Safeguarding Policy 2026-27

(including Online Safety and Children Missing from Education)

Key Information

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1. Aims

We aim to ensure that appropriate action is taken in a timely manner to safeguard and promote the welfare of children and young people. We will ensure that all staff are aware of their statutory responsibilities with respect to safeguarding and that staff are properly trained in recognising and reporting safeguarding issues.

2. Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026), Working Together to Safeguard Children (2026) and the Non-School Alternative Provision Voluntary National Standards (2025).

This policy is also based on the following legislation:
Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.

The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques.

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.

Statutory guidance on the Prevent duty, which explains schools' duties under the Annex with respect to protecting people from the risk of radicalisation and extremism.

The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Directors should carefully consider how they are supporting children and young people with regard to these characteristics. The Act allows us to take positive action to deal with particular disadvantages affecting children and young people (where we can show it's proportionate). This includes making reasonable adjustments for disabled children and young people.

The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve outcomes. Some children and young people may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying or racial discrimination.

3. Definitions

Children include everyone under the age of 18.

Safeguarding and promoting the welfare of children means:

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

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

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

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

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

The following 3 safeguarding partners are identified in Keeping Children Safe in Education. They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

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

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

4. Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances.

We ensure that all children have the same protection, regardless of any barriers they may face. We give special consideration to children who:

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

5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and visitors at Insight AP. Our policy and procedures also apply to any off-site activities.

5.1 All staff

All staff will:

- Read and understand Part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Sign a declaration on LearnTrek at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents/carers. This includes making parents/carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).
- Provide a safe space for children and young people who are LGBTQ+ to speak out and share their concerns.

All staff will be made aware of:

- Our systems which support safeguarding, including this safeguarding policy, the role and identity of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSL) and the Staff Code of Conduct.
- The family help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.

- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.
- The importance of reassuring victims is that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at the provision and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children.
- That a child and their family may be experiencing multiple needs at the same time.

5.2 The Designated Safeguarding Lead (DSL)

The DSL is a Director of Insight AP. The DSL takes lead responsibility for child protection and wider safeguarding in the provision. This includes online safety and understanding our filtering and monitoring processes on devices and networks to keep safe online.

During term time, the DSL will be available during work hours for staff to discuss any safeguarding concerns. The DSL can be contacted at any time, including out of hours, via email or phone. When the DSL is absent, the Deputy DSLs will act as cover.

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the young person's school DSL or relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service and/or police), and to support staff.
- Have a good understanding of harmful sexual behaviour.
- Have a good understanding of the filtering and monitoring systems and processes which are in place.

The DSL will also:

- Keep the other Directors informed of any issues.
- Liaise with the young person's school, local authority case managers and designated officers for child protection concerns as appropriate.
- Be confident that they know what local specialist support is available to support all children and young people involved in sexual violence and sexual harassment (including victims and alleged perpetrators), and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

5.3 The Directors

The Directors will:

- Ensure that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law.

- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and local multi-agency safeguarding arrangements.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- Ensure that the provision has appropriate filtering and monitoring systems in place and review their effectiveness annually. This includes:
  - Making sure that all staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
  - Reviewing the DfE's filtering and monitoring standards, and discussing with staff and service providers what needs to be done to support the provision in meeting these standards.
- Ensure the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
- Treat online safety as a running and interrelated theme within the provision's approach to safeguarding and related policies.
- Designate the DSL to have lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
- Ensure that this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Seek assurance, where another body is providing services or activities, that the other body has appropriate safeguarding and child protection policies and procedures in place, and inspect them if necessary.
- Make sure that safeguarding requirements are a condition of using the provision's premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The Safeguarding Director will act as the 'case manager' in the event that an allegation of abuse is made against members of staff. The LADO will act as the 'case manager' if an allegation of abuse is made against the DSL.

6. Confidentiality

Members of staff are urged to share any concerns with the DSL or DDSL. Staff are expected to share this information before speaking to parents/carers to seek advice on next steps. When sharing information the following apply:

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

- If a victim asks the provision not to tell anyone about the sexual violence or sexual harassment there's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

If staff are in any doubt about sharing information, they should speak to the DSL, or DDSL.

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7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and should be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have an EHCP)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs, county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing or goes missing from care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as FGM or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody
- Is missing education, persistently absent or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been, permanently excluded from another education provider

Staff, volunteers and visitors must follow the procedures set out below in the event of a safeguarding issue.
Please note – in this and subsequent sections, you should take any references to the DSL to mean any member of staff who is a DSL or DDSL.

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

- If a member of staff believes a child is suffering or likely to suffer from harm or is in immediate danger they should contact the DSL immediately, including outside working hours. Staff will be advised of any action to take. Anyone can make a referral to children's social care at any time if they are unable to contact the DSL or DDSL.
- Contact will be made with Customer First (Suffolk), Children and Families Hub (Essex) or the police, steps will be implemented to manage or eradicate the concern or a decision may be made that no further action is necessary.
- All reports and actions will be recorded on LearnTrek.
- The child's school will be contacted to share the concern and decision.

