

Helping people living in extraordinary circumstances to live ordinary lives

Kingsley Learning Foundation Trust

Child Protection & Safeguarding Policy

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| Point | Contents | Page |
|-----------------|---|-------------|
| 1 | Aims | 4 |
| 2 | Legislation and statutory guidance | 4 |
| 2.2 | Safeguarding partners | 5 |
| 3 | Definitions | 5 |
| 4 | Equality statement | 6 |
| 5 | Roles and responsibilities | 6 |
| 5.2 | All staff | 6 |
| 5.3 | The Designated Safeguarding Lead (DSL) | 7 |
| 5.4 | The Governing Board | 7 |
| 5.5 | The Headteacher | 8 |
| 5.6 | Virtual School Headteachers | 8 |
| 6 | Confidentiality | 9 |
| 7 | Recognising abuse | 9 |
| 8 | Taking action | 10 |
| 8.1 | If a child is suffering, likely to suffer, or in immediate danger | 10 |
| 8.2 | If a child makes a disclosure to you | 10 |
| 8.3 | If you discover that FGM has taken place or a pupil is at risk of FGM | 10 |
| 8.4 | If you have concerns about a child | 11 |
| 8.5 | Early Help Assessment (EHA) | 11 |
| 8.6 | Referral | 11 |
| 8.7 | If you have a concern about extremism | 11 |
| 8.8 | If you have a concern about mental health | 12 |
| Figure 1 | Procedure if you have concerns about a child’s welfare | 13 |
| 9 | Concerns about a staff member, supply staff, volunteer or contractor | 14 |
| 10 | Allegations of abuse made against other pupils | 14 |
| 10.4 | Procedures for dealing with allegations of child-on-child abuse | 14 |
| 10.5 | Creating a supportive environment in school and minimising the risk of child-on-child abuse | 14 |
| 11 | Sharing of nudes and semi-nudes (‘sexting’) | 15 |
| 11.1 | Your responsibilities when responding to an incident | 15 |
| 11.2 | Initial review meeting | 15 |
| 11.3 | Further review by the DSL | 16 |
| 11.4 | Informing guardians | 16 |
| 11.5 | Referring to the police | 16 |
| 11.6 | Recording incidents | 16 |
| 11.7 | Curriculum coverage | 16 |
| 11.8 | Reporting systems for our pupils | 17 |
| 12 | Online safety and the use of mobile technology | 17 |
| 12.3 | The 4 key categories of risk | 17 |
| 12.4 | To meet our aims and address the risks | 17 |
| 13 | Artificial Intelligence (AI) | 18 |
| 14 | Notifying guardians | 18 |
| 15 | Pupils with special educational needs, disabilities or health issues | 18 |
| 16 | Pupils with a social worker | 19 |
| 17 | Looked-after and previously looked-after children | 19 |
| 18 | Pupils who are lesbian, gay, bisexual or gender questioning | 19 |

| | | |
|-------------------|---|----|
| 19 | Complaints and concerns about school safeguarding | 20 |
| 19.1 | Complaints against staff | 20 |
| 19.2 | Other complaints | 20 |
| 19.3 | Whistleblowing | 20 |
| 20 | Record keeping | 20 |
| 21 | Training | 20 |
| 21.2 | Safeguarding and child protection training | 20 |
| 21.3 | All Staff: child-on-child abuse | 20 |
| 21.4 | Designated Safeguarding Lead (DSL) and deputies | 21 |
| 21.5 | Governors | 21 |
| 21.6 | Recruitment – interview panels | 21 |
| 21.7 | DSL/DDSL supervision | 21 |
| 22 | Monitoring arrangements | 21 |
| 23 | Link with other policies | 21 |
| Appendix 1 | Types of abuse | 22 |
| | Abuse | 22 |
| | Physical abuse | 22 |
| | Emotional abuse | 22 |
| | Sexual abuse | 22 |
| | Neglect | 22 |
| Appendix 2 | Specific safeguarding issues | 23 |
| | Assessing adult-involved nude and semi-nude sharing incidents | 23 |
| | Sexually motivated incidents | 23 |
| | Financially motivated incidents | 23 |
| | Children who are absent from education | 24 |
| | Child Criminal Exploitation (CCE) | 24 |
| | Child Sexual Exploitation (CSE) | 24 |
| | Domestic abuse | 25 |
| | Homelessness | 25 |
| | So-called ‘honour-based’ abuse (including FGM and forced marriage) | 25 |
| | • FGM | 25 |
| | • Forced marriage | 26 |
| | Preventing radicalisation | 26 |
| | Child-on-child abuse | 27 |
| | • Sexual violence and sexual harassment between children in schools | 27 |
| | • Problematic and harmful sexual behaviour | 28 |
| | ◦ Public self-stimulation and masturbation | 28 |
| | ◦ Inappropriate touching of others | 28 |
| | ◦ Sexualised language | 28 |
| | ◦ Undressing or indecent exposure | 28 |
| | ◦ Inappropriate interest in others’ bodies | 28 |
| | • Procedures for minimising opportunities for child-on-child abuse | 29 |
| | • How we address child-on-child abuse within the curriculum and across the school | 29 |
| | • Additional vulnerabilities | 29 |
| | • Immediate response | 30 |
| | • Tailored, educational intervention | 30 |
| | • Collaboration and support | 30 |

| | | |
|-------------------|--|----|
| | • Ongoing monitoring and review | 30 |
| | • How to report concerns | 30 |
| | ◦ Our pupils | 30 |
| | ◦ Our staff | 31 |
| | ◦ Others | 31 |
| | ◦ Wider concerns | 31 |
| | • What happens when an allegation of child-on-child abuse is made | 31 |
| | • How we support victims of child-on-child abuse | 32 |
| | • How we support alleged perpetrators and perpetrators of child-on-child abuse | 32 |
| | • How we support other children who may have been affected by child-on-child abuse | 33 |
| | • Local safeguarding arrangements and making referrals | 33 |
| | • Guardians | 33 |
| | • Whole school response | 33 |
| | Serious violence | 33 |
| | Checking the identity and suitability of visitors | 34 |
| | Non-collection of children | 34 |
| | Missing pupils | 34 |
| Appendix 3 | Important contacts | 35 |

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote pupil's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues.

