Child Protection and Safeguarding Policy

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Statement of intent

Lingfield Education Trust is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of school premises. We implement a whole-trust preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the governing boards, the headteacher and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the headteacher and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

Key Contacts Regarding Safeguarding

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Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.

DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
FGM	Female genital mutilation	All procedures involving the 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.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.

KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.

SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

Definitions

The terms **"children"** and **"child"** refer to anyone under the age of 18.

For the purposes of this policy, **"safeguarding and protecting the welfare of children"** is defined as:

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

For the purposes of this policy, **"consent"** is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, **"sexual violence"** refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **"sexual harassment"** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:

- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Sharing unwanted explicit content.
- Upskirting.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation, coercion, and threats.

For the purposes of this policy, **"upskirting"** refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, **"making or sharing of nude or semi-nude images and/or videos"** refers to the creation, possession or sharing of nude or semi-nude images and/or videos involving anyone under the age of 18. This includes consensual and non-consensual sharing, AI-generated content where it depicts a child, and content shared online or offline.

"Deepfakes" and **"deepnudes"** refer to digitally manipulated or AI-generated images, audio or videos that falsely depict a person. Where these involve nude or semi-nude images of a child, they will be managed in accordance with the school's procedures for responding to the making or sharing of nude or semi-nude images and/or videos.

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, **"physical abuse"** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, **"emotional abuse"** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, 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 the child to frequently 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, but it may also occur alone.

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-

penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Children's Wellbeing and Schools Act 2026

Statutory guidance

- Home Office 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE 'Working Together to Safeguard Children'
- DfE 'Disqualification under the Childcare Act'
- DfE 'Keeping children safe in education'
- DfE 'Working together to improve school attendance'
- HM Government 'Multi-agency statutory guidance on female genital mutilation'
- HM Government 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE 'What to do if you're worried a child is being abused'
- DfE 'Child sexual exploitation'
- DfE 'Filtering and monitoring standards for schools and colleges'
- DfE 'Information sharing'
- DfE 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE 'Teachers' Standards'
- DfE 'Recruit teachers from overseas'

- DfE ‘Meeting digital and technology standards in schools and colleges’
- Department of Health and Social Care ‘Virginity testing and hymenoplasty: multi-agency guidance’
- DfE ‘Restrictive interventions, including the use of reasonable force, in schools’

This policy operates in conjunction with the following school policies and documents:

- Children Missing from Education Policy
- Prevent Duty Policy
- Child-on-child Abuse Policy
- School Anti-bullying Policy
- Suspension and Exclusion Policy
- Online Safety Policy, including staff and pupil AUPs
- Safe Use of AI Policy
- Cyber-security Policy
- Mobile Devices Policy
- Data Protection Policy
- Photography and Images Policy
- Records Management Policy
- LAC Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- School Behaviour Policy
- Low-level Safeguarding Concerns Policy
- Staff Disqualification Declaration Form
- Reporting Safeguarding Concerns Flowchart

2. Roles and responsibilities

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of ‘it could happen here’ where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Read and understand at least ‘Part one’ of KCSIE.
- Be aware of the school’s systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the school's arrangements for community-based early help and targeted family help and understand their role in identifying pupils who may benefit from support before statutory intervention.

- Be aware of local safeguarding partnership arrangements and understand the referral pathways to CSCS.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Promote dialogue and understanding, and ensure all pupils feel listened to and understood.
- Empower pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes and challenge it in a professional way if it occurs.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that, including technology-facilitated abuse, can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.
- Receive, read and respond to the monthly Trust Safeguarding Briefings

In addition, teachers, including the headteacher, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

The governing boards (see scheme of delegation for distributed roles) have a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that all staff read at least Part one of KCSIE.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place that enable children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback.

- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Have overall strategic responsibility for filtering and monitoring, seek assurance that the filtering and monitoring standards for schools are being met, and that the effectiveness of filtering and monitoring systems is reviewed at least annually, including that appropriate checks are undertaken on all internet-connected devices and a record of those checks is maintained.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Confirm that there are procedures in place to make referrals to the DBS, Teaching Regulation Agency (TRA) and other relevant bodies where required.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Ensure that the school has effective arrangements in place for community-based early help and targeted family help, and that staff understand their role in identifying pupils who may benefit from support before statutory intervention.
- Appoint a designated teacher within each school to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the pupil premium funding can best be used to support LAC.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements, the Data (Use and Access) Act 2025 and the local multi-agency safeguarding arrangements.
- Ensure that appropriate arrangements are in place to keep children safe where school facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding

and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks.
- Ensure that safeguarding requirements are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.
- Ensure that appropriate arrangements are in place to provide effective DSL cover during school hours so that safeguarding concerns can always be responded to promptly.
- Establish robust health and safety and emergency evacuation procedures.

