Child protection and safeguarding policy (including safer recruitment, allegations against staff and low-level concerns)

The PRIDE Academy

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Orchard Hill College Academy Trust

The PRIDE Academy

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1. Aims

The school aims to ensure that:

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

The PRIDE Academy is part of Orchard Hill College Academy Trust (OHCAT). As a family of specialist education providers, OHCAT recognises that children and young people with SEND may be especially vulnerable to abuse, and that additional barriers can exist when recognising abuse and neglect in this group of children and young people. All of our working practices are designed to maximise opportunities for our pupils and students: to learn how to be and keep safe; to communicate and be understood through whichever means of communication is most effective for them; to build healthy and enriching relationships; to maximise their potential and achieve ambitious goals within their local communities. Safeguarding training delivered to all staff emphasises the need to stay alert to indicators of possible abuse, avoiding assumptions around changes in a child's behaviour or presentation relating solely to their additional needs, and understanding how communication barriers might impact on the presentation of possible abuse indicators.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education and Working Together to Safeguard Children. 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:

- Part 3 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/students 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 (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), 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 age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This

means our governors and Principal should carefully consider how they are supporting their pupils/students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils/students (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils/students. 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/student outcomes. Some pupils/students may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse

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

3. Definitions

Safeguarding and promoting the welfare of children means:

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

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

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

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

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children includes everyone under the age of 18.

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 an area in the LA area

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

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. On this basis, OHCAT uses the terms 'those harmed' and 'those that have harmed'.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and 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 14)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing young people for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, transphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. 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 they're always unacceptable

5.1 All staff

All staff will:

- Maintain an attitude of "it could happen here" in order to remain vigilant to the possibility of abuse and ensure that any and all safeguarding concerns, including low level concerns, are reported and acted upon in the appropriate manner.
- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (KCSIE) in full, and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (for example, sites they need to visit or who they'll be interacting with online).
- Create a culture where students, including those who identify as lesbian, gay, bisexual, transgender (LGBT) or are gender questioning, feel safe, can speak out and share concerns.
- Maintain professional relationships with students at all times. No attempt should be made to build or encourage any friendship with current **or** former students or their families outside of work. This includes telephone and personal contact and connecting via social media.
- Ensure that any and all correspondence with students and their families is via OHCAT systems. Staff must not give their personal contact details to students including e-mail, home or mobile telephone numbers
- Adhere to appropriate confidentiality.
- Engage in regular safeguarding and related training, including on whistle-blowing procedures and online safety, to ensure they understand the school and OHCAT's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.
- Actively uphold the expected values of respect, tolerance, compassion and integrity, and model these values through their behaviour.

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the Designated Safeguarding Lead (DSL) and wider Safeguarding team, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education/who are absent from education.
- The school's unauthorised absence procedures and children missing education procedures
- 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
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
  - Drug taking and/or alcohol misuse
  - Unexplainable and/or persistent absences from education
  - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
  - Consensual and non-consensual making or sharing of nudes or semi-nudes
- 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 children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 4 of this policy outlines in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is **Clare Bailey**. 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/students safe online. Though some of the duties inherent to this role can and will be delegated to the deputy DSL in order that work is completed most efficiently, **the ultimate responsibility remains with the DSL**.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

You can contact the DSL via the telephone number or email address given on the Contact page of this policy and on the Safeguarding page of our website.

When the DSL is absent, the deputy DSLs will act as cover. Details of our Safeguarding team, including names and contact details, can be found at the start of this policy and on the Safeguarding page of our website.

Cover arrangements are in place for outside of term time and when the DSL or deputies are absent. This includes:

- Emailing the school's Safeguarding address: safeguarding-TPA@theprideacademy.co.uk
- Contacting OHCAT head office: 0345 402 0453 or enquiries@ohcat.org

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), 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.

The DSL will also:

- Keep the Principal informed of any issues.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Oversee the Safeguarding Team, which may include deputy DSLs, site DSLs for any satellite sites and/or Mental Health Leads.
- Lead/attend weekly safeguarding risk and review meetings to ensure that all safeguarding concerns are effectively managed.
- 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 children 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 children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- Ensure that child protection files are kept up to date.
- Where children leave the school, ensure their child protection file is transferred to the new school.
- Embed a contextual safeguarding approach within the school, working to ensure that environmental and social factors that may impact upon students' welfare and safety are understood, considered and communicated to any safeguarding partners as necessary.
- Lead on the development, review and implementation of the school's Safeguarding and Wellbeing Offer, in liaison with senior leaders, staff, students and governors.

The full responsibilities of the DSL and deputy DSLs are set out in their job description.

5.3 The Local Governing Body (LGB)

The LGB 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.
- Ensure that all staff read *at least* part 1 of Keeping Safe in Education (KCSIE).
- Hold the Principal to account for the implementation of this and related policies.
- 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 safeguarding link governor to monitor the effectiveness of this policy in conjunction with the full LGB. 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 the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils/students.
- Ensure the school has appropriate cyber security systems in place.
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness at least once every academic year. 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.
    - Ensuring that reviews are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept.
    - 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.
- 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, trainee teachers, volunteers and contractors). Appendix 3 of this policy covers this procedure.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children 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.

All governors will read Keeping Children Safe in Education (KCSIE) in its entirety.

Section 19.3 of this policy has information on how governors are supported to fulfil their role.

5.4 The Principal

The Principal 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.

    - Undertake safeguarding and child protection training at induction and with regular refreshers thereafter, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.
- Communicating this policy to parents/carers when their child joins the school and 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 (see appendix 3).
- Making decisions regarding all low-level concerns – they may choose to collaborate with the DSL on this.
- Ensuring that opportunities are maximised to deliver preventative education to pupils/students and families around safeguarding issues via the curriculum and whole school culture.
- Ensuring that relevant checks are made on any organisation wishing to hire school premises, to ensure that all necessary safeguarding procedures are in place.

