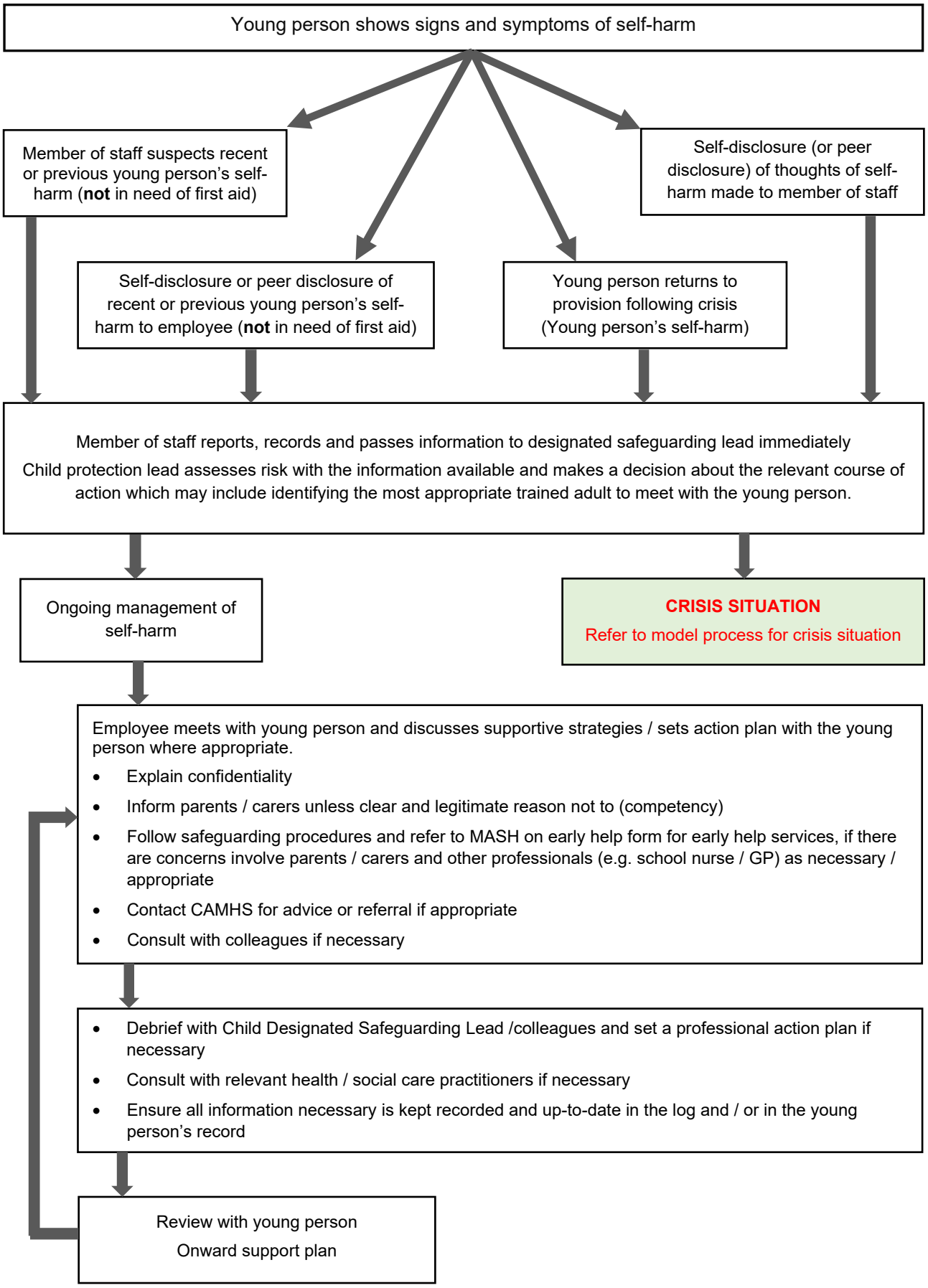
Refer to ongoing management of self-harm

ALWAYS



APPENDIX 8

Managing self-harm | Not in need of urgent medical treatment



Policy on preventing radicalisation

Introduction and scope

Children are susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of our schools safeguarding approach.

All staff are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty, mutual respect, and tolerance of those with different faiths and beliefs.

All pupils and teachers have the right to speak freely and voice their opinions. However, free speech is not an unqualified privilege but is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The Academy provides a safe space in which pupils and staff can understand the risks associated with terrorism and develop knowledge and skills to be able to challenge extremist arguments.

Aims and principles

The main aims of this Policy are to ensure staff are fully engaged in being vigilant about radicalisation; that they overcome professional disbelief that such issues will not happen here and ensure that we work alongside other professional bodies and agencies to ensure that our students are safe from harm.

We recognise that there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism but that there are factors which may indicate concern.