The headteacher has a duty to:

- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Ensure that appropriate filtering and monitoring systems are implemented and that staff understand their roles and responsibilities in relation to filtering and monitoring.
- Provide staff with the appropriate policies and information upon induction.
- Ensure that the school practises safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in Keeping Children Safe in Education and the Education (Independent School Standards) (England) Regulations 2014 as amended.
- Ensure that the school carries out all necessary checks on the suitability of people who serve as members and/or on the governing board.
- Ensure that, where the school ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS within one month.
- Ensuring that appropriate contact with pupils does not prevent staff members from using reasonable force and other restrictive interventions.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place,
- Coordinating the school's approach to community-based early help and targeted family help.
- Provide advice and support to other staff on child welfare, safeguarding 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, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns, including availability via phone, videocall, or other media as an acceptable substitution for in-person availability if an in-school deputy DSL is not available.
- Refer cases:
    - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
    - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
    - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
    - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a point of contact with the safeguarding partners.
- Liaise with the headteacher (if not the headteacher) to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically, including through community-based early help, family help and statutory services where appropriate.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- 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 their attendance, engagement and achievement at school. This includes:
    - Ensuring that the school knows which pupils have or had a social worker.
    - Understanding the academic progress and attainment of these pupils.
    - Maintaining a culture of high aspirations for these pupils.
    - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
    - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the governing board to ensure the Trust Child Protection and Safeguarding Policy and Strategic Safeguarding Framework are effectively implemented.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least every two years, in line with the expectations set out in the Trust Strategic Safeguarding Framework.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act 2025.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

The school will ensure that appropriate arrangements are in place to provide effective DSL cover during school hours. Safeguarding information will be shared securely where necessary to ensure continuity of safeguarding arrangements and timely responses to concerns.

The designated teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

3. Multi-agency working

The Trust and it's schools contribute to multi-agency working as part of its statutory duty. The Trust is aware of and will follow the local safeguarding arrangements in each of its 7 local authority areas.

Each school will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

All schools will work collaboratively with families and partner agencies to safeguard and promote pupils' welfare, through community-based early help and targeted family help, and by contributing to coordinated multi-agency plans to support children and families.

Where a child may benefit from family help, the school will work with partner agencies and contribute to multi-agency assessments and plans.

The school will allow CSCS from the host LA and, where appropriate, the placing LA, access to pupils to enable them to undertake or consider assessments under sections 17 or 47 of the Children Act 1989.

The school will also be mindful of the importance of inter-agency working in identifying and preventing CSE, CCE and other forms of extra-familial harm.

The Trust and its schools will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspective to evaluate provision.
- Prioritising and sharing resources depending on pupils' needs.
- Understanding its role within the local safeguarding arrangements.
- Mutually and constructively challenging other's assumptions in a respectful manner.
- Information sharing

The Trust recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for community-based early help or family help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will be made aware that there may be legal or statutory requirements to share information for safeguarding purposes when requested by relevant agencies.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

Where decisions are made about sharing or withholding information, these will be based on consideration of the risks to the pupil and, where appropriate, the rationale for decisions will be recorded.

4. Support before statutory intervention

Support before statutory intervention means providing help as soon as a problem emerges, at any point in a child's life. This may include support from universal services, community-based early help, or targeted family help, depending on the child's level of need.

Any pupil may benefit from support before statutory intervention; however, staff will be particularly alert to the potential need for community-based early help or family help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have a mental health need.
- Are young carers.
- Are pregnant or are a parent themselves.
- Have exhibited early signs of abusive, violent or harmful behaviours.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Have been repeatedly removed from the classroom.
- Have experienced multiple suspensions.
- Are on a part-time timetable.
- Are at risk of being permanently excluded or are in alternative provision or a pupil referral unit.
- Are at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation.
- Are at risk of being radicalised into terrorism.
- Have family members in custody or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of honour or faith-based abuse, such as FGM or forced marriage.
- Are privately fostered.