5.5 Virtual school heads

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

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

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

6. Confidentiality

The PRIDE Academy has clear processes and principles for sharing information within the school, within OHCAT, and with the three safeguarding partners and other agencies as required.

Timely information-sharing is essential to effective safeguarding. Arrangements are in place for information-sharing within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, 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; or if to gain consent would place a child at risk.

Staff will never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests. If a pupil/student discloses abuse but asks the school not to tell anyone about it:

- 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 child's wishes against their duty to protect the child and other children, taking into consideration that:
    - Parents or carers should normally be informed (unless this would put the child at greater risk).
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

Regarding anonymity, all staff will:

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

The government's information sharing advice for safeguarding practitioners includes seven 'golden rules' for sharing information (including personal information) and will support staff who have to make decisions about sharing information. If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

Where a child leaves the school, the DSL will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving.

Confidentiality is also addressed in this policy with respect to record-keeping in section 18, and allegations of abuse against staff in appendix 3.

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for early help, particularly where a child may have additional vulnerabilities, for example:

- Has a disability or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan).
- Has a mental health need.
- Is a young carer.
- Is pregnant and/or is a parent themselves.
- Has exhibited early signs of abusive, violent and/or harmful behaviours.
- Is bereaved.
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from education, care or home.
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit.
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation.

- Is at risk of being radicalised into terrorism.
- Has a parent or carer in custody, or is affected by parental offending.
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol.
- 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.

Staff may become aware of abuse in a number of ways, including:

- Disclosure by a pupil/student
- Disclosure or remarks made by another party (e.g. carer, other professional, member of the public)
- Discovery of bruising or marks on a pupil/student's body
- Unexplained changes in behaviour or personality
- Evidence of disturbance or explicit detail in drawing, writing or play
- Evidence of neglect in terms of cleanliness, personal hygiene, failure to thrive or apparent exposure to unnecessary risks
- Persistent lateness, poor or irregular attendance or persistent and/or unexplainable absence from school

However, it is important to remember that abuse may not always become apparent through direct disclosure or 'obvious' indicators, but through an accumulation of small incidents or concerns that form a pattern. Some pupils/students may not feel ready or know how to talk about abuse, not recognise their experiences as harmful, or feel embarrassed, humiliated or threatened; however, this should not stop staff from having a 'professional curiosity' and speaking to the DSL if they have concerns about a pupil/student. It is therefore essential that any and all concerns, including low level concerns, are reported to the DSL and/or Principal so that they can be recorded and acted upon as necessary.

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.
Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

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

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. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

In Hillingdon referrals are made through the Multi-Agency Safeguarding Hub (MASH).

You can also report child abuse to your local council via the GOV.UK webpage:
https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to you

All pupils/students at The PRIDE Academy must be able to place their trust and confidence in any adult working in the school. They must feel sure that they can speak about any worries or concerns

they may have and that they will be listened to, taken seriously and responded to appropriately. There are clear processes in place at The PRIDE Academy detailing who students can speak to, how their concerns will be acted upon and followed up; these processes are displayed around the school and regularly publicised to students via channels such as assemblies and tutor time.

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them, without judgement or interruption. 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 child 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.
- Report your conversation to the DSL or deputy DSL immediately following the disclosure. Do not delay reporting until the written record is complete.
- Write up your conversation as soon as is practicable after the fact, but no later than with 24 hours, in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Record your write-up on CPOMS and notify the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), 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.

It is important to remember that abuse may not always become apparent through direct disclosure or 'obvious' indicators, but through an accumulation of small incidents or concerns that form a pattern. 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.

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

7.3 If you discover that FGM has taken place or a pupil/student is at risk of FGM

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

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

Possible indicators that a pupil/student has already been subjected to FGM, and factors that suggest a pupil/student may be at risk, are set out in appendix 4 of this policy.

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. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil/student under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil/student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils/students.

Any member of staff who suspects a pupil/student is at risk of FGM or suspects that FGM has been carried out, or discovers that a pupil/student aged 18 or over appears to have been a victim of FGM, should speak to the DSL and follow our local safeguarding procedures.

7.4 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)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

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. 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.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

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

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

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.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority should 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. 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.

If the child'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 child's situation improves.

7.5 If you have concerns about extremism

If a child 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.

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' above). Inform the DSL or deputy as soon as practically possible after the referral.

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.

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/student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