2. Legislation and statutory guidance

2.1 This policy is based on the Department for Education's (DfE's) statutory guidance in [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners (see section 3). This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of Keeping Children Safe in Education 2025 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- Part 1 of the schedule to the [Non-Maintained Special Schools \(England\) Regulations 2015](#), which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Governors and Headteachers should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

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

2.2 Safeguarding partners

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

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

3. Definitions

3.1 **Safeguarding and promoting the welfare** of children means:

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

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

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

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

3.5 **Child-on-child abuse** is any abuse of a child or children that are perpetrated by a child or children. This includes all forms of bullying, cyberbullying, discriminatory bullying, abuse in intimate personal relationships between children, physical abuse, sexual violence, sexual harassment, up skirting and initiation rituals and hazing.

3.6 **Child-on-child sexual violence** is rape, assault by penetration, sexual assault (this may include an online element) which facilitate, threatens and/or encourages sexual violence.

3.7 **Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

3.8 **Children** includes everyone under the age of 18.

- 3.9 **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- 3.10 **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

4.1 Some pupils have an increased risk of abuse, both online and offline, and additional barriers can exist for some pupils with respect to recognising or disclosing it.

4.2 We are committed to anti-discriminatory practice and recognise pupil's diverse circumstances.

4.3 We ensure that all pupils have the same protection, regardless of any barriers they may face.

4.4 We give special consideration to pupils who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 17)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- May be removed from school to be home educated (as indicated by their guardian).

5. Roles and responsibilities

5.1 Safeguarding and child protection is **everyone's** responsibility.

5.1.1 This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the three safeguarding partners.

5.1.2 Our policy and procedures also apply to extended school and off-site activities.

5.1.3 The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called 'honour-based' violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why these are always unacceptable.

5.2 All staff

5.2.1 Staff who work directly with pupils are expected to read at least Part One of Keeping Children Safe in Education (KCSIE).

5.2.2 All staff will:

- Read and understand Part One and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- Access safeguarding documents on appropriate software which will record when the documents have been read

- Reinforce the importance of online safety when communicating with guardians. This includes making guardians aware of what we ask pupils to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

5.2.3 All staff will be aware of:

- Our systems that support safeguarding, including this Child Protection and Safeguarding Policy, the staff Code of Conduct Policy, the role and identity of the Designated Safeguarding Lead (DSL) and deputies, Online Safety Policy, and the safeguarding response to children who go missing from education
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a pupil tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse including sexual violence and harassment, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that pupils can be at risk of harm inside and outside of their home, at school and online
- The fact that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other pupils
- That a pupil and their family may be experiencing multiple needs at the same time
- What to look for to identify pupils who need help or protection.

5.2.4 Section 16 of this policy outlines in more detail how staff are supported to do this.

5.3 The Designated Safeguarding Lead (DSL)

5.3.1 The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

5.3.2 During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. When the DSL is absent, the deputies will act as cover.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of pupils
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Make sure that staff have appropriate Prevent training and induction.

5.3.4 The DSL will also:

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

5.3.5 The full responsibilities of the DSL and deputies are set out in their job description.

5.4 The Governing Board

5.4.1 The Governing Board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full Governing Board - this is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

5.4.2 The Governing Body will make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors)
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are pupils on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

5.4.3 The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate.

5.4.4 All governors will read Keeping Children Safe in Education in its entirety.

5.4.5 Section 21.5 of this policy has information on how governors are supported to fulfil their role.

5.5 The Headteacher

5.5.1 The Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems that support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Ensuring this policy is available to guardians via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each pupil in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting.

5.6 Virtual School Headteachers

5.6.1 Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

5.6.2 They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

6. Confidentiality

6.1 The school's approach to confidentiality and data protection with respect to safeguarding follow Kingsley Learning Foundation Trust processes and principles for sharing information within school, the Trust, and with the three safeguarding partners and other agencies as required.

6.2 You should note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of pupils
- The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if:
 - It is not possible to gain consent;
 - It cannot be reasonably expected that a practitioner gains consent;
 - If to gain consent would place a child at risk.
- Staff should never promise a pupil that they will not tell anyone about a report of abuse, as this may not be in the pupil's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

6.3 The DSL should consider that:

- 6.3.1 Guardians should normally be informed (unless this would put the victim at greater risk)
- 6.3.2 The basic safeguarding principle is:
 - If a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.
 - While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- 6.3.3 Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for pupils involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

6.4 The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

6.5 If staff are in any doubt about sharing information, they should speak to the DSL (or deputies).

6.6 Confidentiality is also addressed in this policy with respect to record keeping in section 20, and Allegations Against Staff (incl. low level) Policy.

7. Recognising abuse

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

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved

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

7.1.1 Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

7.1.2 *Please note - in this and subsequent sections, you should take any references to the DSL to mean the DSL or deputy DSL's.*

8. Taking action

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

8.1.1 Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger.

8.1.2 **Anyone can make a referral.** Tell the DSL as soon as possible if you make a referral directly.

8.2 If a child makes a disclosure to you

8.2.1 If a pupil discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the pupil they have done the right thing in telling you; do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Record on MyConcern as soon as possible in the pupil's own words. Stick to the facts, and do not put your own judgement on it. If the pupil is in imminent danger, inform a DSL immediately.
- Alternatively, if appropriate, make a referral to local authority children's social care (see section 8.1), and/or the police directly and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.
- Bear in mind that some children may:
 - Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
 - Not recognise their experiences as harmful
 - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

8.2.2 None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a pupil.

8.3 If you discover that FGM has taken place or a pupil is at risk of FGM

8.3.1 Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

8.3.2 FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

8.3.3 Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix 2 of this policy.