7.2 If a child makes a disclosure to a member of staff, volunteer or visitor

If a child discloses a safeguarding issue to a member of staff, they should:

- Listen to and believe them.
- Allow them time to talk freely and do not ask leading questions.
- Stay calm and not show shock or upset.
- Tell the child they have done the right thing in telling someone. Do not tell them they should have told someone sooner.
- Explain what will happen next and that the information will be passed on. Do not promise to keep it a secret.
- Write up the conversation as soon as possible in the child's own words. If a member of staff includes their own thoughts, for example on the child's demeanour, then ensure this is noted is an opinion.
- Add this information to LearnTrek and ideally speak to the DSL about the entry.

Bear in mind that some children may:

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

None of this should stop any member of staff, volunteer or visitor from having a 'professional curiosity' and speaking to the DSL if they have concerns about a child.

7.3 Staff who discover that FGM has taken place or a child is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Any member of staff who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth must immediately report this to the police, personally. This is a mandatory statutory duty, and education staff will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a young person under 18 must speak to the DSL.

The duty mentioned above does not apply in cases where a child is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine children. Any member of staff who suspects a child is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow local safeguarding procedures.

7.4 Staff, volunteers or visitors who have concerns about a child's wellbeing, family or any other concern

Any concerns by staff, however low-level they may appear, should be entered onto LearnTrek. Staff are also encouraged to speak to the DSL or DDSL about their concerns to ensure they are supported. Volunteers or visitors should speak to the DSL, or DDSL, to share their concerns, which will then be added to LearnTrek by the receiving member of staff.

Family help assessment

If an family help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an family help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review alongside multi-agency professionals, and consideration given to a referral to local authority children's social care if the situation does not seem to be improving or is getting worse. We ensure we work closely with safeguarding professionals in terms of sharing information, identifying and understanding risks of harm and ensuring children and families receive timely support.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral. This may involve an initial consultation with the Multi-Agency Safeguarding Hub Professionals Line (0345 606 1499) The local authority will decide within one working day of a referral about what course of action to take and inform the referrer of the outcome. The DSL will make contact with the local authority if this information is not made available and ensure outcomes are properly recorded. If the child's situation does not seem to be improving after the referral, the DSL will follow local escalation procedures to ensure their concerns have been addressed and that the young person's situation improves.

7.5 If a member of staff has concerns about extremism

If a child is likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. The DfE also has a telephone helpline (020 7340 7264) and website (https://report-extremism.education.gov.uk) where staff can raise concerns about extremism with respect to a child.

In an emergency, staff should call 999 or the national anti-terrorist hotline on 0800 789 321 if they believe:

- someone is in immediate danger
- someone may be planning to travel to join an extremist group
- they have seen or heard something that may be terrorist-related

7.6 If a member of staff has a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If a member of staff has a mental health concern about a child they should record this on LearnTrek and speak to the DSL to agree a course of action, being mindful that this could become a safeguarding concern.

7.7 Concerns about a staff member, volunteer or visitor

If you have concerns about a member of staff (including a volunteer or visitor), or an allegation is made about a member of staff (including a volunteer or contractor) posing a risk of harm to children, speak to the DSL, who is also a Director, as soon as possible.

If the concerns/allegations are about the DSL, speak to the local authority designated officer (LADO). Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a volunteer or contractor) to the Director, report it directly to the local authority designated officer (LADO).

Refer to Allegations Against Staff Procedures for further information.

7.8 Allegations of abuse made against other children

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

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of children hurting other children will be dealt with under our provision’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious and potentially a criminal offence
- Could put children at risk
- Is violent
- Involves children being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and seminudes)

See Appendix 1 for more information about child-on-child abuse.

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

If a child makes an allegation of abuse against another child:

- Record the allegation on LearnTrek and tell the DSL, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards females and initiation or hazing type violence with respect to males.
- Ensure our curriculum helps to educate children about appropriate behaviour and consent.
- Ensure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment .
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
  - That even if there are no reports of child-on-child abuse in the provision, it does not mean it is not happening – staff should maintain an attitude of "it could happen here".
  - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report.

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

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't, in itself, prevent us from coming to our own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

7.9 Sharing of nudes and semi-nudes ('sexting')

Staff responsibilities

If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), it must be reported to the DSL immediately and recorded on LearnTrek.

The member of staff must not:

- View, copy, print, share, store or save the imagery themselves, or ask a child to share or download it (if the member of staff has already viewed the imagery by accident, they must report this to the DSL).
- Delete the imagery or ask the child to delete it.
- Ask the child who is involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the child it involves or their, or other, parents/carers.
- Say or do anything to blame or shame any children involved.
- Explain that you need to report the incident and reassure the child that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to children.

- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the child (in most cases, images or videos should not be viewed).
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Relevant facts about the children involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents/carers of the children involved (in most cases parents/carers should be involved).

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEND).
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the child's developmental stage, or are violent.
- The imagery involves sexual acts and any child in the images or videos is under 13.
- The DSL has reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the child is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the children involved (if appropriate).

If at any point in the process there is a concern that a child has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling Suffolk/Essex police on 999 (Emergency) 101 (Non-Emergency) or 01473 613500 (Suffolk), 01245 491491 (Essex).

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on LearnTrek.

Curriculum coverage
Children will be taught about the issues surrounding the sharing of nudes and semi-nudes as part of Life Skills+ lessons and through day-to-day reinforcement of acceptable online behaviours. The following issues in relation to the sharing of nudes and semi-nudes will be covered:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Children will also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

7.10 Reporting systems for children

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
We recognise the importance of ensuring children feel safe and comfortable to come forward and report any concerns and/or allegations.
To achieve this, we will:

- Put systems in place for children to confidently report abuse, including a named key worker, electronic communication options and regular 1:1 times
- Ensure our reporting systems are well promoted, easily understood and easily accessible for children
- Make it clear to children that their concerns will be taken seriously, and that they can safely express their views
- Encourage children to talk to a member of staff that they trust and feel comfortable with
- Explain that information will be recorded on LearnTrek and provide reassurance following a disclosure.

8. Online safety and the use of mobile technology

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

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of children and all staff
- Protect and educate the whole community in its safe and responsible use of technology, including mobile and smart technology (including mobile phones)
- Set clear guidelines for the use of mobile phones for the whole community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

Mobile phones
All children should place their personal belongings, including their mobile phone, in their entrance cupboard so they do not have access to their mobile phone throughout the day including during sessions and the times between sessions. The provision is mindful of the

individual needs of the children who attend and so if access to their phone is part of a supportive intervention then this will be noted on their Personalised Plan.

The 4 key categories of risk
Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying;
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

To meet our aims and address the risks above, we will educate children about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones for their own use, but will limit usage
    - Staff will not take pictures or recordings of children on their personal phones or cameras
- Make all children, parents/carers, staff and volunteers aware that they are expected to sign an agreement regarding the acceptable use of the internet, use of the provision's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a child is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, children and parents/carers are aware that staff have the power to search children's phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk
- Ensure that any remote learning sessions:

  - Take place on a platform recognised by the provision
  - Are organised to provide access to the session by an additional member of staff
  - Are part of the child's Personalised Plan and have been agreed with the parent/carer as part of their offer
  - If remote learning is organised as a response to an emergency situation, this will be noted on the Personalised Plan at the next review.
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

The Online Safety Lead will ensure that, alongside regular reviews, an annual review is undertaken of the approach to online safety, including the filtering and monitoring provision. This will be supported by an annual risk assessment that considers and reflects the risks faced by children when online and in the context of evolving cyber-crime technologies.

9. Notifying parents/carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the Local Authority children's social care team before doing so.
In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved and when this information is shared. We will work with the police and/or Local Authority children's social care to make sure our approach sharing information is consistent.

Depending on the individual circumstances, the DSL will, along with any relevant agencies:

- Meet with the victim's parents/carers, with the victim, to discuss what is being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents/carers to discuss support for them, and what is being put in place that will impact them, e.g. the reason(s) behind any decision(s).

10. Children with special educational needs, disabilities or health issues

We recognise that children with SEND or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers.
Additional barriers can exist when recognising abuse and neglect in this group, including:

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

Staff have a clear understanding of each young person's SEND needs by drawing on information from EHCPs, parental and young person views, previous school reports and multi-agency professionals. This helps us establish what is typical for the child and what may

be new, emerging or concerning. We provide enhanced pastoral support which includes an allocated keyworker, tailored communication support as outlined in the young person's Personalised Plan and individual risk assessments where appropriate. The SENCo oversees this provision to ensure that safeguarding considerations are fully integrated into each young person's Plan.

Any abuse involving children with SEND will require close liaison with the DSL (or Deputy) and the SENCo.

11. Children who are questioning their gender

Sometimes young children also go through a period of questioning their gender but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

Staff should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

We will openly discuss issues relating to gender-questioning with young people. We will not initiate any action in this area but will respond sensitively to a child or their parent raising a request relating to social transition.

When considering a child's request for support with social transition we will consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes.

When considering any request for support with social transition, we will ensure that parents/carers are fully involved and the decision-making process is documented and records are kept.

There are vulnerabilities for children who have fully socially transitioned from an early age and may be living in stealth (that is, friends and staff may be unaware of their biological sex). The Cass Review emphasised that these children are likely to approach puberty in a fearful and anxious state. We will be mindful of this and involve the DSL in these cases.