7.6 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

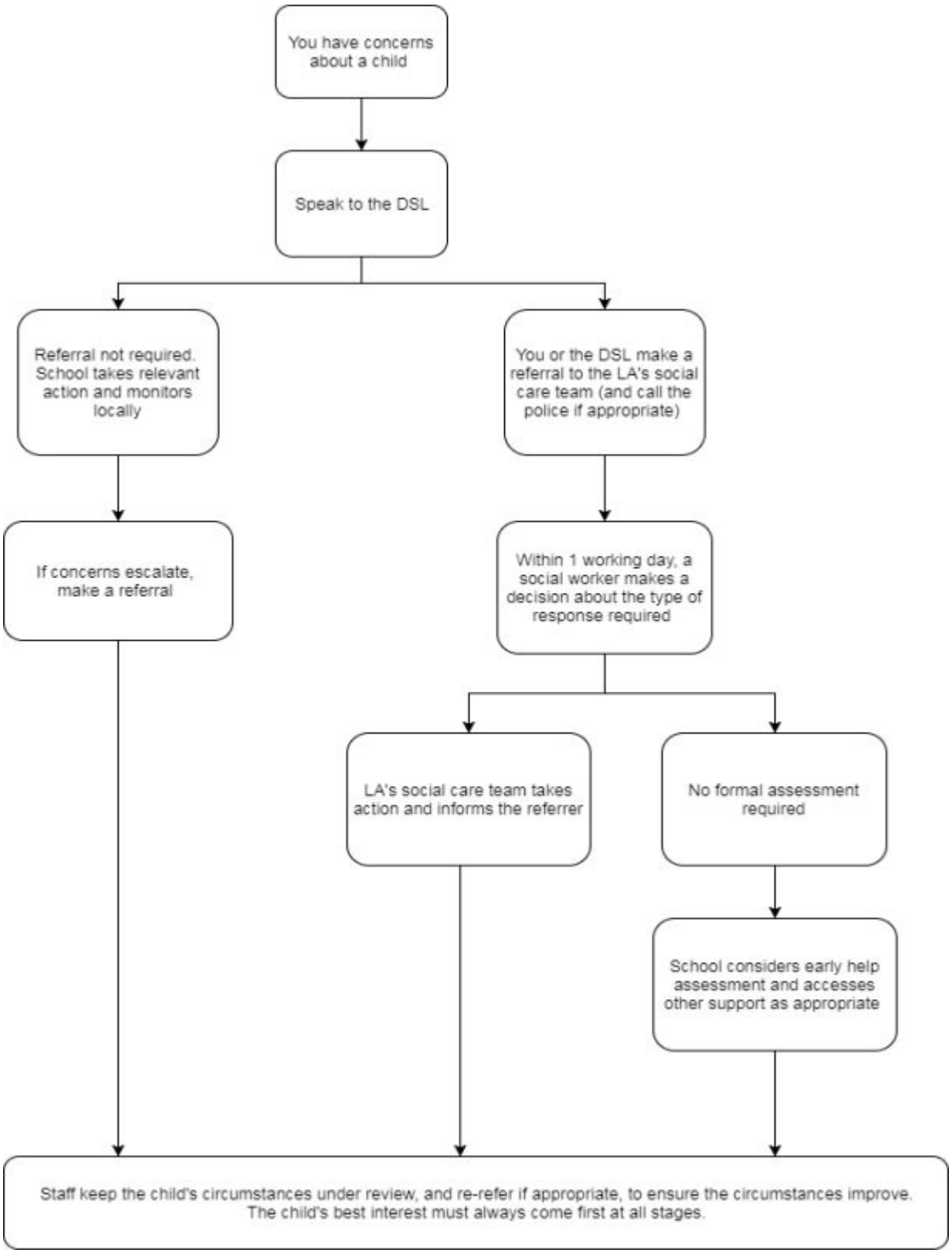
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL and/or the Mental Health Lead to agree a course of action.

For more information, please refer to the Student Mental Wealth, Health and Wellbeing Policy (available on the Policies page of our website) and Department for Education guidance on mental health and behaviour in schools.

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 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the Principal as soon as possible. If the concerns/allegations are about the Principal, speak to the Chair of Governors and the OHCAT Executive Director of Quality & Safeguarding.

The Principal/ Chair of Governors and Executive Director of Quality & Safeguarding will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the Principal, report it directly to the local authority designated officer (LADO).

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, informing the LADO, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other pupils/students

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

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys will be perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence
- Could put pupils/students in the school at risk
- Is violent
- Involves pupils/students 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 making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

See appendix 4 for more information about child-on-child abuse.

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

If a pupil/student makes an allegation of abuse against another pupil/student:

- 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. It is possible that social care services are already aware of safeguarding concerns around the student.
- Where neither social care services nor the police accept the complaint, a thorough school investigation will take place in any case, using our internal procedures.
- Appropriate measures will be taken on a case-by-case basis to safeguard pupils/students involved in the allegation; this might include restructuring timetables to ensure that those

involved can access their learning without sharing classrooms or other physical space, offering therapeutic support, or offering an offsite timetable if the pupil/student feels unable to be onsite. Where necessary or appropriate, fixed term exclusions may be given to those involved in the allegation; this will be done in line with OHCAT and school policies including Behaviour, Suspension and Permanent Exclusion and/or Anti-Bullying. Where necessary we will liaise with the police and/or social care to ensure that any internal processes do not prejudice an ongoing external investigation.

- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering 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 children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Where a complaint is found not to raise a safeguarding concern, the Senior Leadership Team will work with the pupil/student and any other pupils/students or staff involved to investigate and resolve the matter in a positive and constructive way. All complaints and concerns raised by pupils/students will be listened to and acted upon, and the outcome clearly communicated to those involved.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils/students, and initiation or hazing-type violence with respect to boys.
- Ensure our curriculum helps to educate pupils/students about appropriate behaviour and consent.
- Ensure pupils/students are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below).
- 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.
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment.
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupil/student attitudes.

- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
    - That even if there are no reports of child-on-child abuse in 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 child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to.
        - A friend may make a report.
        - A member of staff may overhear a conversation.
        - A child's behaviour might indicate that something is wrong.
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
    - That a pupil/student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
    - That they should speak to the DSL if they have any concerns.
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.
    - That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL.

7.9 Making or sharing of nudes and semi-nudes

Our approach is based on guidance from the UK Council for Internet Safety and Department for Science, Innovation and Technology for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You **must not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil/student 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/student to delete it.
- Ask the pupils/students 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 pupils/students it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the pupils/students that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate 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 pupils/students.
- 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 young person (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/students involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils/students involved (in most cases parents/carers should be involved).

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

- The incident involves an adult. 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 4 for more information on assessing adult-involved incidents.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent.
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The imagery involves sexual acts and any pupil/student in the images or videos is under 13.
- The DSL has reason to believe a pupil/student is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the Principal 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.

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the school's safeguarding Team. The DSL will contact the community policing team for the designated area. Where appropriate the DSL will make reports through 101 via telephone or the police reporting online contact. When deemed an emergency the safeguarding team will contact 999.

Recording incidents

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

Curriculum coverage

Students are taught about the issues surrounding the making or sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching is delivered in an age- and stage-appropriate manner and 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. This also includes making such images, including where generated by AI.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

Students also learn the strategies and skills needed to manage:

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

In addition to this, students are taught about relationships and sexual education through our tutor programme which will cover pertinent areas on consent, healthy relationships and respect. These can be found in the PSHE learning journey in which topics are visited in a cyclical manner considering students' individual Special Educational Needs, Age and contextual circumstances. The DSL works closely with external agencies such as Brook and Kiss who will deliver small group interventions or targeted sessions. The staff team at The Pride Academy complete rigorous training to ensure they are up to date with new and emerging guidance in KCSIE, RSE and SMSC to ensure that they can support students through small group interventions alongside the curriculum.