Background factors combined with specific influences such as family and friends may contribute to a child's susceptibility.

Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

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.

The principle objectives are that: -

- All trustees, governors and staff who work with our children and young people will have an understanding of what radicalisation and extremism are and why we need to be vigilant in school and recognise that it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism;

- All trustees, governors and staff who work with our children and young people will know what the school policy is on anti-radicalisation and extremism and will follow the policy when issues arise;

- All parents / carers and students will know that the school has policies in place to keep students safe from harm and that the school regularly reviews its systems to ensure they are appropriate and effective.

Definitions

Extremism

The vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. (For the purposes of this safeguarding policy, this is the definition used in Keeping Children Safe in Education).

Radicalisation

The process of a person legitimising support for, or the use of, terrorist violence

Terrorism

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.

Procedures for referrals

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'.

It is important for us to be constantly vigilant and remain fully informed about the issues which affect the region in which we teach. We remind staff to suspend any professional disbelief that instances of radicalisation '*could not happen here*' and to refer ***any*** concerns to the designated child protection teams See **APPENDIX 1**).

Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately. Concerns should be reported to the designated safeguarding lead (or a deputy), who will consider whether a Prevent referral is appropriate.

The Prevent Duty does not require schools to carry out intrusion into family life but as with any other safeguarding risk the Academy will take action when they observe behaviour of concern.

The Designated Person will seek advice from Children's Services to identify when it is appropriate to make a Prevent referral.
www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

The role of the curriculum

Our curriculum promotes respect, tolerance and diversity. Children are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others.

Our PSHE (Personal, Social and Health Education), Citizenship and SMSC (Spiritual, Moral, Social and Cultural) provision is embedded across the curriculum and underpins the ethos of our school.

We strive to equip our students with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves.

Children are regularly taught about how to stay safe when using the internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek adult help if they are upset or concerned about anything they read or see on the internet.

Staff training

Staff receive annual training to enable them to identify children who may be susceptible to radicalisation and how to respond. This is seen as part of school staff wider safeguarding duties and is similar in nature to protecting children from other harms whether these come from within their family or are the product of outside influences. Members of the Designated Safeguarding Lead team have undertaken Prevent Awareness training and are able to provide advice and support to other members of staff on protecting children from the risks of radicalisation.

Prevent training will also support staff to recognise changes in children's behaviour which may indicate that they may be in need of help or protection and to act proportionately where concerns arise.

Child sexual and criminal exploitation including county lines

Some definitions and terminology

Both Child Criminal Exploitation (CCE) including county lines and Child Sexual Exploitation (CSE) are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity: -

a) in exchange for something the victim needs or wants; *and/or*

b) for the financial or other advantage or increased status of the perpetrator or facilitator; *and/or*

c) through violence or the threat of violence.

Child criminal exploitation does not always involve physical contact and can also occur through the use of technology.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

This may constitute modern slavery. Where a potential victim of CCE or CSE is identified, relevant child protection and modern slavery referral procedures should be followed.

CCE and CSE may be committed or facilitated by an organised network or gang, and the victim may identify as being part of that group. Children can also be exploited by other children who may themselves be experiencing exploitation. Where this is the case, the child who has caused harm should also be recognised as a victim where they are themselves being exploited.

Different forms of harm can overlap, and perpetrators may subject children and young people to multiple forms of abuse, including criminal exploitation (including county lines) and sexual exploitation.

Whilst age may contribute to an imbalance of power, other factors may also make a child more vulnerable to exploitation, including sexual identity, cognitive ability, having a physical or learning disability, being neurodivergent, communication ability, physical strength, status, and access to economic or other resources.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

We recognise that children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, we know that their susceptibility as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced.

We understand that they may still have been criminally exploited even if the activity appears to be something they have agreed or consented to and as such should be recognised as a victim

We further recognise that the experience of girls who are criminally exploited can be very different to that of boys and that the indicators may not be the same. We know that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

We are aware that children may not feel ready or know how to tell someone that they are being exploited, and / or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened.

We also recognise that pupils form susceptible groups are at greater risk of being exploited and accept, any child may be vulnerable to exploitation. Staff will consider the individual circumstances of each child rather than relying on a particular profile or set of characteristics.

County lines

This is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “burner phone” or “deal line”.

Exploitation is an integral part of the county lines offending model with children and susceptible adults exploited to move [and store] 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 schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

We understand that CSE can occur over time or be a one-off occurrence, and may happen without the child’s immediate knowledge e.g. through others sharing videos or images of them on social

media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex.