The Trust and it’s schools will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from community-based early help or family help.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where family help or community-based early help is appropriate. This includes liaising with other agencies and arranging a multi-agency family help assessment where appropriate, following local safeguarding partnership procedures.

Staff may be required to support other agencies and professionals during a community-based early help or family help assessment and, in some circumstances, may act as the Lead Practitioner, where appropriate and in accordance with local arrangements. All cases will be reviewed regularly and consideration given to referral to CSCS where the child's circumstances do not improve or where the level of risk increases.

Staff will be familiar with the local thresholds for community-based early help, family help, Section 17 (Children in Need) and Section 47 (Child Protection) and will follow local safeguarding partnership procedures when making referrals.

5. Abuse, neglect and exploitation

All staff will be aware of the indicators of abuse, neglect, exploitation and modern slavery and will understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

The school will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. The school will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

The school will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all pupils.

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. Staff will understand that, in most cases, multiple issues will overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of harms outside their families (extra-familial harms).

These harms include, but are not limited to:

- Sexual abuse, including harassment and exploitation.
- Domestic abuse in their own intimate relationships, including physical, sexual, emotional abuse, and stalking.
- Criminal exploitation, including financial exploitation.
- Serious youth violence.
- County lines.
- Radicalisation.

All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues and that risks such as abuse can take place online as well as face to face.

Staff will also understand that child-on-child abuse can occur online and can take the form of:

- Abusive, harassing, misogynistic or misandrist messages.
- The non-consensual making or sharing of nudes or semi-nudes, particularly within group chats.
- Sharing of abusive images and pornography to those who do not wish to receive such content.

Staff will always speak to the DSL or deputy if they are unsure about something in relation to abuse, neglect or exploitation.

6. Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

Appendix A of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues. These are also detailed in Part 1 of KCSIE which all staff are required to read annually, the Trust Safeguarding Key of Knowledge, Trust Safeguarding Monthly Briefings and as part of the suite of online training which all staff must undertake each year.

7. Child-on-child abuse, including sexual harassment and sexual violence

For the purposes of this policy, **"child-on-child abuse"** is defined as abuse between children.

The Trust has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent and within the detailed Trust Child-on-Child Abuse Policy.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up". Staff will understand that recognising behaviours early and putting in place timely, evidence-based support can be vital in preventing child-on-child abuse.

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

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Serious physical assault and harm, or threat of harm with a weapon – 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 harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual making or sharing of nudes and semi-nudes.
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their private areas to obtain sexual gratification.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group – this may also include an online element.

Some children may be particularly vulnerable to child-on-child abuse. The school recognises that children with SEND or certain medical or physical health conditions may face additional safeguarding challenges and may be more vulnerable to abuse, bullying and prejudice-based bullying. Staff will recognise that children with disabilities are three times more likely to be abused than their peers and will consider whether additional pastoral or safeguarding support is required.

All pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability. The school will give special consideration to, amongst others, children who:

- Have SEND.
- Are vulnerable to being bullied.
- Are looked after or living in unsupportive home situations.

The DSL will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to the Trust policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The Trust procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-bullying Policy and Trust Suspension and Exclusion Policy, where relevant.

The school recognises that harmful behaviours exist on a continuum and will respond proportionately, considering the age, developmental stage, intent, frequency and seriousness of the behaviour, as well as the needs of all children involved.

8. Online safety and technology

Each school will adhere to the Trust Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

Staff training in online safety will cover the four categories of risk as outlined in KCSIE:

- **Content** - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation, and conspiracy theories.
- **Contact** - Training will address the risks of harmful online interaction with other users or generative AI applications that simulate this. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.
- **Conduct** - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as making, sending, or receiving explicit images, including those generated using AI and instances of online bullying.
- **Commerce** - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams.

Any concerns that pupils or staff may be at risk will be reported promptly to the Trust IT Manager or through appropriate safeguarding channels.

The Trust will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the Trust Cyber-security Policy. The appropriateness of the school's filters and monitoring systems will be informed by the 'Filtering and monitoring standards', the 'Cyber security standards for schools and colleges', and the risk assessment required by the Prevent Duty. The Trust will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. Each school will also ensure that it meets the filtering and monitoring standards published by the DfE through the co-completion with the Trust IT Manager of an annual e-safety audit.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

Communicating with parents
As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor internet use.

The school will also make it clear to parents what their children are being asked to do online for school.