This policy on the making or sharing of nudes and semi-nudes is also shared with pupils/students so they are aware of the processes the school will follow in the event of an incident.

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.

7.10 Reporting systems for our pupils/students

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

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

To achieve this, we will:

- Operate clear and effective systems to enable pupils/students to communicate that they feel safe or unsafe, and ensure that all such concerns are followed up with appropriate action.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils/students.
- Make it clear to pupils/students that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- Listen and respond to pupils/students and value all forms of communication, including non-verbal, assistive and augmentative communication, and behaviour, including behaviours of concern.

Pupils/students are kept informed of their options to raise complaints, concerns and make safeguarding disclosures. Details of the safeguarding team at The PRIDE Academy are clearly displayed around the school building, along with details of the NSPCC helpline, Report Abuse in Education – this is for children and young people who have experienced abuse at school and for worried adults who need support and guidance around such abuse. The helpline can be contacted on 0800 136 663 or via email: help@nspcc.org.uk

8. Online safety and the use of mobile technology

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

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils/students, 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 for the whole school community, including the expectation that our school is a mobile phone-free environment by default.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories;
- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, 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** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

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

- Educate pupils/students 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/students are encouraged to do so, including where they're a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils/students are not present.
  - Staff **must not** take pictures or recordings of pupils/students on their personal phones or cameras.
- Make all pupils/students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the consequences if a pupil/student is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, pupils/students and parents/carers are aware that staff have the power to search pupils/students' 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.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Carry out an annual review of our filtering and monitoring effectiveness. This will be conducted by Reece Nidholls] with the support of our DSL and IT support.
- Provide regular safeguarding and children 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.

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 mobile phone policies which can be found on the Policies page of our website.

8.1 Artificial intelligence (AI) and cyber resilience

Generative artificial intelligence (AI) tools are now widespread and easy to access. Pupils/students, parents/carers and staff may be familiar with generative chatbots such as ChatGPT and Google Gemini.

The PRIDE Academy recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils/students. However, AI may also have the potential to facilitate abuse (for example, bullying and grooming) and/or expose pupils/students to harmful content.

Staff are trained to understand the opportunities and risks associated with AI tools, including:

- The potential for AI-generated content to be misleading, harmful or inappropriate.
- Risks related to deepfakes, synthetic media, and automated grooming or exploitation.
- The importance of critical digital literacy when engaging with AI-powered platforms.

Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education (KCSIE). Our filtering and monitoring systems are regularly reviewed to ensure they are robust against emerging threats, including:

- AI-enhanced phishing and scams
- Automated content manipulation
- Unregulated AI chatbots or tutoring platforms

Staff receive regular updates and training on cyber resilience, including:

- Safe use of AI tools in teaching and learning
- Identifying and responding to AI-related safeguarding concerns
- Ensuring student data privacy and protection in AI-integrated systems

We are committed to maintaining a secure digital environment where students can benefit from technological innovation while being protected from harm.

The PRIDE Academy will treat any use of AI to access harmful content or bully pupils/students in line with this policy and our anti-bullying and behaviour policies.

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

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

- Meet with the victim's parents or carers, 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 parents or carers to discuss support for them, and what's being put in place that will impact them, for example, moving them out of classes with the victim, and the reason(s) behind any decision(s).

Working with families

Keeping relevant, up-to-date and accurate information about our pupils/students is a key aspect of effective safeguarding. We will regularly ask all families to provide us with the following information and to notify us of any changes that occur:

- Names and contact details of persons with whom the pupil/student normally lives
- Names and contact details of all persons with parental responsibility
- Names and contact details of at least three emergency contacts for the pupil/student
- Details of any persons authorised to collect the pupil/student from school (if different from above)
- Any relevant court orders in place including those which affect any person's access to the pupil/student (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- Name and contact detail of the pupil/student's general practitioner
- Any other factors which may impact on the safety and welfare of the pupil/student

Information about pupils/students given to us by the pupils/students themselves, their parents or carers, or by other agencies will remain confidential. Staff will be given relevant information only on a "need to know" basis in order to support the pupil/student if that is necessary and appropriate.

We are, however, under a duty to share any information which is of a child protection or safeguarding nature, as noted in Keeping Children Safe in Education which states "The data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children." We understand that this duty applies to both children and vulnerable adults, and that information sharing in this context is in the best interests of the pupil/student and overrides any other duties we have regarding confidentiality and information sharing.

If we have a reason to be concerned about the welfare of a pupil/student we will always seek to discuss this with the pupil/student's family in the first instance, subject to the conditions laid out in our Safeguarding Procedure. On occasion, according to the nature of our concern, it may be necessary for us to make an immediate referral to social care services when to do otherwise may put the pupil/student at risk of further harm either because of delay, or because of the actions of parents or carers.

10. Special educational needs, disabilities or health issues

We recognise that pupils/students with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. 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 child's condition without further exploration.
- Pupils/students being more vulnerable to peer group isolation or bullying (including prejudice-based bullying) than other pupils/students.
- The potential for pupils/students with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication or cognitive differences impacting a child's ability to recognise or report abuse or increasing the risk of harm from a situation or relationship.
- The need for intimate care or that these children are isolated from others.
- That these children are more likely to be dependent on adults for care.

As a specialist provider, all of our working practices are designed with an awareness of these additional vulnerabilities. Safeguarding training delivered to all staff emphasises the need to stay alert to indicators of possible abuse, avoiding assumptions around changes in a child's behaviour or presentation relating solely to their additional needs, and understanding how communication barriers might impact on the presentation of possible abuse indicators.

11. Pupils/students with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

12. Young carers

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

13. Pupils/students with a social worker

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

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

Where we are aware that a pupil/student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil/student'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.