8.3.4 **Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth must immediately report this to the police, personally.
- 8.3.5 This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
- 8.3.6 Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.
- 8.3.7 **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.
- 8.3.8 The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.
- 8.3.9 **Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

8.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

- 8.4.1 Figure 1 below, illustrates the procedure to follow if you have any concerns about a pupil's welfare.
- 8.4.2 Where possible, speak to the DSL first to agree a course of action.
- 8.4.3 If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care.
- 8.4.4 You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
- 8.4.5 Make a referral to local authority children's social care directly, if appropriate (see Referral – section 8.6). Share any action taken with the DSL as soon as possible.

8.5 Early Help Assessment (EHA)

- 8.5.1 If an EHA is appropriate, the DSL or qualified member of staff will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate.
- 8.5.2 Staff may be required to support other agencies and professionals in an EHA, in some cases acting as the lead practitioner.
- 8.5.3 We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment as part of local arrangements.
- 8.5.4 The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

8.6 Referral

- 8.6.1 If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.
- 8.6.2 If you make a referral directly (see section 8.1), you must tell the DSL as soon as possible.
- 8.6.3 The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome.
- 8.6.4 The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- 8.6.5 If the pupil's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the pupil's situation improves.

8.7 If you have concerns about extremism

- 8.7.1 If a pupil is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
- 8.7.2 If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see Referral – section 8.6). Inform the DSL or a deputy as soon as practically possible after the referral.
- 8.7.3 Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.
- 8.7.4 The DfE also has a dedicated telephone helpline (020 7340 7264), which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

8.7.5 In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related.

8.8 If you have a concern about mental health

8.8.1 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.

8.8.2 Staff will be alert to behavioural signs that suggest a pupil may be experiencing a mental health problem or be at risk of developing one.

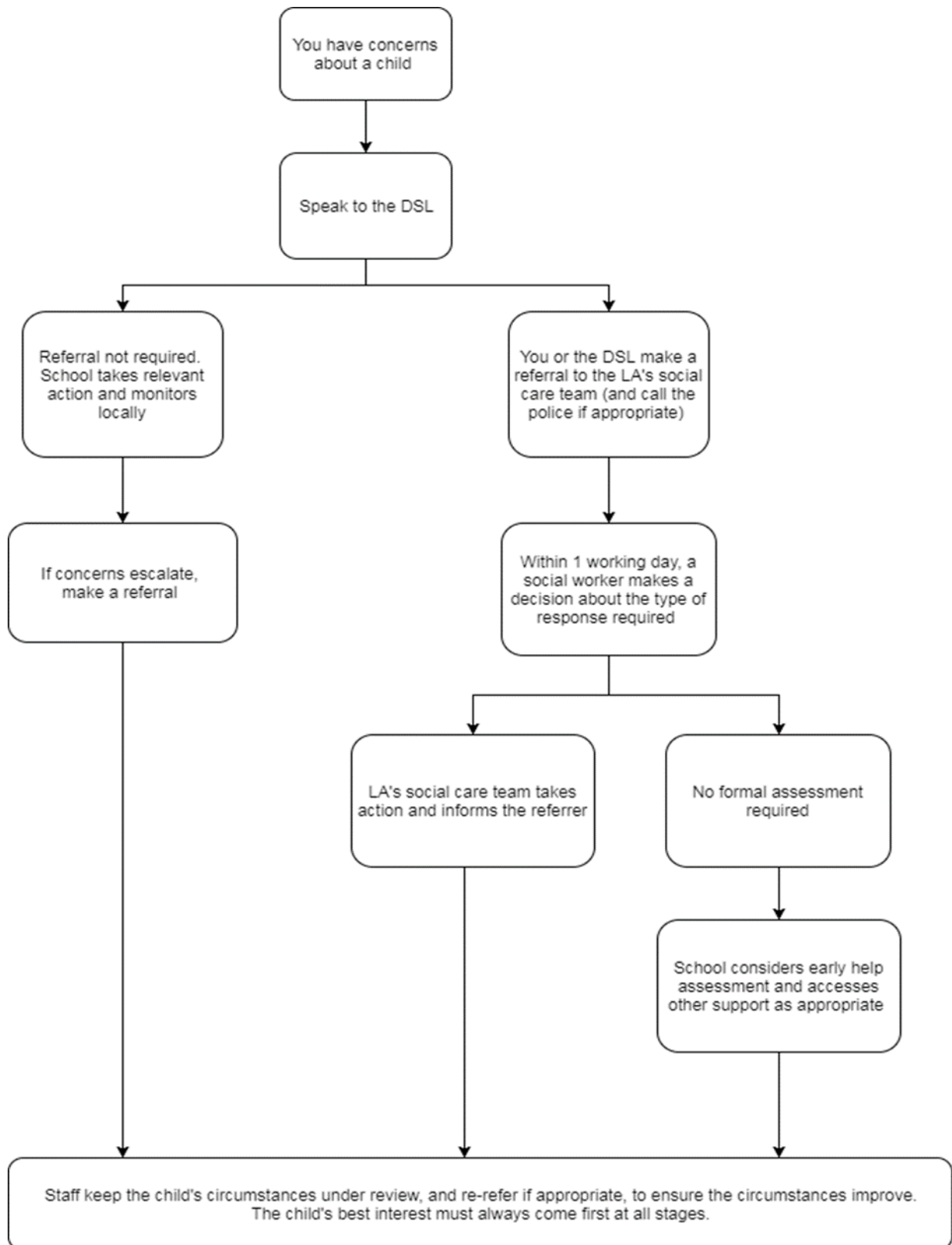
8.8.3 If you have a mental health concern about a pupil that is also a safeguarding concern, take immediate action by following the steps in section 8.4.

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

8.8.5. Refer to the DfE guidance on [mental health and behaviour in schools](#) for more information.

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

(Note – if the DSL is unavailable, this should not delay action. See section 8 for what to do.)