There may be circumstances where a child wants to fully or partially reverse a social transition request that has previously been agreed. We will maintain flexibility and keep options open for children who have socially transitioned and provide support to children who wish to de-transition, working closely with parents/carers.

12. Children with a social worker

Children may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a child has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the child's safety, welfare and educational outcomes.

For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of additional pastoral and/or academic support

13. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Staff have relevant information about each child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

14. Children missing from education

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

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation and to help prevent the risks of going missing in future. This includes attempts to contact parents/carers on a daily basis, informing the local authority and adhering to requirements with respect to sharing information with the local authority, when applicable, if removing a child's name from the admission register at non-standard transition points.

We will report a child as 'missing in education' to the Local Authority if they are absent from our provision for 10 days or more. Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage. If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

15. Whistle-blowing

Please see the Insight AP – Whistleblowing Policy

16. Record keeping

We will hold records in line with the DfE document retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, will be recorded on LearnTrek.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the provision. If a child for whom the provision has, or has had, safeguarding concerns moves elsewhere, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new placement to have support in place, this should be within:

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving establishment and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Records are held electronically and, where appropriate, in a dedicated, locked filing cabinet.

Records are held on the secure safeguarding platform LearnTrek which is password protected. All Records are only accessible to those with secure access.

Records are archived and kept for 25 years.

Redacted files can be created and shared securely with other professionals when necessary.

17. Training

16.1 All staff

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

This training will be regularly updated and will be integrated as part of the whole-provision safeguarding approach, wider staff training and curriculum planning. It will include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.

Training will have regard to the expectation that all staff:

- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all children

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually. Volunteers will receive appropriate training, as applicable.

16.2 The DSL and DDSL

The DSL and DDSLs will undertake child protection and safeguarding training at least every 2 years.
In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

16.3 Directors

The Directors will receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated.

This is to make sure that they:
Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
Can be assured that safeguarding policies and procedures are effective and support the provision to deliver a robust approach to safeguarding
As the Director may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Senior Manager/DSL, they receive training in managing allegations for this purpose.

16.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the provision will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See Safer Recruitment Policy for further details.

Appendix 1 – Signs and Symptoms of Abuse

Indicators of abuse and neglect are as follows:

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

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the policy and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol abuse, deliberately missing education, serious violence (including that linked to county lines) and consensual and nonconsensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Other safeguarding issues staff should be aware of include:

Child-on-child abuse
All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of any educational space and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. All staff should understand that even if there are no existing reports it does not mean it is not happening, it may be the case that it is

just not being reported. As such, it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL (or DDSL). It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nude and semi-nude images and or videos (also known as sexting or youth produced sexual imagery)
- up-skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (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)

All staff should be clear about this policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

<u>Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)</u>

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. 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.

<u>Child Criminal Exploitation (CCE)</u>

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. 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, their vulnerability 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. They may still have been criminally exploited even if the activity appears to be something they have agreed or

consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact and it may include non-contact 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. 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. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development and ability to learn.

Female Genital Mutilation (FGM)

Whilst all staff should speak to the DSL (or DDSL) with regard to any concerns about FGM, there is a specific legal duty on teachers[1]. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Harmful Sexual Behaviour

HSB can occur between two or more children of any age and sex, from primary through to secondary stage and into post-16 provision. It can occur also through a group of children towards a single child or towards another group of children. HSB may escalate into sexual harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable. Children who are victims of HSB, sexual harassment or sexual violence wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same provision. Whilst any report of HSB, sexual harassment or sexual violence should be taken seriously, staff should be aware it is more likely girls will be the victims of sexual harassment and sexual violence and more likely it will be perpetrated by boys. Children with disabilities are also three times more likely to be abused than their peers.

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

[1] Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, 'teacher' means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England)

Mental Health
All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff can access a range of advice to help them identify children in need of extra mental health support, which includes working with external agencies. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a DDSL.

Serious violence
All staff should be aware of the indicators which may signal that children are at risk from, or involved with, serious violent crime. These may include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm, a significant change in wellbeing, signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Sexual Harrassment
Sexual harassment refers to ‘unwanted conduct of a sexual nature’ which can occur both online and offline and inside and outside of the provision. In this context it specifically relates to child-on-child sexual harassment. Such behaviour can violate a child’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive or sexualised environment.

Sexual Violence
Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003. This includes rape, assault by penetration, sexual assault, causing someone to engage in sexual activity without consent. Consent is about having the freedom and capacity to choose a child, being aware that anyone under the age of 13 can never consent to any sexual activity, the age of consent is 16 and sexual intercourse without consent is rape.

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL/DDSL. The DSL should assess the risk to both the individual and others, considering wider information or concerns, and take appropriate action.