Staff are aware that children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Our priorities

We recognise the need to make clear our commitment to deal effectively with Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) and county lines. Our academy will ensure that: -

- we identify, and make known to staff and pupils, the designated lead staff who are fully trained in CSE, CCE and County Lines and that they update their training regularly. (This will usually be the same staff named in **APPENDIX 1**)
- all staff are made aware of and understand CSE, CCE and County Lines indicators and referral pathways,
- pupils are taught about CSE, CCE and County Lines and how to protect themselves and each other,
- pupils are taught about healthy (including sexual) relationships, peer pressure, bullying, e-safety, gang activity etc, and how these topics can relate to CSE, CCE and County Lines.
- pupils know who to go to for help and support and to whom they should report concerns
- relevant staff work in partnership with other agencies,
- procedures are in place to continually gather, record and share information with the Enfield Children's Service's the National Referral Mechanism and local services / third sector providers who offer support to victims of County Lines exploitation as soon as practicable, including information on pupils running away or going missing for episodes.

What to look out for

Susceptibilities

ALL children and young people, including those from supportive families can be susceptible to sexual and criminal exploitation. However, some children and young people are known to be at greater risk. For example, those that have: -

- a chaotic home / family life,
- a history of abuse (including familial child sexual abuse, risk of forced marriage, risk of so called 'honour'-based violence, physical abuse, emotional abuse or neglect),
- experienced loss / bereavement,
- associations with gangs through relatives / peers, or are living in a gang neighbourhood,

- friendships with children / young people who are being sexually exploited,
- special educational needs and disabilities,
- a lack of secure accommodation or live in residential care,
- low self-esteem / confidence,
- responsibilities as a 'young carer' (i.e. have caring responsibilities for parents' / family members)

Warning signs

Children and young people who are being sexually / criminally exploited may be: -

- going missing from home or care or regularly coming home late,
- persistently absent from school or do not take part in education,
- increasing their use of social media, dating sites, image sharing apps etc.,
- involved in risky online relationships including new contacts with people out of city,
- sharing inappropriate / indecent online images with peers, or with people only met online,
- becoming isolated / estranged from family and friends,
- meeting people befriended online,
- associating with other young people involved in exploitation
- involved in offending behaviour,
- misusing drugs / alcohol,
- experiencing sexual cyber-bullying,
- changing their physical appearance,
- having older boyfriends or girlfriends,
- experiencing sexually transmitted infections, pregnancy and terminations,
- in poor mental health and / or self-harming, having thoughts of, or attempting, suicide,
- receiving unexplained money and / or gifts from unknown sources.

Online sexual exploitation can include:

- befriending through online chat rooms / messaging services
- online grooming techniques (e.g. stalking, identity pretence, false promises e.g. meeting celebrities, tickets, gifts)
- asking children to take and share indecent images of themselves
- leverage for further demands (e.g. threat to show other people recorded sexual acts by child / young person).
- arranging offline meeting for purpose of sexually abusing child
- contact from perpetrators in other countries, & abused online
- speed of grooming can be very quick - leaving little 'thinking time' (the restrained influencing of a child over several months has been largely replaced by rapid escalation to threats, intimidation and coercion).

Risk assessment and consent

In assessing whether a child or young person is a victim of sexual exploitation, or at risk of becoming a victim, careful consideration should be given to the issue of consent. It is important to bear in mind that:

- sexual activity with a child under 16 is an offence;
- a child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching;
- it is an offence for a person to have a sexual relationship with a 16 or 17 year old if they hold a position of trust or authority in relation to them;
- where sexual activity with a 16 or 17 year-old does not result in an offence being committed, it may still result in harm, or the likelihood of harm being suffered;
- non consensual sex is rape whatever the age of the victim;
- if the victim is incapacitated through drink or drugs, or the victim or their family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed.
- child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18 years and not just those in a specific age group.

What to do next

Any member of staff who suspects or receives information that a child or young person may be involved in sexual or criminal exploitation (including suspicion that they are being groomed online), should refer their concerns to their Designated Safeguarding Team (See **APPENDIX 1**). It is they who will refer the matter to Children's Social Care.

If there are concerns about the involvement of a person who:

- works with children; *and / or*
- is in a position of trust

The Local Authority Designated Officer (LADO) will be informed in line with our *procedures for dealing with allegations of abuse against staff* (Please see **APPENDIX 11**)

Where appropriate, the child or young person's wishes and feelings, as well as those of their parents / carers should be sought and taken into consideration when deciding how to proceed unless to do so would not be in the child or young person's best interest and may put them at further risk of harm.

Some children or young people may have been trafficked and will need support to access services. Practitioners should refer to the current Modern Slavery statutory guidance and National Referral Mechanism (NRM) procedures.