9. Concerns about a staff member, supply staff, volunteer or contractor

9.1 If you have concerns about a member of staff (including supply staff, volunteer or contractor), or an allegation is made about a member of staff (including supply staff, volunteer or contractor) posing a risk of harm to pupils, speak to the Headteacher as soon as possible.

9.2 If the concerns/allegations are about the Headteacher, speak to the Chair of Governors.

9.3 The Headteacher/Chair of Governors will then follow the procedures, if appropriate.

9.4 If the concerns/allegations are about the Headteacher, the Chair of Governors will speak to the local authority designated officer (LADO).

9.5 Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including supply staff, volunteer or contractor) to the Headteacher, report it directly to the LADO

9.6 If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, DSLs informing the LADO, as with any safeguarding allegation.

9.7 Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

10. Allegations of abuse made against other pupils

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

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

10.3 Most cases of pupils hurting other pupils will be dealt with under our school’s Behaviour and Motivation Policy, but this Child Protection and Safeguarding Policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

See Appendix 2 for more information about child-on-child abuse.

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

10.4.1 If a pupil makes an allegation of abuse against another pupil:

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

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

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

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems.
- Ensure staff reassure victims that they are being taken seriously

- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support pupils who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a pupil’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Pupils can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A pupil’s behaviour might indicate that something is wrong
 - That certain pupils may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the pupil is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a pupil may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

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

10.5.3 Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly.

10.5.4 We will consider these matters on a case-by-case basis, taking into account whether:

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

11. Sharing of nudes and semi-nudes (‘sexting’)

11.1 Your responsibilities when responding to an incident

11.1.1 If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’), including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

11.1.2 You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, guardians
- Say or do anything to blame or shame any pupils involved
- You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

11.2 Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children’s social care
- If it is necessary to view the image(s) in order to safeguard the pupil (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact guardians of the pupils involved (in most cases guardians should be involved).
- The DSL will make an immediate referral to police and/or children’s social care if:
 - The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See Appendix 2 for more information on assessing adult-involved incidents
 - There is reason to believe that a pupil has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
 - What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the pupil’s developmental stage, or are violent
 - The imagery involves sexual acts and any pupil in the images or videos is under 18
 - The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the pupil is presenting as suicidal or self-harming).

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

11.3 Further review by the DSL

11.3.1 If at the initial review stage a decision has been made not to refer to police and/or children’s social care, the DSL will conduct a further review to establish the facts and assess the risks.

11.3.2 They will hold interviews with the pupils involved (if appropriate).

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

11.4 Informing guardians

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

11.5. Referring to the police

11.5.1 If it is necessary to refer an incident to the police, this will be done through contacting the police by dialing 111.

11.6 Recording incidents

11.6.1. All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record keeping arrangements set out in section 20 of this policy also apply to recording these incidents.

11.7 Curriculum coverage

11.7.1 Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education, if and when appropriate.

11.7.2 Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

11.7.3 Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images
- Pupils will be made aware of the process the school will follow in the event of a concern.

11.7.4 Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes.

11.8. Reporting systems for our pupils

11.8.1 Where there is a safeguarding concern, along with following statutory obligations, we will take the pupil's wishes and feelings into account when determining what action to take and what services to provide, when appropriate.

11.8.2 We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

12. Online safety and the use of mobile technology

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

12.2 To address this, our school aims to:

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

12.3 The 4 key categories of risk

12.3.1 Our approach to online safety is based on addressing the following categories of risk:

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

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

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyberbullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyberbullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate guardians about online safety via our website and communications sent directly to them.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone, smart watch and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
 - Smart watches are permitted but are required to be put in 'airplane mode' when working with or around pupils.
- Make pupils, guardians, staff, volunteers and governors aware that there is acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology, and sign (if appropriate).

- Explain the sanctions we will use if anyone is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and guardians are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the Child Protection and Safeguarding Policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

12.5 This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our Online Safety Policy and Code of Conduct.

13. Artificial Intelligence (AI)

13.1 Generative artificial intelligence (AI) tools are now widespread and easy to access.

13.2 Staff, pupils and guardians may be familiar with generative chatbots such as ChatGPT and Google Gemini.

13.3 Kingsley Learning Foundation Trust recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils.

13.4 However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

13.5 Kingsley Learning Foundation Trust will treat any use of AI to access harmful content or bully pupils in line with this policy, our Anti-Bullying Policy and artificial intelligence support documents.

13.6 Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

13.7 Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education 2025.

13.8 Any safeguarding concerns related to AI, for example where indecent images have been shared that are AI-generated, staff will follow our school procedures and report any concerns on MyConcern and inform a DSL immediately.

13.9 AI tools must not compromise safeguarding, expose individuals to harmful content, or infringe privacy.

14. Notifying guardians

14.1 Where appropriate, we will discuss any concerns about a pupil with their guardians. The DSL will normally do this in the event of a suspicion or disclosure.

14.2 Other staff will only talk to guardians about any such concerns following consultation with the DSL.

14.3 If we believe that notifying the guardians would increase the risk to the pupil, we will discuss this with the local authority children's social care team before doing so.

14.4 In the case of allegations of abuse made against other pupils, we will normally notify the guardians of all the pupils involved. We will think carefully about what information we provide about the other pupil involved, and when.

14.5 We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

14.6 The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's guardians, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's guardians to discuss support for them, and what's being put in place.

15. Pupils with special educational needs, disabilities or health issues

15.1 We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Pupils with disabilities are more likely to be abused than their peers.

15.2 Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

15.3 We offer extra pastoral support for all pupils.

15.4 Any abuse involving pupils with SEND will require close liaison with the DSL.

16. Pupils with a social worker

16.1 Pupils may need a social worker due to safeguarding or welfare needs.

16.2 We recognise that a pupil's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

16.3 The DSL and all members of staff will work with and support social workers to help protect vulnerable pupils.

16.4 Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

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

17. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about pupil's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of pupil's social workers and relevant virtual school heads.
- We have appointed a designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

17.2 As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans (PEP).

18. Pupils who are lesbian, gay, bisexual or gender questioning

18.1 We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other pupils.

18.2 We also recognise that LGBTQ+ pupils are more likely to experience poor mental health. Any concerns should be reported to the DSL. Our pastoral team offer 1:1 support for any pupils who requires support and will signpost them to specialist services accordingly.