Reviewing online safety
The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils. This is co-completed with the Trust IT Manager.

The school and Trust will also review the effectiveness of its filtering and monitoring systems at least annually. This review will be led by the member of the SLT responsible for filtering and monitoring, with support from the DSL and ICT support where appropriate. The review will include checks that filtering and monitoring systems are operating effectively on all internet-connected devices in relevant locations, and a written record of the review will be maintained.

Mobile Devices Policy
The school will ensure that pupils do not have access to mobile phones throughout the school day, including during lessons, the time between lessons, breaktimes and lunchtime, except where an exemption applies. The school's approach to mobile phones and smart technology will be set out in the Mobile Devices Policy and will take account of the safeguarding risks associated with pupils having unlimited and unrestricted access to the internet via mobile networks.

Photography and images
Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography and Images Policy.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

9. Making or sharing of nudes or semi-nudes

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nudes and semi-nudes as a safeguarding concern, including where these images are generated by AI.

Staff will receive appropriate guidance regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour. This is fully detailed within he Trust Child-on-Child Abuse Policy.

Staff will be aware that making or sharing imagery depicting nudes or semi-nudes of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. The DSL will work to support the affected pupils and inform them of the reporting routes to remove a nude or semi-nude that has been shared online or to prevent an image from being shared online.

The school's full response to incidents of consensual and non-consensual making or sharing nudes or semi nudes can be found in the Trust Child-on-Child Abuse Policy.

10. Appropriate physical contact with pupils

The Trust will not operate a 'no contact' policy in any of its schools. The school will also not agree to any request from parents or staff that would prevent the use of reasonable force and other restrictive interventions where these may be necessary and lawful. A 'no contact' approach could leave staff unable to intervene appropriately to safeguard pupils and others.

Physical intervention and reasonable force may be used in limited circumstances and will be managed in line with the Trust Restrictive Physical Intervention Policy.

The school will adopt sensible policies and practices which will allow and support staff to make appropriate physical contact with pupils where this is necessary, proportionate and in the best interests of the child. There will be circumstances in which physical contact will be appropriate and will not give rise to concerns about the use of reasonable force or restrictive interventions.

Examples of circumstances where physical contact will generally be appropriate include:

- Providing first aid.
- Guiding or escorting pupils, e.g. holding the hand of a younger pupil when moving around the school or on a school trip, supporting a pupil to move to a space they have chosen to access in order to self-regulate, or assisting pupils to move safely.
- Comforting a distressed pupil.
- Congratulating or praising a pupil, e.g. a handshake or a brief pat on the back.
- Demonstrating how to use a musical instrument.
- Demonstrating exercises or techniques during PE lessons or sports coaching.

When deciding whether physical contact will be appropriate in a particular situation, staff will use their professional judgement and will have regard to:

- This policy and the Trust Restrictive Physical Intervention Policy.
- The context and circumstances, including whether other adults are present.
- The individual pupil's age and level of understanding.
- Any other relevant factors, including, but not limited to:
    - Whether the pupil has SEND or other vulnerabilities.
    - Whether alternative strategies that do not involve physical contact could be used.

11. Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

12. Pupils potentially at greater risk of harm

The Trust and its schools recognise that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining

abuse, neglect and exploitation. The school will ensure that safeguarding concerns involving these pupils are responded to appropriately, taking account of their individual needs and circumstances.

Pupils who need social workers
Pupils may need social workers due to abuse, neglect, exploitation or complex family circumstances. Their experiences of adversity and trauma may leave them vulnerable to further harm and educational disadvantage, including barriers to attendance, learning, behaviour and mental health.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Children who are absent from education
The Trust and school recognises that pupils who are absent from education for prolonged periods and/or on repeated occasions may be at increased risk of abuse, neglect, CCE and CSE, including county lines.

The school will respond to concerns relating to attendance in accordance with its Attendance and Absence Policy and Children Missing Education Policy, and will work with CSCS and other agencies where absence gives rise to safeguarding concerns.

Home-educated children
Whilst many home educated children receive suitable education, the school recognises that elective home education (EHE) can mean that children are less visible to the services needed to safeguard and support them.