Useful contacts and web links / hyperlinks

Enfield Safeguarding Partnership

https://new.enfield.gov.uk/safeguardingenfield

National Crime Agency | Modern Slavery Human Trafficking Unit (MSHTU)

www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking

The Children's Society | County lines toolkit

www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit

Home office guidance

www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims

Parents against child sexual exploitation

PACE is the leading national charity working with parents / carers of sexually exploited children
http://paceuk.info/

Education from the National Crime Agency

Information about online abuse
www.ceopeducation.co.uk/

Barnardo's

Advice for parents, professionals and young people on the signs of sexual exploitation and how to keep safe.
www.barnardos.org.uk/get-support/support-for-parents-and-carers/child-abuse-and-harm/child-sexual-abuse-and-exploitation

Further information

Child abuse concerns: guide for practitioners

Guidance to help practitioners identify signs of child abuse and neglect and what action to take
www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2

NSPCC (Sexting)

www.nspcc.org.uk/keeping-children-safe/online-safety/sexting-sending-nudes/

Procedures for dealing with allegations of abuse against those working in or on behalf of our academies including low level concerns

Introduction

All academies forming part of North Star Community Trust take the responsibility of caring for children seriously.

We recognise that any possibility that a member of staff, contractor, volunteer or governor / trustee may have hurt a child must not only be investigated thoroughly, but in a way that does not prejudice either the child or the accused individual.

Any investigation of an allegation of abuse against those working in or on behalf of our academies must follow the professional standards and routines described in this policy and will be undertaken in accordance with the guidelines laid out in 'Keeping Children Safe in Education – Statutory guidance for schools and colleges'.

There are two sections to this appendix covering the two levels of concerns and allegations: -

PART A

Concerns / allegations that may meet the harm threshold and referred to the LADO

PART B

Concerns / allegations that do not meet the harm threshold (referred to as 'low-level concerns')

A. Concerns or allegations that may meet the harm threshold

Initial allegation made to the academy

It is our policy that any allegation of abuse made by a member of staff, volunteer or student must be reported immediately to the respective academy's Head teacher (or Head of school) and it is the responsibility of the adult, to whom that disclosure is made, to do so.

This obligation extends to concerns or allegations about anyone working in or on behalf of the academy, including supply teachers, trainee teachers, volunteers or contractors. It also extends to include behaviour that may have happened outside of school that might make an individual unsuitable to work with children. This is known as transferable risk.

If / where appropriate, an assessment of transferable risk to children with whom the person works will be undertaken.

In their absence, the allegation should be reported to an academy Designated Safeguarding Lead (DSL) (See **APPENDIX 1**)

The Head teacher will report the allegation to the Chief Executive Officer and the Trust's Head of Safeguarding without delay and on the same day that the allegation is received wherever possible, should it meet any of the following criteria where any member of staff in the school (including supply teachers, trainee teachers, volunteers and contractors or visiting professionals) has: -

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

If in doubt, the Chief Executive Officer and Head teacher will seek procedural advice from the Trust's Head of Safeguarding and from the local authority.

There are two aspects to consider when an allegation is made: -

1. Looking after the welfare of the child

The designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance. Where a referral is required, the school should follow the local safeguarding partnership's procedures and the requirements of Working together to safeguard children 2026.

2. Investigating and supporting the person subject to the allegation

The academy will nominate a case manager (usually the head teacher but the head teacher may choose to delegate this authority to another senior leader in the Trust). Where an allegation

concerns the Head teacher, the case manager will be appointed in accordance with the Trust's governance arrangements.

The case manager should discuss with the Local Authority Designated Officer (LADO) the nature, content and context of the allegation and agree a course of action.

There may be up to three strands in the consideration of an allegation: -

- a police investigation of a possible criminal offence
- enquiries and assessment by children's social care about whether a child is in need of a protection or in need of services (Social Services).
- consideration by the school of disciplinary action in respect of the individual.

Should the allegation relate to / be made against a Head teacher, this should be brought to the attention of the Chief Executive Officer (CEO) immediately

Should the allegation be made against the Chief Executive Officer (CEO) then this should be brought to the attention of the Chair of the Board of Trustees immediately.

Should the allegation be made against a member of agency staff or a supply teacher we will in no circumstances cease to use a member of staff due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. We will discuss with the supply agency or agencies where the supply teacher is working across a number of schools of colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst investigations are ongoing.

Initial consideration

Before investigating the allegation or discussing the allegation with the staff member in question the Head teacher must discuss the matter with the Local Authority Designated Officer (LADO) to provide any details of the allegation and the circumstances in which it was made in accordance with our legal duty. The Chief Executive Officer should also be informed who will notify the Board of Trustees where appropriate.

We may conduct some basic enquiries to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

A non-exhaustive list of example questions includes: -

- was the individual in the school or college at the time of the allegations?
- did the individual, or could they have, come into contact with the child?
- are there any witnesses? and,
- was there any CCTV footage?

Some rare allegations will be so serious they require immediate intervention by children's social care services and / or police. LADO should be informed of all allegations that come to a school's or college's attention and appear to meet the criteria so they can consult police and children's social care services as appropriate. Where there is any doubt about whether the harm threshold is met, the LADO should be consulted.