18.3 When guardians are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal pupils.

18.4 When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism (ASD) and/or attention deficit hyperactivity disorder (ADHD).

18.5 We will also consider the broad range of their individual needs, in partnership with their guardians (other than in rare circumstances where involving guardians would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

18.6 Risks can be compounded where pupils lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

19. Complaints and concerns about school safeguarding

19.1 Complaints against staff

19.1.1 Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures.

19.2 Other complaints

19.2.1 Any other complaint will be dealt with using the appropriate policy or procedure.

19.3 Whistleblowing

19.3.1 The Kingsley Learning Foundation Trust Whistleblowing Policy can be found on the school's website.

20. Record keeping

20.1 All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme. If you are in any doubt about whether to record something, discuss it with the DSL.

20.2 Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome.

20.3 Concerns and referrals will be logged on MyConcern.

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

20.5 Safeguarding records relating to individual children will be retained - please refer to our Data Retention Schedule for further guidance.

20.6 If a pupil for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

20.7 To allow the new school/college to have support in place when the pupil arrives, this should be within:

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

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

21. Training

21.1 Staff training on safeguarding children is a vital part of our school's commitment to creating a safe environment. Below is a clear breakdown of the training and responsibilities for all members of our school community.

21.2 Safeguarding and child protection training

21.2.1 All staff will complete comprehensive **safeguarding and child protection training** upon induction. This training will cover:

- Whistleblowing procedures
- Online safety, including your responsibilities for filtering and monitoring
- The government's anti-radicalisation strategy, **Prevent**, to help identify and challenge extremist ideas and recognise students at risk of becoming involved with terrorism.

21.2.2 This training will be regularly updated (at least annually) and integrated into our school's broader safeguarding approach. It will also support the Teachers' Standards, ensuring all teachers effectively manage behaviour and understand the needs of all pupils.

21.2.3 Additionally, staff will receive regular updates on safeguarding and child protection, including online safety, through channels like emails, staff meetings and additional training. Volunteers will receive appropriate training as needed.

21.3 All staff: child-on-child abuse

21.3.1 Every staff member will be made aware that **child-on-child abuse** can occur both in-person and online, at school or outside of it. All staff will receive training to confidently **recognise the signs and indicators of abuse** so they can identify and respond appropriately to any reports.

21.3.2 It is crucial that all staff understand our policies and procedures regarding child-on-child abuse and their role in both preventing and responding to it. They will learn how addressing even seemingly minor inappropriate behaviour can be a critical early intervention that helps prevent future problematic or violent behaviour.

21.4 Designated Safeguarding Lead (DSL) and deputies

21.4.1 The DSL and their deputies are required to complete child protection and safeguarding training at least every two years. They will also update their knowledge at least annually by meeting with other DSLs, attending LA forums and staying informed on new developments.

21.4.2 They will also receive more in-depth training on Prevent and extremist ideologies.

21.5 Governors

21.5.1 All governors receive annual training on safeguarding and child protection, including online safety and Prevent. This training ensures they have the knowledge to perform their duties and provide strategic oversight. It also allows them to confirm that our safeguarding policies and procedures are effective.

21.5.2. The Chair of Governors will receive specific training on managing allegations, as they may be required to act as a case manager if an allegation of abuse is made against the Headteacher.

21.6 Recruitment – interview panels

21.6.1 At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education 2025, and will be in line with local safeguarding procedures.

21.7 DSL/DDSL supervision

21.7.1 All necessary staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, and allow for confidential discussions of sensitive issues.

22. Monitoring arrangements

22.1 This policy will be reviewed **annually** by Kingsley Learning Foundation Trust, which will be ratified by the full Governing Board.

23. Links with other policies

23.1. Staff have access to other policies that relate to safeguarding, which are accessible through Smartlog.

These appendices are based on the Department for Education's statutory guidance, *Keeping Children Safe in Education*.

Appendix 1: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material. Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images.

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit.

Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person
- The offender may demand payment or the use of the victim's bank account for the purposes of money laundering

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

Children who are absent from education

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

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families.

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

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child Criminal Exploitation (CCE)

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education.

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

Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant.

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as 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, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police follow their own safeguarding procedures regarding notifying appropriate parties.

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

Where a child is homeless or at risk of becoming homeless, the DSL will make a referral to local authority children's social care.

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 8.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or guardians stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to internal or external agencies as appropriate.

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;

- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk. We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 8 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Child-on-Child Abuse

Including sexual violence and sexual harassment between children in schools

Child-on-child abuse is any abuse of a child or children that is perpetrated by another child or children. This includes all forms of sexual harassment, sexual violence and abuse. We strive to create a culture of safety, where pupils are free from harassment or abuse of any kind. We take a zero tolerance approach to sexual violence and sexual harassment – it is never acceptable and it will not be tolerated.

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

We know that even if we do not receive any reports relating to child-on-child abuse, it does not mean that it is not happening. We support and encourage anyone – especially our pupils – to come forward to share any concerns about child-on-child abuse so that we can take action to keep all children safe.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);

- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All children are capable of abusing their peers and we recognise that girls are more likely to be the victims of child-on-child abuse and boys' perpetrators. All child-on-child abuse is unacceptable and will be taken seriously.

Problematic and harmful sexual behaviour

We recognise that children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent.

Problematic sexual behaviour (PSB) is developmentally inappropriate or socially unexpected sexualised behaviour which doesn't have an overt element of victimisation or abuse.

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour displayed by children and young people which is harmful or abusive.

Pupils in our setting may display a range of sexually-related behaviours that are considered inappropriate or sexualised. These behaviours often stem from a lack of understanding of social norms, boundaries, and privacy, rather than from a place of malice or harmful intent. The behaviours can be divided into a few key categories.