14. Looked-after and previously looked-after children

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

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

We have appointed a Designated Teacher for Looked-After Children, **Reece Nicholls**, 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.

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 and previously 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.

15. Pupils who are lesbian, gay or bisexual

The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils/students who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our behaviour and anti-bullying policies for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL.

16. Pupils/students who are questioning their gender

16.1 Supporting pupils/students who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We recognise the importance of respecting the rights of people in relation to protected characteristics, including both gender and religion/belief. We will take a strong, proactive stance on all forms of bullying or discrimination, including any such incidents based on gender. See our behaviour policy for more detail.

When supporting a pupil/student questioning their gender, we will take into account the principle of taking a careful approach. The DSL will lead in these cases.

16.2 Involving parents/carers in cases of pupils/students questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil/student at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

16.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil/student or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil/student presenting as the opposite biological sex (“social transition”), we will work together

with the pupil/student and parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes.
- Parents and carers should be actively involved and their views treated with importance: except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry weight and be properly considered.
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes.
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition.

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

16.4 Rules on single-sex spaces

Pupils/students are not allowed into toilets, changing rooms or showers designated for the opposite biological sex, with no exceptions.

16.5 Rules on single-sex sports

The school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils/students must not be allowed to participate in sports designed for the opposite sex.

17. Complaints and concerns about school safeguarding policies

17.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

17.2 Other complaints

We are committed to dealing with complaints promptly, fairly and carefully. We encourage parents, carers and other members of the school community to raise (on an informal basis) any concerns they have at the earliest opportunity. In most instances, this will involve speaking directly with the member of staff concerned, who will try to resolve the issue as quickly as possible.

Any member of the school community can contact us:

- By letter – The PRIDE Academy, Falling Lane, Yiewsley, West Drayton, Middlesex UB7 8AB
- By email – info@theprideacademy.co.uk
- By telephone – 01895 446 747
- Or in person, after making an appointment

In order to deal with a complaint effectively, we need to know what has happened, when it took place, who was involved and what the desired resolution might be. Anyone requiring assistance in raising a complaint should let the school know so we can put appropriate support arrangements in place.

The school has a formal Complaints Policy which can be accessed via the Policies page of our website.

17.3 Whistleblowing

Whistleblowing is raising a specific concern(s) of wrongdoing that is 'in the public interest'. Examples of whistleblowing include (but are not limited to):

- Criminal offences, such as fraud or corruption.
- Pupil/student or staff health and safety being put in danger.
- Failure to comply with a legal obligation or statutory requirement.
- Breaches of financial management procedures.
- Damage to the environment.
- Attempts to cover up any of the above, or any other wrongdoing in the public interest.

A whistleblower is a member of staff who raises a genuine concern, known as a protected disclosure, relating to the above.

Where a concern falls under the definition of whistleblowing, this should be made in writing wherever possible. A whistleblowing concern should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter. Staff should send the concern to one of the named contacts noted in the Whistleblowing Policy via governance@ohcat.org. If a concern is received by another staff member, they should pass it on to one of the named contacts without delay.

Please refer to the Whistleblowing Policy for more details. This can be accessed on the Policies page of our website.

18. Record-keeping

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, etc. If there is any doubt about whether to record something, you must discuss it with the DSL.

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

The school uses an electronic system, CPOMS, for recording safeguarding incidents and concerns. Access to records is controlled via permissions: all staff can make a report via the system but can only see the reports they have made. The DSL and Safeguarding Team have full access to reports and student records.

When reporting an incident or concern, whether via CPOMS or in person, the person reporting must make an accurate written report of what they have observed or what their concern is. This must be submitted to the DSL who will make any necessary additional notes.

The DSL (or a member of the Safeguarding Team at the request of the DSL) will complete the school's referral form or, in the case of an ongoing concern, add to the existing one.

All safeguarding emails sent outside of OHCAT must be encrypted.

Where it is determined that Social Services must be contacted about an allegations or suspicions of abuse, this will usually be done by the DSL. In making contact with Social Services or the Police, the caller must note that the issue is one of suspected abuse or a suspected crime against a child or vulnerable adult.

Written statements and the school's referral form must be provided by the school to Social Services or, if appropriate, the Police, including the details of allegations/incidents observed. These must be provided as soon as possible, preferably on the same day. Copies must be provided to the DSL immediately.

The person reporting the incident (unless otherwise agreed by the Safeguarding team, the DSL) will contact the individual's named care manager or, if they do not have one, the duty manager.

All records relating to student welfare concerns will be retained on CPOMS. Where hard copies of records are kept, these will be in a safeguarding file held separately from the student's main file. Hard copy safeguarding files will be held in lockable storage accessible only to the Principal and the DSL, and clearly marked as 'Confidential – for attention of the Designated Safeguarding Lead'.

Information from records will only be used on a 'need to know' basis.

Relevant staff will be made aware when a student is subject to a Child Protection Plan, so they can monitor the student's welfare.

Records relating to the student's welfare will remain on the student's file as long as that person is a student at the school.

If a student 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 student file.

To allow the new school/college to have support in place when the student 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

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 child.

Safeguarding data reports must be provided to the OHCAT Executive Senior Leadership Team (ESLT) monthly and to governors termly.

We will hold records in line with our records retention schedule.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

19. Training

19.1 All staff

All staff members will undertake safeguarding and child protection training at induction and not less than annually thereafter, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training and any related guidance will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the 3 safeguarding partners.
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment.
    - Have a clear understanding of the needs of all pupils/students.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

All staff must read and sign at least Part 1 of the latest version of Keeping Children Safe in Education, upon commencing employment and whenever the guidance is updated.

Upon induction, staff are required to read all safeguarding related policies and procedures, and to sign and date to confirm that they understand their roles and responsibilities with regard to safeguarding. Staff are also required to read these policies and procedures whenever they are updated, and sign and date to indicate that they have done so.