The LADO will advise whether or not informing the parent / carers of the child (fully or partially) will impede the investigation. If it is agreed the information can be fully or partially shared, the Head teacher will inform the parent / carer. In the event the child is injured and requires medical treatment the parent / carer may need to be informed straightaway.

The Head teacher will also seek advice from the LADO, the police and / or Local Authority children's social care to agree what information can be disclosed to the person accused. This should be as soon as possible to inform of the nature of the allegation, how the enquiry will be conducted and the possible outcomes (e.g. disciplinary action, and dismissal or referral to the barring lists or regulatory body). If the person is a member of a union or professional association, he / she will be advised to contact that organisation.

At this point, the LADO will identify and make any necessary referrals to external agencies.

If the allegation is about physical contact or there is cause to suspect a child is suffering (or is likely to suffer) significant harm, a strategy discussion involving the police and/or local authority children's social care will be convened in accordance with the statutory guidance Working together to safeguard children 2026. The strategy discussion and initial evaluation with the police will take into account the fact that teachers and other school staff are at liberty to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour (in line with Section *93 of the Education and Inspections Act 2006).*
www.legislation.gov.uk/ukpga/2006/40/contents

Where there are concerns about the welfare of other children in the community or the member of staff's family, these will be discussed with the designated safeguarding lead and make a risk assessment of the situation. It may be necessary for the designated safeguarding lead to make a referral to local authority children's social care.

Action following initial consideration

Where the initial consideration decides that it does not involve a possible criminal offence, the responsibility of dealing with the allegation rests with the Trust. In such cases, and if the nature of the allegation does not require the involvement of external agencies, it will be progressed in accordance with the appropriate internal procedures and following discussion with the LADO.

Where further investigation is required to inform consideration of disciplinary action the Trust will agree who is best placed to undertake that with the LADO. Usually the investigation will be undertaken by a senior member of school staff however where independent investigation is required head teachers will be supported by the Trusts HR team and investigations may be carried out by an independent third party or senior Trust staff from the central team or other academies.

Case subject to police investigation

If the police and / or Crown Prosecution Service (CPS) decide not to charge the individual with an offence, or decide to administer a caution, or the person is acquitted by a Court, the police should wherever possible aim to pass to the Head teacher, all information they have which may be relevant to a disciplinary case. In those circumstances the Head teacher and the LADO should proceed as described above.

Supporting children and families

With the agreement of the LADO and / or Reviewing Officer, parents or carers of a child or children involved will be told of the allegations as soon as possible if they are not already aware. They will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution.

In line with government guidance parents or carers of the child or children involved will be: -

- formally told about the allegation as soon as possible. (we will consult the LADO and where involved children's social care and / or the police on what information can be disclosed);
- kept informed about the progress of the case, only in relation to their child no information can be shared regarding the staff member; *and*
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002 (as inserted by Section 13 of Part 3 of the 2011 amendments)

The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited.

Supporting the subject of the allegation

We recognise our duty of care to our employees. We will do all we can to: -

- manage and minimise the stress caused by the allegation;
- inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary;
- advise the individual to contact their trade union representative, or a colleague for support;
- appoint a named representative to keep the person informed about progress of the case;
- provide access to counselling or medical advice where appropriate.
- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Timescales (monitoring)

It is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. Every effort will be made to manage cases to avoid any unnecessary delay whilst co-operating fully with the relevant agencies.

Reviews will be held regularly; usually fortnightly or monthly depending on the complexity of the case.

Suspension

In some cases, suspension will be considered where there is cause to suspect a child or children are at risk of harm, if the allegation warrants investigation by the police, or is so serious that it might be grounds for dismissal. However, a person will not be suspended automatically, or without careful thought and all other options to avoid suspension will be considered prior to taking that step.

Any suspension will be considered under the terms of our disciplinary policy after a full risk assessment and all practical alternatives such as redeployment we be considered. Decisions will be made after consultation with the LADO who will canvass police / social services views about whether the accused member of staff needs to be suspended from contact with children, so as to inform the school's consideration of suspension. The Head teacher or the Chief Executive Officer will keep the individual informed about developments at school.

Where we are made aware that the Secretary of State has made an interim prohibition order, in respect of an individual we will take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the Teaching Regulation Agency investigation, the individual must not carry out teaching work.

Action on conclusion of a case

In cases where it is decided that a person who has been suspended can return to work subject to any disciplinary action where applicable, the academy will consider how best to facilitate that and we appreciate that most people will benefit from some help and support. Depending on the individual's circumstances, a phased return and / or the provision of a monitor to provide assistance with support may be appropriate. The school will also consider how the person's contact with the child or children who made the allegation can be best managed if they are still attending the school.