In line with the School Attendance (Pupil Registration) (England) Regulations 2024, the school will inform the LA of all deletions from the admissions register when a pupil is removed from the school roll.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Pupils requiring mental health support
The Trust and school recognises that mental health problems can, in some cases, develop into safeguarding concerns. This may include self-harm, signs of an eating disorder, suicidal ideation or suicide, or indicate that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Only appropriately trained professionals will make a diagnosis of a mental health condition; however, all staff will play an important role in promoting positive mental wellbeing, identifying pupils who may require support, ensuring there is early intervention and the referral concerns where appropriate.

Where support is required, the DSL or deputy will consider whether parents should be informed where doing so will not place the pupil at additional risk. Where safeguarding concerns are linked to a pupil's mental health or emotional wellbeing, the DSL or deputy will liaise with the school's senior mental health lead to ensure the pupil receives coordinated support.

The school will maintain a whole-school approach to promoting positive mental health and wellbeing and will make use of appropriate internal and external support services where required.

LAC and PLAC
Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The governing board will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in the school's LAC Policy.

Young carers
The Trust recognises that caring responsibilities may have a significant impact on a pupil's attendance, attainment, behaviour and wellbeing. As such, Trustees aim for all schools within the Trust to gain the Young Carers In Schools accreditation during 2026, to ensure best practise and highlight this important and vulnerable group of children. This work is underpinned by the Trust 'Young Carers: Our Supportive Approach' guidance.

The school will seek to identify young carers at the earliest opportunity and will work with pupils, families and external agencies to ensure that appropriate support is provided in line with the Trust outlined requirements.

Pupils with SEND
When managing safeguarding in relation to pupils with SEND, staff will be aware that:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability.
- Pupils with SEND can be disproportionally impacted by issues such as peer isolation, bullying, and prejudice-based bullying without outwardly showing any signs.
- Communication barriers may make it more difficult for pupils to recognise, disclose or report abuse.
- Pupils with SEND may not always recognise that what is happening to them is abuse.
- Pupils requiring intimate care or who are more isolated from others may be at increased risk.
- Pupils may be more dependent on adults for care.
- Pupils may have difficulty understanding the difference between fact and fiction online or understanding the consequences of their online behaviour.

When responding to safeguarding concerns involving pupils with SEND, the DSL will liaise with the SENCO and, where appropriate, parents and external agencies to ensure that the pupil receives appropriate support.

The school will also consider whether additional pastoral support or communication support is required.

Pupils with medical conditions
The Trust and school recognises that pupils with medical conditions or allergies may require additional safeguarding consideration.

A safeguarding referral will not be made solely because of an incident relating to the management of a pupil's medical condition; however, where concerns indicate that a pupil may be at increased risk of neglect, abuse or exploitation, for example where essential medical information or medication is repeatedly not provided, the school will respond in accordance with its safeguarding procedures.

Pupils will be supported in accordance with the Trust Supporting Pupils With Medical Conditions and Anaphylaxis Policies.

Pupils who are lesbian, gay or bisexual
The fact that a pupil is lesbian, gay or bisexual is not, in itself, a risk factor for harm; however, the school recognises that these pupils, or those perceived to be lesbian, gay or bisexual, may be more vulnerable to discriminatory bullying.

The school will take appropriate steps to prevent and respond to bullying and ensure that all pupils feel safe, respected and supported.

Pupils who are questioning their gender
The Trust recognises that some pupils may question their gender and that they may have additional vulnerabilities, including mental health or psychosocial needs.

The school will take time to understand the individual circumstances of pupils who are questioning their gender and will respond on a case-by-case basis, acting in the best interests of the pupil and taking account of the safety and wellbeing of all pupils.

The school will not initiate action relating to social transition. Where a request for support is received from a pupil or their parent, the school will respond in accordance with the latest DfE KCSIE guidance, taking a cautious approach, involving the DSL and, except where doing so would place the pupil at risk of significant harm, working in partnership with parents.

Where a pupil discloses that they are questioning their gender or requests support in relation to social transition, staff will listen carefully and respond sensitively. Staff will not promise confidentiality and will explain that any information shared may need to be discussed with the DSL in order to safeguard and promote the pupil's welfare.

The school will maintain a culture in which bullying is not tolerated and will ensure that pupils who are questioning their gender receive appropriate safeguarding support and are able to raise concerns with trusted members of staff.

The DSL will ensure that appropriate records are maintained of any requests relating to social transition, the factors considered, decisions made, and the reasons for those decisions. Records will be kept securely in accordance with the Data Protection Policy.