Other mechanisms include, but are not limited to:

- safeguarding induction, including safeguarding learning walks to help assess the impact of training and to identify support needs

- whole school annual safeguarding training
- whole organisation safeguarding training looking at specific safeguarding issues (e.g. child on child abuse) with a focus on safeguarding young people with additional needs
- online safeguarding training including modules with specific focus (e.g. child on child abuse), with online exam questionnaires
- safeguarding quizzes
- safeguarding refresher workshops, which are held on the majority of training days
- staff team involvement in the development and maintenance of each provision's Safeguarding and Wellbeing Offer, ensuring that all staff understand and engage with the practice of safeguarding as it threads through every area of school or College life, including curriculum delivery, pastoral care, careers education and relationships with families
- regular contact between safeguarding link governors and Principals/DSLs
- emails to staff regarding key issues, updates and individual early help plans
- all recruitment being conducted in accordance with Safer Recruitment practices
- clear expectations for all staff around acceptable use of technology in accordance with the Staff Code of Conduct and the IT Acceptable Use Policy – staff understand that they must not use their personal devices around students or to take photographs of students, and that they must not divulge their personal contact details or connect with students on social media

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

19.2 The DSL and deputies

The DSL and deputies will complete Level 3 safeguarding training in order to undertake their roles. This training will be updated at least every two years. They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

Additional CPD will include attendance at monthly meetings of OHCAT's in-house professional network for DSLs, the annual OHCAT Safeguarding conference and mandatory face to face training throughout the academic year. DSLs will receive regular supervision (not less than termly) from the OHCAT Safeguarding & Wellbeing team.

19.3 Governors

All governors will receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated thereafter. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

19.4 Recruitment – interview panels

At least 1 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, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

19.5 Staff who have contact with pupils/students and families

All staff who have contact with children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

20. Use of alternative provision

We recognise the importance of safeguarding pupils/students placed in alternative provision (AP). To ensure the safety and wellbeing of all pupils/students, the following procedures are in place:

- Our school retains responsibility for any pupil/student on roll who is placed in alternative provision. Where an AP placement is proposed, the Senior Leadership Team will assure themselves that the placement meets the educational and broader needs of the pupil/student to a sufficiently high standard.
- Written safeguarding assurances must be obtained from all AP providers prior to placement, confirming that the provider has appropriate safeguarding policies, procedures, safer recruitment/vetting and staff training in place.
- Information-sharing between our school and the AP will be conducted in accordance with the principles set out in Section 6.
- AP providers will be visited not less than half termly by a member of the school's Senior Leadership Team as part of regular quality monitoring and safeguarding assurance check, and a written report completed.
- Individual placements will be reviewed during safeguarding risk and review meetings to assess the suitability, safety, and progress of the student. Reviews will include input from the AP provider, the student, and relevant school staff.
- Attendance at AP sites will be tracked daily. Any unexplained absences or patterns of concern will trigger immediate follow-up.
- If any safeguarding concerns arise during a placement, immediate action will be taken. This may include contacting the AP provider, the student's parents/carers, and relevant safeguarding authorities.
- All AP arrangements will be documented and monitored by the DSL.

21. Monitoring arrangements

This policy will be reviewed **annually** by the OHCAT Executive Director for Quality & Safeguarding. At every review, it will be approved by the OHCAT Quality, Standards & Safeguarding Committee (QSSC) or (for out-of-cycle updates requiring expedited approval) the Chair of OHCAT Trustees plus the Chair of QSSC.

22. Related policies and procedures

This policy links to the following policies and procedures:

Allergen and Anaphylaxis Policy
Anti-Bullying Policy
Anti-Radicalisation Policy
Attendance Policy
Behaviour Policy
Complaints Policy and Procedure
Conflict of Interest Policy
Data Protection Policy
Dignity at Work Policy
Educational Visits Policy
Equality, Diversity & Inclusion Policy

Fire Prevention Policy and Procedures
First Aid Policy
Health and Safety Policy
Information and Records Retention Policy
IT Acceptable Use Policy
Lone Working Policy
Missing Child Policy
Mobile Phone Policy
Online Safety Policy
Personal and Intimate Care Policy
Privacy Notices
Recruitment and Selection Policy
Relationships and Sex Education Policy
Risk Assessment Policy
Safeguarding and Wellbeing Offers (local and overarching)
Safeguarding Supervision Policy
Safer Recruitment, Compliance Checks and Single Central Record (SCR) Policy
Social Media Policy
Staff Code of Conduct
Substance Misuse Policy
Supporting Students with Medical Conditions in Education Policy
Suspension and Permanent Exclusion Policy
Staff Mental Wealth, Health and Wellbeing Policy
Student Mental Wealth, Health and Wellbeing Policy
Visiting Speaker Policy
Whistleblowing Policy

Appendix 1: types of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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 cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
- Verbal abuse such as criticism, belittling, or name-calling.

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

- Physical contact, including assault by penetration (for example, rape or penetration with an object) 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.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

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 caregivers).
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

It is important to recognise the multitude of abusive situations that overlap within these definitions. Children and vulnerable adults may be at risk of abuse through such varied issues as bullying (including cyberbullying), substance misuse, child criminal or sexual exploitation, female genital mutilation, breast ironing, forced marriage, radicalisation and extremist behaviour, abuse related to protected characteristics e.g. racism/sexism/homophobia, domestic abuse, serious violence (including that linked to CCE), sharing of nude or semi-nude images, and others.

It is also important to recognise that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), child criminal and/or sexual exploitation, gender based violence/sexual assaults and sharing of nude or semi-nude images, including AI-generated images. All staff must remain alert to the possibility of child on child abuse and take appropriate action to safeguard those involved, in line with this procedure.

Appendix 2: safer recruitment, DBS checks and disclosure

This section provides an overview of our safer recruitment process. For full details, please refer to the Recruitment & Selection Policy and the Safer Recruitment, Compliance Checks and Single Central Record (SCR) Policy, which are available from the Policies page of our website.