If the allegation is substantiated and the person is dismissed or the Trust ceases to use the person's services, or the person resigns or otherwise ceases to provide their services, the Trust will refer to the DBS for consideration of whether inclusion on the barred lists is required where the statutory criteria for referral are met. There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Record keeping

All records will be kept in line with UK GDPR acknowledging the special category data requirements. Recording of all allegations will be kept including those where it is deemed that no further action is required. The following definitions should be used when determining the outcome of allegation investigations: -

- **SUBSTANTIATED** (i.e. there is sufficient evidence to prove the allegation)
- **UNSUBSTANTIATED** (i.e. there is insufficient evidence to either prove or disprove the allegation The term, therefore, does not imply guilt or innocence).
- **FALSE** (i.e. there is sufficient evidence to disprove the allegation)
- **MALICIOUS** (i.e. there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation)
- **UNFOUNDED** (i.e. to reflect cases where this is no evidence or proper basis which supports the allegation being made)

Action in respect of false, malicious or unsubstantiated allegations

If an allegation is found to be false, malicious or unsubstantiated the LADO or school designated safeguarding lead may refer the matter to Children's social services to determine whether the child concerned is in need of services, or may have been abused by someone else.

In the rare event that an allegation is shown to have been deliberately invented or malicious, the Head teacher will consider whether any disciplinary action is appropriate against the pupil who made it, or the police should be asked to consider whether any action might be appropriate against the person responsible if he / she was not a pupil.

Whilst records of allegations and subsequent actions are held securely, details of allegations that are found to have been malicious should be removed from the personnel record of that member of staff and held securely and separately.

Records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Resignation and settlement agreements

Every effort will be made to reach a conclusion in all cases even if: -

- The individual refuses to cooperate, having been given a full opportunity to answer the allegation and make representations.
- It may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete but we shall reach and record an outcome wherever possible.

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. A referral to the DBS must be made, if the criteria for a referral are met and those circumstances it will not be appropriate to reach a settlement / compromise agreement. Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome will be made clear when providing references to prospective employers.

Learning lessons

At the conclusion of a case in which an allegation is substantiated the academy, in conjunction with the LADO, will review the circumstances of the case to determine whether there are any improvements to be made to the school or college's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated.

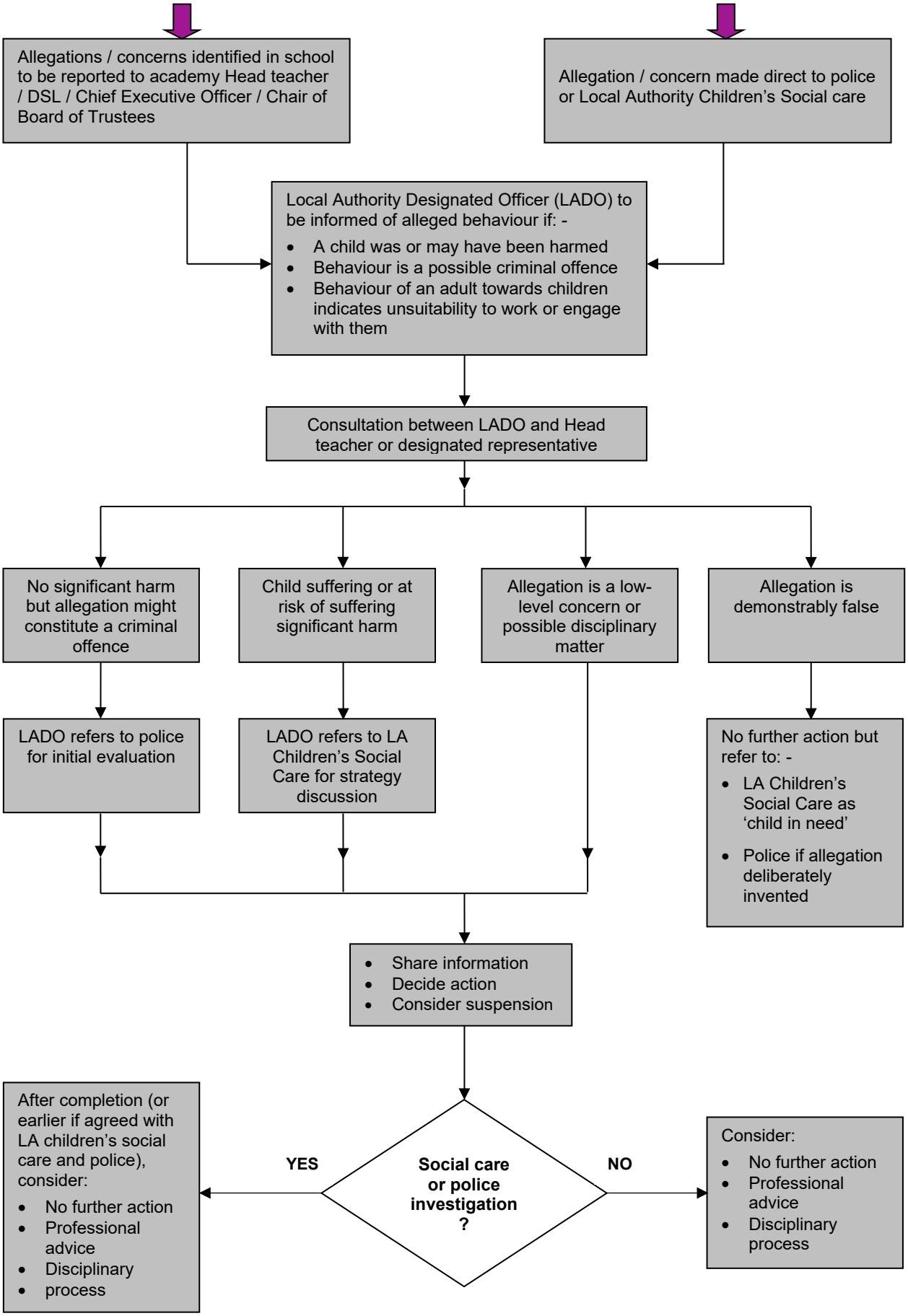
Should an adult make an allegation to our schools that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, will still be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