13. Use of the school premises for non-school activities

Where a school hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

Where the activities are under the direct supervision or management of school staff, Trust child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the school will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The headteacher will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The Trust will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

14. Alternative provision

The school will remain responsible for a pupil's welfare during their time at an alternative provider. These expectations are fully outlined in the Trust Alternative Provision Policy. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs.

Those responsible for the commissioning of AP will be aware that pupils in AP will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

The school will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment. This will include written confirmation that the alternative provider will inform the school of any arrangements that may put the pupil at risk.

The school will continue to carry out safeguarding checks and conduct its own due diligence to ensure that the AP is appropriate for meeting each pupil's individual needs.

The school will ensure that the location of pupils placed at AP is always known and will maintain records of the address of the alternative provider and any subcontracted provision or satellite sites the pupil may attend.

AP placement reviews will take place at least half termly to ensure that pupils are regularly attending and the placement continues to be safe and meets their needs.

Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

15. Work experience

When a pupil is sent to a Trust school on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place.

The school will not allow someone on the barred list to engage in regulated activity with a pupil on a work experience placement.

Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

16. Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

17. Reporting and responding to concerns about pupils

Reporting concerns

Staff members will maintain an attitude of 'it could happen here' where safeguarding is concerned. Staff will always act in the best interests of a pupil when they are concerned about their welfare.

Staff will be aware that data protection laws do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If there is any doubt about sharing information, staff will speak to the DSL or deputy. Fears about sharing information will not stand in the way of the need to safeguard and promote the welfare of children.

If a member of staff has any concern about a pupil's welfare, or a pupil has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSL.

Staff will not assume that a colleague or other professional will take action and share information that might be critical in keeping pupils safe. Staff will be mindful that early information sharing is vital for effective identification, assessment, and allocation of appropriate service provision.

Where the DSL is not available to discuss the concern, staff members will contact the deputy DSL with the matter. If, in exceptional circumstances, neither the DSL nor deputy is available, this will not delay action being taken. Staff will consider speaking to a member of the SLT and/or take advice from Truist leaders or LA children's social care. In these circumstances, any action taken will be shared with the DSL or deputy as soon as possible.

Determining the appropriate response

Following a report, the DSL or deputy DSL will consider the information provided, the pupil's level of need and any known history before determining the most appropriate course of action.

This may include:

- Managing any support for the pupil internally via the school's pastoral support processes, including considering where doing so does not place the pupil at additional risk, and whether the DSL or deputy should inform parents to further support the pupil's wellbeing.
- Undertaking a family help assessment.
- Making a referral to statutory services, e.g. as the pupil could be in need, is in need or is suffering, or likely to suffer harm.

Where a community-based early help or family help assessment is undertaken, the DSL will normally coordinate the school's involvement with partner agencies. Staff will contribute to assessments, planning and reviews as required. The school will keep all cases under regular review and will request further intervention or make a referral to CSCS where the pupil's circumstances do not improve or where risks increase.

Staff members will be advised to read the DfE's guidance on information sharing to support them in the event that they need to make a decision about sharing information.

Referrals and multi-agency working

Where a pupil is suffering, or is likely to suffer, significant harm, or is in immediate danger, a referral will be made immediately to CSCS and/or the police, as appropriate. Referrals will follow the local referral process. Where a criminal offence is suspected, including incidents of sexual violence, the police will be notified without delay.

The reporting and referral process outlined in the DfE's flowchart setting out the actions taken where there are concerns about a pupil will be followed accordingly.

The DSL will be familiar with local safeguarding partnership referral arrangements and will provide advice and support to staff where required. Information will be shared with external agencies in accordance with data protection legislation and the school's confidentiality procedures.

Where the school makes a referral, the DSL will expect to receive confirmation of the LA social worker's decision within one working day. Where this information is not forthcoming, the DSL will follow this up.

If the LA social worker decides to carry out a statutory assessment, the DSL or deputy will do everything they can to support this process, with assistance from relevant staff members as required.

If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

The DSL will maintain effective liaison with CSCS, the police and other relevant agencies to support the pupil's welfare and ensure that the school does not compromise any ongoing investigations.

The school will not wait for the outcome of a statutory or criminal investigation before taking appropriate action to safeguard and support the pupil. Where statutory intervention is not required, the school will continue to consider appropriate support through community-based early help, family help, pastoral support or other suitable interventions.