Recruitment to OHCAT schools is always conducted in accordance with Safer Recruitment procedures. Key points:

- Every interview panel has at least one member who is Safer Recruitment trained.
- All roles are advertised with clear information regarding our commitment to safeguarding and promoting the welfare of children and young people.
- Shortlisting will always involve at least two people and will consider any inconsistencies, look for gaps in employment and reasons given for them, and explore all potential concerns.
- References will be sought prior to interview; any concerns raised will be explored further with referees and taken up with the candidate at interview.
- Online searches will be carried out on shortlisted candidates, to identify any publicly available information that may be relevant to a candidate's suitability to work with children, young people or vulnerable adults.
- Interviews will probe candidates' employment history, including any gaps or inconsistencies, and explore any potential areas of concern to determine the candidate's suitability to work with children.

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we will retain a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check:
    - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available.
    - Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - For all staff, including teaching positions: criminal records checks for overseas applicants

  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state.

*Management positions are most likely to include, but are not limited to, Principals and Deputy/Assistant Principals.

Regulated activity means a person who will be:
- Responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or
- Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once

No individual may commence work until all required checks have been completed, verified, assessed as satisfactory and recorded on the Single Central Record (SCR).

If there is a delay in receiving a DBS disclosure the Principal has discretion to allow an individual to begin work pending receipt of the disclosure certificate. **This will only be allowed if all other checks, including a clear check of the Children and Adults' Barred List (where the position amounts to regulated activity) and receipt of satisfactory references, have been completed and once appropriate supervision has been put in place.** A risk assessment must be completed and signed prior to the start of employment. Final authorisation is required by OHCAT HR in consultation with the Executive Director for Quality & Safeguarding.

Existing staff and volunteers

In certain circumstances we will carry out all the relevant checks on existing staff or volunteers as if the individual was a new member of staff or a new volunteer. These circumstances are when:
- There are concerns about an existing member of staff's or the volunteer's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

This duty applies equally to paid staff and volunteers where they were engaged in regulated activity.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors, or request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school.
We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never allow an unchecked volunteer to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Governors, Trustees and Members

All trustees, local governors and members will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The Chair of the Board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). NB: Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.
- Identity.
- Right to work in the UK.
- Other checks deemed necessary if they have lived or worked outside the UK.

Adults who supervise pupils/students on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil/student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils/students staying with host families

Where the school makes arrangements for pupils/students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Declarations of Interest

All staff are required to complete a Declaration of Interest upon commencing employment and annually thereafter, in order to declare any personal or professional relationships or interests that may have bearing on their work. Where a declared interest or connection may have implications around conflict of interest or the safeguarding of children or vulnerable adults, relevant OHCAT teams and/or the staff member's line manager will work with them to assess and mitigate any potential risk to our students, our staff and our organisational reputation.

Appendix 3: allegations of abuse made against staff

Section 1: allegations that may meet the harm threshold

The PRIDE Academy will always supervise staff and act on any concerns that relate to the safeguarding of children or vulnerable adults.

Allegations or concerns (including low level concerns) about a member of staff, including supply staff and volunteers, must immediately be notified to the Principal and the DSL (or the safeguarding link governor and the OHCAT Safeguarding & Wellbeing team if the concern is about the DSL/Principal) and the same principles of safeguarding applied as detailed elsewhere in this document. It is important to bear in mind that although concern may relate to an individual student, other students may also be at risk.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, trainee teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school.

If there is any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Principal, or a member of the OHCAT Executive Senior Leadership Team (ESLT) where the Principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension

Consideration must be given as to whether it is necessary to remove the subject of the allegations from contact with pupils/students, pending investigations and procedures arising from the allegation. Suspension should not be automatic, but should be considered if: a) there is cause to suspect a pupil/student is at risk of significant harm, b) the allegation warrants investigation by the police, or c) the allegation is so serious that it might be grounds for dismissal.

Any decision to suspend shall be taken only after consultation with the LADO. It will take into account the safety of the pupil/student or pupils/students involved and the impact on any enquiry.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children.

- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work within OHCAT.

If in doubt, the case manager will seek views from the school's HR Business Partner and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Where it has been deemed appropriate to suspend the person, written confirmation will be provided in line with OHCAT's Disciplinary Procedure. The letter should be dispatched within 24 hours, giving the reasons for the suspension. The person should be informed at that point who their named contact is within the organisation and provided with their contact details.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate.

- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care.
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. The subject of the allegations (whether suspended or not) shall be: a) advised to contact her/his trade union or professional association, b) treated fairly and honestly and helped to understand the concerns expressed, processes involved and possible outcomes, c) kept informed of the progress of the case and of the investigation, d) clearly informed of the outcome of any investigation and the implications for disciplinary or related processes and e) provided with appropriate support as appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers, trainee teachers, and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher, trainee teacher, or contracted staff member provided by an agency, the school shares safeguarding responsibilities with the employment agency or business. We will take the actions below in addition to our standard procedures:

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The OHCAT Quality & Safeguarding team will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as supply agencies.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious allegations or reports

If, after appropriate consultation and investigation, an allegation or report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. All such decisions and the reasons for them should be recorded by both the Senior Leadership Team and the LADO. They should agree between them the information that should be put in writing to the individual about whom the allegation was made. Both should then consider the action that should follow in respect of that individual and also the person (or persons) who made the allegation.

Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or malicious will not be referred to in employer references, in line with Keeping Children Safe in Education.

If, following the conclusion of child protection/safeguarding processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses.

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious.
- Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level concern' refers to any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

This does not mean that they are insignificant. All staff should feel able to raise a concern about something they feel is inappropriate or cause for unease, and know that it will be recorded, explored and if necessary followed up with appropriate action.