Allegations against an individual or organisation using the school premises

As per our lettings policy and outlined in APPENDIX 2, we ensure that any organisations or individuals hiring our premises have appropriate safeguarding arrangements in place. Whilst our safeguarding procedures will apply to those attending any activities or services we directly manage (regardless of whether those attendees are known to us) we may consider any concern raised about individuals on our premises in line with our procedures if we feel it is appropriate to do so.

APPENDIX 11

Procedure for dealing with allegations of abuse against staff flow chart



B. Concerns or allegations that do not meet the harm threshold (referred to as 'low level concerns')

As part of our whole school approach to safeguarding, our academies promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately is critical in order to: -

- enable us to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, *and*
- ensure that adults working in or on behalf of our Trust are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – 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 Trust may have acted in a way that: -

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless (or behaviour that may look to be inappropriate, but might not be in specific circumstances) through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Our Safeguarding training emphasises what constitutes a low level concern and the importance of all low-level concerns being shared responsibly with the right person, with the Head teacher, Head

of Safeguarding or CEO who will then respond to ensure that these are recorded and dealt with appropriately. We also encourage staff to feel confident to self-refer where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and / or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Staff can anonymously report 'low level concerns' via the form available on out intranet.

Our approach to responding to low level concerns aims to: -

- ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empower staff to share any low-level safeguarding concerns
- address unprofessional behaviour and supporting the individual to correct it at an early stage
- handle and respond to such concerns sensitively and proportionately when they are raised, *and*
- identify any weakness in the Trust's safeguarding system.

Responding to low-level concerns

The following procedure will be followed for responding to reports of low-level concerns.

If the concern has been raised via a third party, the Head teacher / Head of Safeguarding /CEO will collect as much evidence as possible by speaking: -

- directly to the person who raised the concern, unless it has been raised anonymously, *and*
- to the individual involved and any witnesses.

The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded in writing along with the rationale for their decisions and action taken.

Sharing low-level concerns

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Where there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.

Recording low-level concerns

All low-level concerns should be documented. These records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Low level concerns log

The record should include: -

- details of the concern
- context in which the concern arose,
- outcome / any action taken,
- name(s) of the individual sharing their concerns (if known) unless the individual wishes to remain anonymous which must be respected as far as reasonably possible.

The log will be reviewed by Head teacher, Head of Safeguarding or Chief Executive Officer: -

- to help more easily identify patterns that may involve more than one member of staff.
- so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of behaviour is identified, the Trust will decide on a course of action either: -

- through our disciplinary investigation and / or proceedings; or
- where a pattern of behaviour moves from a concern to meeting the harm threshold a referral to the LADO will be made (as per Part A)

As recurrences of concerns may help build a picture over time, we usually retain such information until the individual leaves our employment.

Consideration will also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and if it is appropriate for policies to be revised, or extra training delivered to minimise the risk of it happening again.

Reference requests

As per Part 3 and Part 4 of Keeping Children Safe in Education 2026, where a reference is sought, we will only provide facts of any substantiated safeguarding concerns / allegations including where a group of low-level concerns about the same individual has subsequently met the harm threshold.

Low-level concerns will not be included in references unless they relate to issues which may normally be included in a reference (for example, misconduct or poor performance).

It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

In line with Paragraph 24(a) of Part 4 in Schedule 2 of the Data Protection Act 2018, employment references given (or to be given) in confidence for the purposes of employment or prospective employment are exempt from the subject access provisions of UK GDPR.

Contact with the police

Sharing personal data of pupils

Our schools have signed a data sharing agreement with the MET Police. This means both we and they have agreed to work collaboratively but it does not mean that either are entitled to information about children without first adhering to the appropriate steps.