Public self-stimulation and masturbation

This is one of the most common sexually-related behaviours observed. A child may masturbate or touch their genitals in public spaces such as a classroom, playground, or communal area. This is not necessarily due to a sexual urge but rather a form of self-regulation or sensory seeking. They have not learned to differentiate between private and public spaces.

Example: A child rubbing their genitals on a surface or against an object while seated at a table during a lesson.

Inappropriate touching of others

This can range from touching another person's private parts to other forms of non-consensual physical contact. This behaviour is often linked to a lack of understanding of personal boundaries and a desire for social interaction, affection, or attention.

Example: A child hugging or trying to kiss a peer or a staff member without their consent, or touching another child's buttocks or genitals.

Sexualised language

Some pupils may repeat sexualised or explicit language they have heard, often without understanding its meaning. This can be a form of echolalia, where they simply repeat words and phrases, or a way to get a reaction from adults, as such language often elicits a strong response.

Example: A child repeatedly shouting or whispering a swear word with a sexual connotation, having heard it on TV or from peers.

Undressing or indecent exposure

Pupils with learning needs may disrobe or expose themselves in inappropriate settings. This can be a result of not understanding the social rules around nudity and privacy, or it may be linked to a sensory need (e.g. they find the clothing uncomfortable).

Example: A child taking off their clothes in the middle of a school hallway or classroom.

Inappropriate interest in others' bodies

Some children may show an unusual or persistent interest in the bodies of others. This may include looking up skirts, looking at other children when they are changing, or asking intrusive questions about private parts. This behaviour is often driven by a lack of social understanding and a misdirected curiosity.

Example: A child trying to get a peer to take off their clothes or trying to lift a peer's shirt.

In all these cases, these behaviours are viewed through a safeguarding lens, as they can make a child a victim of harm or an unwitting perpetrator. They are not considered "bad" or "malicious," but rather a symptom of the child's developmental stage and their need for explicit, simplified instruction on personal safety, boundaries, and

appropriate social conduct. We would expect the same rigorous process of recording and reporting to be enacted whatever the reason for the behaviour and do not minimise the impact it can have on staff and peers

We refer to problematic, abusive and violent sexual behaviour as 'harmful sexual behaviour'.

When responding to harmful sexual behaviour (HSB), we will:

- Consider the behaviours in a child protection context;
- Consider the ages and developmental stages of the children involved;
- Take action in line with local thresholds and pathways guidance and relevant statutory guidance; and
- Seek specialist support as required.

We will take action at the earliest possible point, to safeguard pupils and to prevent problematic, abusive and/or violent behaviour in the future.

We recognise that pupils displaying HSB have often experienced their own abuse and trauma and we will offer support as required.

Procedures for minimising opportunities for child-on-child abuse

We recognise that a crucial part of our safeguarding responsibility is to minimise the opportunity for child-on-child abuse to occur. In order to do this, and to establish a safe environment for all pupils, we:

- Have a robust behaviour policy, which makes it clear that we have a zero tolerance approach to any kind of child-on-child abuse
- Ensure staff understand what is meant by child-on-child abuse and the school policy on child-on-child abuse by regular updates, completing online and whole school safeguarding training, regular monitoring and moderation of reporting and data analysis
- Train staff thoroughly so that they challenge inappropriate behaviour (even if it appears to be relatively innocuous)
- Train staff thoroughly so that they are confident to challenge inappropriate behaviours between peers, that are actually abusive in nature
- Never downplay certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys", as this can lead to a culture of unacceptable behaviours, an unsafe environment for pupils and in worst case scenarios a culture that normalises abuse leading to pupils accepting it as normal and not coming forward to report it
- Recognise that sexual harassment and sexual violence, as well as other forms of child-on-child abuse, may be happening even if they are not reported
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

How we address child-on-child abuse within the curriculum and across the school

We use continuous, repetitive, and consistent teaching to support both victim and perpetrators.

Safeguarding in this context is not a one-off lesson. It is an ongoing, embedded part of the curriculum and daily life.

- **Social stories:** These are short, personalised narratives that describe a specific social situation and the expected behaviour. They use simple language and pictures to walk the child through a scenario, such as what to do if an unknown person tries to get them to keep a secret.
- **Role-playing:** Staff use puppets, dolls, or role-play with other trusted adults to act out safe and unsafe scenarios in a controlled and non-threatening way. This allows the child to practice their "no, go, tell" response in a safe environment.
- **Consistent language:** All staff, from teachers to lunchtime supervisors, use the same consistent language and rules. This prevents confusion and reinforces the message.
- **Specialised teaching curricular:** we use the SO Safe curriculum as part of our PSHE curriculum to address the needs of our pupils.

Staff stay highly alert to safeguarding concerns, knowing that some pupils may be unable to express worries or report abuse directly. Staff are proactive in noticing changes in behaviour, presentation, and interactions, and take every concern seriously, acting quickly to protect pupils. Staff understand and apply our safeguarding procedures consistently, ensuring pupils are supported and safeguarded even when they cannot communicate this themselves. Staff take responsibility for creating a safe space for pupils to express themselves and respond with care and vigilance to any signs of abuse, including child-on-child abuse

Additional vulnerabilities

We recognise that some pupils may be more vulnerable to child-on-child abuse than others. For example, pupils who have already experienced abuse, those that have special educational needs or disabilities (SEND), pupils living in care

and pupils who are LGBTQ+, may be more likely to face child-on-child abuse than other pupils. We recognise that girls are more likely to be the victims of child-on-child abuse than boys. Some pupils may face additional barriers to telling anyone about abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation. When addressing sexualised behaviours in pupils with severe learning needs, the primary goal is to manage the behaviour safely and effectively while teaching the child about appropriate conduct. This is a crucial part of a special school's safeguarding duty. The approach is not punitive, but rather educational and supportive.