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

- Being overly friendly with children.
- Having favourites.
- Failing to challenge inappropriate language or behaviour between students (e.g. dismissing the use of sexual slurs as 'just banter').
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating pupils/students.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but may not be in specific circumstances, through to that which is ultimately intended to enable abuse. All staff are encouraged to stay reflective of their own as well as others' behaviour, and to raise any concerns about situations or behaviours that may be or seem inappropriate whether these relate to themselves or others.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what constitutes appropriate behaviour and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empowering staff to share any low-level concerns as per section 7.7 of this policy.
- Empowering staff to self-refer where necessary.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

Responding to low-level concerns

If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

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

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the Staff Code of Conduct. The Principal will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL. If the concern is about the DSL, decisions will be made by the Principal in consultation with

the safeguarding link governor; if it is about the Principal, decisions will be made by the OHCAT Executive Director for Quality & Safeguarding, in consultation with the Chair of Governors and/or Trustees as appropriate.

Appropriate action may include referral to the LADO in order to ascertain whether the harms threshold is met; further training/support for staff; and/or addressing unprofessional behaviour via relevant HR procedures. Where a pattern of concerning or inappropriate behaviour is identified, The PRIDE Academy may implement disciplinary proceedings and/or refer to the LADO where the harms threshold is met.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.
- Retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on part 1 of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's advice for education settings.

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 for prolonged periods and/or on repeat occasions 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 of becoming missing from education. 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

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 (please note that such exchanges are coerced and should not be considered as consensual or freely given), and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

Criminal exploitation of children and vulnerable adults is a geographically widespread form of harm. It can be a one-off occurrence or a series of incidents over time, and can range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group. CCE presents multiple complex safeguarding issues including violence, sexual exploitation, substance misuse and missing persons.

Like other forms of abuse and exploitation, child criminal exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

It is recognised that children and young people with existing vulnerabilities e.g. previous experience of abuse, learning difficulties/disabilities or unstable home life, are targeted for criminal exploitation including by gangs for county lines activity. Those involved in CCE may be exploited by their peers and/or by adults, and it is important to note that children found to be exploiting their peers are also likely to be victims of exploitation themselves and therefore also in need of safeguarding support.

CCE 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. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Travelling alone to places far away from home.
- Misusing drugs and alcohol.

- Suddenly having lots of money, lots of new clothes or new mobile phones
- Found to be carrying or selling drugs.
- Carrying weapons or know people that have access to weapons.
- Going missing from school or home for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.
- Receiving many more calls or texts than usual.
- In a relationship with or hanging out with older/controlling people.
- Unexplained injuries.
- Becoming very reserved or seeming like they have something to hide.
- Fearfulness.
- Self-harming.

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

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 (please note that such exchanges are coerced and should not be considered as consensual or freely given) 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 can range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised as such by adults and professionals, and may be criminalised for actions they take while under coercion.

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. Most sexual abuse is committed by individuals known to the victim.

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. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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.

Child-on-child abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can take place face-to-face, online, and can occur simultaneously between the two.

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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 (this is 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).
- Physical assault and harm, or the threat of harm with a weapon.
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI.
- Upskirting, which is a criminal offence, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or if a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and/or trauma and will offer them appropriate support.

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 including physical, sexual, emotional abuse, and stalking) 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.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

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.

The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

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 7.3 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/student 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 parents/carers 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 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

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

The DSL will:

- Speak to the pupil/student 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 fmu@fco.gov.uk
- Refer the pupil/student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- **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 will 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 are aware that children and young people with SEND may be more vulnerable to radicalisation into extremism or supporting terrorism. To that end, we are committed to safeguarding pupils/students from radicalism and extremism. Safeguards in place include:

- All governors, teachers, teaching assistants and non-teaching staff have an understanding of what radicalisation is, how it happens and why we need to be vigilant in school or college; how to identify any possible concerns e.g. changes in pupils'/students' behaviour which could indicate a need for help or protection; and how to report any concerns to the DSL so that further safeguarding action (including a Prevent referral) can be taken if necessary.
- All governors, teachers, teaching assistants and non-teaching staff receive regular training and updates on the Prevent duty and Channel process.

- All governors, teachers, teaching assistants and non-teaching staff understand this policy and will follow the procedure when issues arise.
- All pupils/students, parents/carers and families know that the school and OHCAT have policies in place to keep pupils/students safe from harm and that these policies, procedures and systems are regularly reviewed to ensure they are appropriate and effective.
- Our curriculum actively promotes the understanding of British values including democracy and the rule of law, as well as supporting our pupils/students to develop good self-esteem and positive relationships with peers and other members of their communities.
- Visiting speakers are vetted beforehand to ensure that they are not affiliated with any extremist views or organisations and are supervised throughout the duration of their visit, to ensure that they do not promote or espouse extremist views while speaking to students or staff.

We will ensure that suitable internet filtering is in place and equip our pupils/students 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'/students' behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a pupil/student 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 social media
- 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/student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including the Anti-Radicalisation Policy, the Online Safety Policy and the Visiting Speaker Policy.

Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB 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).

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

When considering whether behaviour is harmful, take into account the ages and stages of development of the children. Sexual behaviour can be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not). Keep in mind that it is possible for a younger child to abuse an older child, particularly where they have power over them, such as where the older child has disabilities or is small in stature.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. Additionally, children and young people displaying harmful sexual behaviour have often experienced their own abuse and trauma, and it is imperative that they are offered appropriate support.

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.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours.
- 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.
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse.

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault.
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying).
- Criminal exploitation.

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:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school.
- Having been involved in offending, such as theft or robbery.
- Being male.
- Having experienced child maltreatment.
- Having used drugs or alcohol in early adolescence.
- Having previously been a victim or previously perpetrated violence.

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil/student being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action.
- Put in place a safety and support plan for the pupil (depending on the risk).
- Where relevant, consider action to de-escalate peer conflict.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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 must sign in at reception and wear a visitor's badge. Once signed in, visitors are provided with key safeguarding and health and safety information.

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 show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

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.

All visitors must sign out upon leaving.

Missing pupils/students and non-collection of children

Please refer to the Missing Child Policy for details of our non-collection procedure.