Supporting pupils and recording concerns

Where safeguarding concerns arise, the school will ensure that the pupil's wishes and feelings are taken into account and that pupils are given opportunities to express their views, where appropriate. Staff will respond calmly and supportively, ensuring pupils feel listened to, taken seriously and supported.

Discussions with parents will take place where appropriate and where doing so will not place the pupil or others at increased risk of harm. The school will work with parents and partner agencies, where appropriate, to support the pupil's safety and wellbeing.

All safeguarding concerns, discussions, decisions and the reasons for those decisions will be recorded promptly by the DSL or deputy DSL and stored securely in accordance with the school's CPOMs record management procedures.

18. Concerns about school safeguarding practices

Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Trust Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

19. Safeguarding concerns and allegations of abuse against staff

All allegations against staff, supply staff, trainee teachers, volunteers and contractors will be managed in line with the Trust Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties, including the Local Authority Designated Officer (LADO).

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold (initiating LADO contact) and allegations that do not, also known as “low-level concerns”, as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

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

Low-level concerns will be handled in line with the schools’ Low-level Safeguarding Concerns Policy.

20. Communication and confidentiality

When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within the school and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children’s social care or the Prevent program.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school and Trust will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving the school, the DSL will share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

21. Safer recruitment

The Trust's full policy and procedures for safer recruitment are outlined in the Trust Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members and volunteers engaged in regulated activity.

The school will determine whether a role constitutes regulated activity in accordance with current legislation and DfE guidance, including the DBS Workforce Guides. This will include staff, volunteers and third-party personnel engaged in regulated activity. Where a role constitutes regulated activity, an enhanced DBS certificate with barred list information will be obtained before the individual begins work.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The school will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

The school will also ensure that trainee teachers and other individuals undertaking placements are subject to the appropriate safeguarding and recruitment checks in accordance with KCSIE and the Safer Recruitment Policy.

Staff suitability

All schools providing care for pupils under the age of eight must ensure that staff and volunteers working in

these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them, or have committed certain offences.

All staff members are required to sign the Annual Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

Ongoing suitability
Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to pupils or placing pupils at risk.

Referral to the DBS
The Trust will refer an individual to the DBS where the legal duty to do so is met, including where they have harmed, or pose a risk of harm to, a pupil and have been removed from regulated activity, or would have been removed had they not resigned, retired or otherwise left their role.

22. Single central record (SCR)

Each individual school keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school. All members of the Local Governing body are also recorded on the SCR.

The Trust holds a central SCR containing all centrally employed staff.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery) and the date that confirmation was received.

For volunteers engaged in regulated activity, the school will record on the SCR the same pre-appointment checks required for individuals undertaking regulated activity, including an enhanced DBS certificate with children's barred list information. Where checks are undertaken for volunteers who are not engaged in regulated activity, these will also be recorded on the SCR. A risk assessment is undertaken for all volunteers, regardless of the level of check undertaken. Written confirmation that supply agencies have completed all relevant checks will also be included.

The details of an individual will be removed from the SCR once they no longer work at the school.

23. Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated on a regular basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE).
- The Behaviour Policy.
- The Children Missing from Education Policy, including the safeguarding response to children who are absent from education.
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. The Trust Safeguarding Training Matrix is detailed within the Strategic Safeguarding Framework. Training will cover, at a minimum:

- A full overview of Part 1 of KCSIE, including:
    - The issues surrounding sexual violence and sexual harassment.
    - Contextual safeguarding.
    - How to keep LAC and PLAC safe.
    - CCE, CSE, modern slavery and trafficking, including where a referral to National Referral Mechanism may be appropriate.
    - Online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSL and deputy DSLs will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing community-based early help, family help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.

- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

24. Contextual Safeguarding Issues for the School

Whilst this safeguarding policy is written at Trust level, it is important that the policy reflects the local safeguarding issues, or contextual safeguarding risks for each individual school.

Lingdale Primary School has identified the following as key local issues pertinent to the safety and wellbeing of our pupils:

• Local risks – the curriculum includes water safety / road and fire safety to support children living close to busy roads, the sea and lakes.

• School situated in an area of high deprivation, crime, low levels of employment, poor health outcomes and social housing. This results in above average % of children in receipt of Pupil Premium and multiple vulnerabilities of children in our care.