Immediate response

The immediate response is to ensure the **safety and dignity of all individuals** involved.

- **Protect the child and others:** Intervene calmly and discreetly to stop the behaviour. Guide the child to a more private space and help them get dressed if necessary.
- **Avoid overreaction:** Staff must remain calm and not show shock or disgust. An overly emotional reaction can reinforce the behaviour, as the child may seek that kind of attention.
- **Follow safeguarding protocols:** Immediately inform the DSL and record the incident. This is vital for monitoring patterns and ensuring a consistent response.

Tailored, educational intervention

This is the long-term solution. The focus is on teaching the child about appropriate boundaries and social norms using methods they can understand.

- **Explicit Teaching:** Teach the child about **private and public** body parts and places. Use simple, concrete rules and visual aids. A child may be taught, "We touch our pants parts in the bathroom, not in the classroom".
- **Social Stories:** Create a personalised social story that explains the behaviour and the correct alternative. For example, a story might have pictures showing the child getting a hug from a staff member instead of touching their body.
- **The "PANTS" Rule:** Adapt the NSPCC's "PANTS" rule to the child's level of understanding. The focus can be on the "P" (privates are private) and "S" (speak up and tell a trusted adult).
- **Communication Training:** If the behaviour is a form of communication (e.g., for sensory needs or to get attention), teach the child alternative ways to communicate their needs. This could involve using PECS (Picture Exchange Communication System) or an augmentative communication device.

Collaboration and support

An effective strategy requires a team effort and a consistent approach.

- **Consistent Response:** All staff working with the child must use the same language and strategy to ensure the message is clear and reinforced consistently.
- **Parental Involvement:** Work closely with parents to ensure the same boundaries and language are used at home. This reinforces the learning and prevents confusion.
- **Multi-Disciplinary Team:** If the behaviour persists, involve specialists such as an occupational therapist, a speech and language therapist, or a behaviour analyst. They can help identify the root cause of the behaviour (e.g., sensory needs) and develop a more comprehensive plan.

Ongoing monitoring and review

The situation must be monitored to assess if the intervention is working and to adjust the approach as needed.

- **Data Collection:** Keep clear records of when and where the behaviours occur. This helps to identify triggers and patterns.
- **Regular Review:** The child's support plan should be reviewed regularly by the team to ensure the strategies remain relevant and effective.

How to report concerns

Our pupils

If a young person witnesses or experiences any form of child-on-child abuse, we strongly encourage them to speak to a trusted member of staff, parent or trusted adult about it. If a child discloses to an adult outside of school, the adult should contact the Designated Safeguarding Lead without delay to report the issue.

All victims will be taken seriously, regardless of how long it has taken them to come forward and they will be supported and kept safe. Abuse that occurs online or outside of the school will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting child-on-child abuse, including sexual violence or sexual harassment. A victim will never be made to feel ashamed for making a report or have their experience minimised.

In school, pupils can:

- Report to staff in class
- Report to the pastoral team
- Report to the senior team

- Report to the DSL's
- Report to the specialist school nursing team
- Report to external therapists
- Report to the healthcare support team

All of these methods can be used to report any form of harm or abuse, or can be used by pupils to share worried or concerns about any issue, including child-on-child abuse.

In the event that a pupil reports or discloses child-on-child abuse, we will take their report seriously, take prompt action to respond and to safeguard the child or children involved and we will ensure that we are listening to the voice of the child when deciding on the best course of action to take. We will always act in the best interests of children. Following any disclosures or reports of child-on-child abuse, we will review our school systems, training and policies to determine if any learning can be derived from the situation to further strengthen our approach to this issue. We will always encourage our pupils to safely express their views and give feedback on how they have been supported following a safeguarding concern.

Our staff

Any member of staff that has concerns about child-on-child abuse should follow the procedure set out in Section 10.4 and must report concerns immediately.

Others

We encourage everyone to report any form of abuse or harm perpetrated by or against our pupils. Any concerns should be reported to the Designated Safeguarding Lead, using the details in Appendix 3.

Wider concerns

We strive to create a safe and welcoming environment for all pupils. If you have any concerns about our culture of safeguarding, policy or procedures, please direct these to the safeguarding lead immediately, or follow our school Complaints Policy.

What happens when an allegation of child-on-child abuse is made?

We will adhere to Keeping Children Safe in Education (2025) when responding to incidents of child-on-child abuse. The school takes child-on-child abuse seriously and will respond to all concerns or disclosures of child-on-child abuse, including those that have occurred outside of school and online, immediately.

Upon receiving a concern, report or disclosure of abuse, the Designated Safeguarding Lead will decide what further action is necessary.

Our starting point regarding any report of child-on-child sexual harassment or violence should always be that there is a zero tolerance approach, it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

The subsequent action taken will vary depending on the type of child-on-child abuse and the severity of the incident/s disclosed. The Designated Safeguarding Lead will take contextual factors into account when managing the report.

The Designated Safeguarding Lead will always consider the following:

- The wishes of the victim in terms of how they want to proceed. The victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- The nature of the alleged incident(s), including: the level of coercion or threat, whether a crime may have been committed and consideration of harmful sexual behaviour;
- Both the chronological ages and developmental stages of the pupils involved;
- Any power imbalance between the pupils, including consideration of the age of pupils and whether pupils have special educational needs or disabilities;
- The impact on the victim;
- That sexual violence and sexual harassment can take place in intimate personal relationships between pupils;
- If the alleged incident is a one-off or a sustained pattern of abuse;
- If there are ongoing risks to the victim, other pupils, adult students or school or college staff; and
- Other related issues and wider context, such as links to child criminal or child sexual exploitation.

Depending on the nature of the incident/s, the Designated Safeguarding Lead may:

- Seek further information from those involved and witnesses.
- Undertake a risk assessment and needs assessment to ascertain steps necessary to safeguard the victim, alleged perpetrator, adults and other pupils.
- Decide to manage the concern internally.
- Organise a meeting with relevant staff and agencies to assess risk and agree a safety plan.
- Refer the victim and/or the perpetrator to local services for Early Help.