Where the police need to request personal data from us

In the absence of a court order or otherwise enabled by Section 47 of the Children Act which would likely allow us to provide it, requests for personal data must be assessed on a case by case basis.

In order for us to assess this request UK GDPR, the Data Protection Act 2018 and the data sharing agreement we have in place, the police must provide us with sufficient information as to why they are asking and for what purpose they require it.

The police may have their own but otherwise a form, which seeks all the information necessary for us to make this assessment, is available for them to complete.

The form is entitled 'Police requests for disclosure of personal data (in the absence of a Court Order or otherwise enabled by Section 47 of the Children Act)' and can be found under the heading 'Data protection policy, privacy notices and related documents' on the policies page of the school website.

Where we need to request personal data from the police

The data sharing agreement requires us to complete a form which details what we are seeking and why we are seeking it. The police will assess any such request and decide whether or not it can be shared in line with the Criminal Justice Act 2003, UK GDPR and the Data Protection Act 2018.

The form is entitled 'Form for when we need to request personal data from the police' and can be found in the 'Safeguarding' section of the '*Policies and procedures*' section on the Trust's Intranet https://northstartrust.sharepoint.com/sites/NSCT-Policies/SitePages/Safeguarding.aspx

Meeting with pupils

As per the Police and Criminal Evidence Act 1984 (PACE), if the Police arrive unannounced, they should always be directed to the Head teacher in the first instance (or Designated Safeguarding Lead, Deputy Designated Safeguarding Lead or Trust's head of Safeguarding in their absence)

If Police are attending school to visit a pupil or group of pupils this is normally pre-arranged and they must be met by the appropriate staff.

Police officers, of any rank, should not be allowed into the school nor allowed to speak with pupils without the Head teacher, DSL, DDSL or Trust's Head of Safeguarding being made aware and one of these people will organise the next steps.

There is a requirement for a child to have an 'Appropriate Adult' in the circumstances specified by PACE and the relevant PACE Code. This includes where a child is arrested and held in police detention or attends a voluntary interview under caution.

The Appropriate Adult may be the parent or guardian, a representative of an organisation responsible for caring for the child, a social worker of a local authority, or another responsible adult who meets the requirements of PACE. An Appropriate Adult must not be a police officer or a person employed by the police. A member of school staff may act as an Appropriate Adult where permitted by PACE. In particular, PACE Code C provides that, in exceptional circumstances, a juvenile may be interviewed at their place of education with the agreement of the principal or their nominee, who may act as the Appropriate Adult if the conditions in the Code are met.

PACE states that: -

- anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child; *and*
- if at any time an officer has any reason to suspect that a person of any age may be vulnerable, the appropriate safeguards under PACE, including the requirement for an Appropriate Adult where applicable, must be considered.

The member of staff present will inform the Police Officer of any vulnerabilities or safeguarding information known by the school, before they speak to a pupil**,** where it is lawful and appropriate to do so.

If, having been informed of the vulnerabilities, the member of staff present does not feel that the Police Officer is acting in accordance with PACE, they should ask to speak with their supervisor or contact 101 to escalate their concerns.

Details should be recorded on the pupil's safeguarding record including details of: -

- who spoke to the pupil (name of officer and badge number)
- who else was present
- date and time
- the reason for the police contact, where known
- any relevant safeguarding concerns arising from the contact

School must always be seen as a safe place for children to attend but there may be reasons why the arrest is required to be made at school. The member of staff should feel confident to discuss this further with a senior police officer before agreeing to this taking place on the school site. If they are unhappy with the rationale, they can object and ask for further consideration to be given to the appropriateness of this.

Useful information

PACE Code C 2023 - GOV.UK

www.gov.uk/government/publications/pace-code-c-2023

When to Call the Police (NPCC Guidance for Schools and Colleges)

www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf

Safeguarding and child protection concern report

Do not delay in reporting your concern. Where you are concerned that a child may be at immediate risk and '*CPOMS*' is not available, contact a member of the Safeguarding Team **immediately** and then submit this form within 24 hours of the initial report

Academy (please tick)			
Enfield Heights ACADEMY ☐	Heron Hall ACADEMY ☐	Kingfisher Hall ACADEMY ☐	Woodpecker Hall ACADEMY ☐

Details

PUPIL'S NAME:		**Date of birth:**	
Class / form:		**Year group:**	

Cause of concern

Your response / actions so far

Date and time of incident or period of time that you have had this concern

Additional information including background, interaction with parents etc.

Body map included?	Please tick either **Yes** ☐ or **No** ☐

Reported by:		Reported to:	
Signature:		Date:	

Body Map

These body maps may be replicated as required.

Only complete the body map if the injuries are clearly visible or shown to you freely.

Please note on the body map any bruising, scars, injuries, red marks etc giving as much detail as possible under the prevailing circumstances as to size, colour and so on.

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