• Domestic Violence

• Online Safety

These concerns reflect the specific challenges faced by children and families within our local community. In response, our PSHE (Personal, Social, Health and Economic) curriculum has been carefully designed and regularly reviewed to ensure that it equips our pupils with the knowledge, skills and strategies to keep themselves safe both in person and online. Through age-appropriate and sensitively delivered lessons, children are taught how to:

• Understand what constitutes a healthy relationship, recognise signs of domestic abuse, and know where to seek help.

• Stay safe online, including understanding privacy, cyberbullying, digital consent, and the responsible use of social media and digital devices.

• Identify, prevent, and respond to child-on-child abuse, including bullying, sexual harassment, and peer pressure.

We work closely with external agencies, local services and the wider school community to provide a safe and supportive environment where children feel empowered to speak up and seek support when needed. The local PCSO's and Fire Fighters are regular visitors to Lingdale and provide support and awareness sessions. We also link into agencies like Harbour to provide support with vaping and awareness. Staff are trained to deliver PSHE content with confidence and care, ensuring that safeguarding is at the heart of our curriculum. Our approach is proactive, inclusive and tailored to the evolving needs of our children, preparing them to become safe, resilient and informed individuals in our community and beyond.

25. Monitoring and review

This policy is reviewed at least annually by Trust Strategic Safeguarding Lead, which is presented and discussed at full Trust Board for approval. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the school. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the school's procedures.

If any concerns are raised by the LADO or Ofsted about safeguarding issues, the Trust Deputy CEO will liaise with the required professionals and coordinate any required investigation and/or response.

Annex A

Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

The Trust recognises that many of the safeguarding issues described in this appendix may be facilitated by technology or occur wholly online. Staff will remain alert to online indicators of abuse, exploitation and harm and respond in accordance with this policy.

Here are the issues covered:

1. Domestic abuse
2. Homelessness
3. Children absent from education
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. Cyber-crime
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM
10. Virginity testing and hymenoplasty
11. Forced marriage
12. Radicalisation
13. Pupils with family members in prison
14. Pupils required to give evidence in court
15. Mental health
16. Serious violence

17. Adult involvement in the making or sharing of nude or semi-nude images

Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, **"domestic abuse"** is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. **"Abusive behaviour"** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. **"Personally connected"** includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to".

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

Children absent from education

A child who is absent from education can be a vital warning sign of abuse, neglect, exploitation, mental health concerns and other safeguarding issues, including CCE and CSE. The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing from Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

The school will follow the DfE's guidance on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable

- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

Child abduction and community safety incidents

For the purposes of this policy, **"child abduction"** is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child criminal exploitation (CCE)

For the purposes of this policy, **"child criminal exploitation"** is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- County lines

For the purposes of this policy, **"county lines"** refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber-crime

For the purposes of this policy, **"cyber-crime"** is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

Child sexual exploitation (CSE)

For the purposes of this policy, **"child sexual exploitation"** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can

legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Modern slavery

For the purposes of this policy, **"modern slavery"** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

FGM

For the purposes of this policy, **"FGM"** is defined as all procedures involving the 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.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is

important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called **"'honour-based' abuse (HBA)"**, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

Forced marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and CSCS.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated about the issues surrounding forced marriage and the signs to look out for.

Radicalisation

For the purposes of this policy, **"radicalisation"** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, **"extremism"** refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, **"terrorism"** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **"the Prevent duty"**. The Prevent duty will form part of the school's wider safeguarding obligations.

The Trust procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Trust Prevent Duty Policy.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the school's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.

- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been suspended, spent time in AP or permanently excluded from school.
- Having experienced child maltreatment.
- Having used drugs or alcohol in early adolescence.
- Having Previously been a victim or previously perpetrated violence.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

The school will cooperate with safeguarding partners, CSCS, the police and other relevant agencies where appropriate.

Adult involvement in the making or sharing of nude or semi-nude images

The school's full response to the making or sharing of nude or semi-nude images is outlined in the Child-on-Child Abuse and Online Safety Policies.

Sexually motivated incidents

The school will remain aware that not all instances involving the making or sharing of nude or semi-nude images will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing the nude or semi-nude images. These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered money or gifts.
- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.
- *Financially motivated incidents*

Financially motivated incidents involving the making or sharing of nude or semi-nude images involving adults may also be called **"sextortion"**, where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, e.g. paying money. In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
- Use images that have been stolen from the child or young person, e.g. via hacking.

- Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing sexual images first.
- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked in order to obtain images, personal information, and contacts.
- Being blackmailed into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.