- Refer the case to Children’s Services via a MASH referral.
- Liaise with social workers working with pupils involved (if applicable).
- Make a report to the police.
- Liaise with specialist services.

In the event of a disclosure of child-on-child sexual violence, we will make an immediate risk and needs assessment. The risk and needs assessment will consider:

- The victim, especially their protection and support (this will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s);
- Whether there may have been other victims,
- The alleged perpetrator(s); and
- All the other pupils, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

More information about these options in relation to sexual violence and sexual harassment can be found in Part 5 of KCSIE (2025).

How we support victims of child-on-child abuse

The school recognises that child-on-child abuse has a significant impact on young people and victims are likely to need ongoing support. Pupils who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. Appropriate support will be put in place for victims of child-on-child abuse whilst investigation is taking place and following the initial - response. Support will continue for as long as it is needed and will be reviewed regularly to ensure the victim is receiving appropriate care. The school will do everything we can to maintain the victim’s normal routine. We will do everything we can to protect the victim from further bullying, harassment or abuse as a result of their disclosure.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.

If a victim of child-on-child abuse moves to a new setting, the Designated Safeguarding Lead will share the necessary information to ensure that support for the child continues.

How we will support alleged perpetrators and perpetrators of child-on-child abuse

We have a responsibility to safeguard and support all pupils. We will adhere to KCSIE (2025) when managing reports of child-on-child abuse and decide on action and support on a case by case basis.

The school has a responsibility to ensure that an alleged perpetrator continues to receive a suitable education and will consider a range of options in continuing educational provision if they are unable to attend school. Options may include:

- Providing tuition at home
- Working in a 1:1 setting in school
- Working in other trust spaces
- Using an external approved provider.

We recognise that pupils who perpetrate child-on-child abuse may be being abused themselves. The school will continue to safeguard the alleged perpetrator and provide them with support.

A plan to reduce the risk posed by the alleged perpetrator will be put in place as part of the risk assessment made following the alleged abuse. The DSL will take advice from children’s social care, specialist services and the police as necessary.

All risk and needs assessment and action plans whether internal or multi-agency will be reviewed and updated on a regular basis. If things do not improve or deteriorate the situation should be reconsidered

The school may choose to impose a sanction or punishment on the alleged perpetrator following an incident of child-on-child abuse. In this case, we will follow the school Behaviour Policy in determining the level and severity of sanction.

Where a child is cautioned or receives a conviction related to an incident of child-on-child abuse, the school will refer the KCSIE 2025 Part 5 for guidance.

If the alleged perpetrator moves to another setting, the Designated Safeguarding Lead will share information as necessary to safeguard the individual and other pupils at the new setting.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

How we will support other children who may have been affected by child-on-child abuse

We will offer tailored approaches dependent upon the needs of the individuals affected which may include:

- Whole class teaching
- Pastoral class support
- 1:1 intervention sessions
- Teaching structures such as social stories and comic strip conversations
- Refer to external professionals
- Counselling
- Mental Health support
- ELSA.

Local safeguarding arrangements and making referrals

The school adheres to local safeguarding arrangements, as outlined by the Northamptonshire Safeguarding Children Partnership.

For further details of how the school works with partner agencies in responding to safeguarding incidents (including incidents of child-on-child abuse), please see the main body of this policy.

Guardians

Guardians will be informed of incidents unless sharing information puts a child at greater risk of harm. Pupils will always be encouraged to speak to guardians about child-on-child abuse unless it puts them at greater risk of harm.

Whole school response

We will keep detailed records of any incidents of child-on-child abuse and will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will take appropriate action. Consideration will be given to whether there are wider cultural issues that enabled the inappropriate behaviour to occur and in order to minimise it happening again, we may:

- Dedicate more teaching time to a particular issue or topic
- Deliver additional staff training
- Use 1:1 intervention
- Pastoral support.

The DSL will refer to relevant assessment tools and guidance as appropriate such as:

- [Keeping Children Safe in Education \(2025\) part five](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [Searching, screening and confiscation at school](#)
- [Behaviour in schools](#)
- [School suspension and permanent exclusion](#)
- [Stop it Now Sexual Behaviours Traffic Light Tool](#)
- [NSCP Thresholds Document](#) (note: this is currently under review)
- **NSCP Safeguarding Children Procedures,**
- [When to call the police – guidance for schools and colleges.](#)

When appropriate the DSL may seek further advice from local or national safeguarding contacts.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries

- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in using the school visiting software.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to provide DBS information, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Contact the family
- Contact emergency contacts
- Refer to MASH.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Contact the family
- Contact emergency contacts
- Contact external agencies.

Appendix 3 - Important Contacts

| ROLE/ORGANISATION | NAME | CONTACT DETAILS |
|--|---|---|
| Designated Safeguarding Lead (DSL) | Samantha Sawyer (Red Kite) | 01536 216489 / 07365 853061 |
| | Alison Everitt (Kingsley) | 01536 316880 / 07886 173757 |
| Deputy DSL's | Karen Smith (Headteacher) Rachel Travers Suzy Geraghty Nikki Bowskill Kate Seaton Debbie Smith | 01536 216489 |
| | Ben Campbell-Kemp (Headteacher) Bev Williams Amanda King Dionne Tomlinson Louise Adamson Sarah Pywell Gemma Underwood | 01536 316880 |
| Designated Teacher for Looked After Children (DTLAC) | Suzy Geraghty (Red Kite) | 01536 216489 |
| | Bev Williams (Kingsley) | 01536 316880 |
| Local authority designated officer (LADO) | Andy Smith Sheila Kempster | 07850 854309 07831 123193 LADOConsultations@NCTrust.co.uk |
| Chair of Governors | Tony McKenna | 01536 316880 |
| Safeguarding Governor | Debbie Withers | 01536 316880 |
| Channel helpline | | 0207 340 7264 |