



## Safeguarding and Child Protection Policy

<b>Responsible Board/Committee</b>	Academy Trust Foundation Trust
<b>Policy Type</b>	Hybrid Policy
<b>Policy Owner</b>	Foundation Leader in Education – Safeguarding and Well-being
<b>Statutory</b>	Yes
<b>Publish Online</b>	Yes
<b>Last Review Date</b>	July 2025
<b>Review Cycle</b>	Annual  This policy will not expire but will be reviewed as per its designated cycle. This policy remains effective whilst the review is taking place and will only become non-applicable once the updated version has been approved.
<b>Next Review Date</b>	July 2026
<b>Version</b>	7

<b>School</b>	King Edward VI King's Norton School for Boys
<b>School Policy Owner</b>	T Boyce
<b>SGB Approval Date</b>	September 2025

The purpose of this policy is to set out a framework outlining the King Edward VI Foundation and Academy Trust's approach to safeguarding and child protection.

The King Edward VI Foundation (the 'Foundation Charity') (registration no. 529051) charity comprises two Independent Schools and the Foundation Office. The King Edward VI Academy Trust Birmingham (the 'Academy Trust') registration no.10654935) incorporates the Academies. The Foundation Charity and the Academy Trust are collectively known as the 'Foundation'.

King Edward VI King's Norton School for Boys, is a non-selective Academy Trust school our demographic is:

	Our Setting	National Avg.
Number on roll	822	N/A
Pupil Premium (PP) %	32.36%	27.1%
Students with Special Educational Need (SEN) %	24.69%	19.6%
English as an Additional Language (EAL)	10.58%	21.3%
Percentage of students from ethnic minority backgrounds	35%	37%

Our student population live in the follow Income Deprivation Affecting Children Index (IDACI) deciles, IDACI is a measure of the percentage of children aged 0–15 who live in families with low incomes:

#### **IDACI Decile Percentage of Students (Academic Year 2025 – 26)**

IDACI Decile	Percentage of Students
10 - 10% least deprived	0.11%
9	6.70%
8	11.02%
7	11.59%
6	7.16%
5	11.59%
4	2.61%
3	12.73%
2	14.55%
1 - 10% most deprived	21.93%

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# 1 Purpose: our strong safeguarding culture

## 1.1 Why it is important

Safeguarding is everyone's responsibility, and it is the duty of our school to safeguard and promote the welfare of children. 'Children' includes everyone under the age of 18. This is our core safeguarding principle.

In adhering to this principle, we focus on providing a safe and welcoming environment for all our children, regardless of age, ability, culture, race, language, religion, gender identity, or sexual identity. All our children have equal rights to support and protection.

One of the cornerstones of our safeguarding culture is this policy, along with the procedures it contains. This policy applies to all staff, volunteers, and governors, all of whom are trained on its contents and their safeguarding duties. It also extends to any establishment that our school commissions to deliver education to our pupils on our behalf, including alternative provision settings. Our School Governing Body (SGB) will ensure that any commissioned agency reflects the values, philosophy, and standards of our school and that their provision meets the needs of individual pupils. We will also seek assurances that any agency or provider has the appropriate safeguarding provisions in place and consult with the school where appropriate, with the school maintaining overall responsibility for the safeguarding of the pupil. This is reflected in our Hiring and Lettings Policy.

We update this policy at least annually to reflect changes in law, guidance, and best practices. It should be read alongside our other safeguarding policies.

## 1.2 What it means for our pupils

We work with our local safeguarding partners to promote the welfare of children and to protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans that provide additional support to the child. It also includes contributing to broader, multi-agency strategic discussions about safeguarding children.

All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any pupils or staff involved in child protection or safeguarding issues will receive appropriate support.

Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful, and safe behaviour among pupils, and we set a good example by conducting ourselves in an appropriate manner.

Identifying safeguarding and child protection concerns often begins with recognising changes in pupils' attendance and/or behaviour and knowing that these changes may be signs of abuse, neglect, or exploitation. Challenging behaviour may also be an indicator of abuse.

All of our staff will reassure children that their concerns and disclosures will be taken seriously, and that they will be supported and kept safe.

## **2 Roles and responsibilities**

### **2.1 In our school, the following people will take the lead in these areas:**

- Our Designated Safeguarding Lead (DSL) is: T Boyce
- Our Deputy Designated Safeguarding Leads (DDSL) are: S McIntosh, R Hanson, G Rehman.
- Our Designated Teacher for Looked After Children is: J Butcher, D Clayton, T Boyce, S McIntosh, R Hanson
- Our Data Protection Officer is: GDPR Sentry Limited, Unit 434 Birch Park, Thorp Arch Estate, Weatherby, West Yorkshire, LS23 7FG, info@gdprsentry.com
- Our Data Protection Lead is: D Clayton / A Griffiths
- Our Equality, Diversity and Inclusion Lead is: M Cameron
- Our Senior Mental Health Lead is: T Boyce
- Our Single Point of Contact for Prevent is: S McIntosh
- Our Operation Encompass Key Adult is: T Boyce
- Our Special Educational Needs and Disabilities Coordinator (SENDCO) is: H Dowen
- Our Lead First Aider is: J Forth
- Our Health and Safety Representative is: A Griffiths
- Our Safeguarding Link Governor is: S Bartlett

### **2.2 The designated safeguarding lead (DSL):**

The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety) in the school. The DSL duties include:

- Ensuring that child protection policies are known, understood, and applied correctly by staff.
- Working with the Foundation Safeguarding Lead to ensure that the Trust's child protection policies are reviewed annually and that the procedures are reviewed regularly.
- Acting as a source of support, advice, and expertise for all staff on child protection and safeguarding matters.

- Liaising with the Headteacher regarding ongoing enquiries under Section 47 of the Children Act 1989 and police investigations, and being aware of the requirement for children to have an appropriate adult in relevant circumstances.
- Acting as a point of contact with the three safeguarding partners.
- Making and managing referrals to children's social care, the police, or other agencies.
- Keeping detailed, accurate, secure written records of concerns, discussions, and decisions made, including the rationale for those decisions (including where referrals were or were not made).
- Taking part in strategy discussions and inter-agency meetings.
- Liaising with the 'case manager' and the designated officer(s) at the local authority if allegations are made against staff.
- Making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements.
- Transferring the child protection file to a child's new school.
- Adhering to the [Foundation Safeguarding Critical Incident Response, Reporting and Recovery Guidance](#).

#### **2.3 The deputy designated safeguarding lead(s):**

Our deputy DSL(s) is/are trained to the same level as the DSL and support(s) the DSL with safeguarding matters on a day-to-day basis. The ultimate lead responsibility for child protection remains with the DSL.

#### **2.4 The School Governing Body:**

The Governing Body is the accountable body and must ensure that they comply with their duties under legislation and attend appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge, testing, and assure them that the safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole-school approach to safeguarding.

The Governing Body should be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and its local multi-agency safeguarding arrangements.

In the context of safeguarding, the Governing Body should carefully consider how they are supporting their pupils regarding protected characteristics, including disability, sex, sexual orientation, gender reassignment, and race.

All governors must have read Part 1 and Part 2 of Keeping Children Safe in Education and confirm that they have understood their roles and responsibilities, including their role in the management of safeguarding, with the Clerk.

Governors should understand the local criteria for action and the local protocol for assessment, and ensure that these are reflected in school policies and procedures. The Governing Body should also be prepared to supply information as requested by the three safeguarding partners.

## 2.5 **The safeguarding Governor/Trustee**

The role of the safeguarding Governor/Trustee is to provide support and challenge to the DSL and the leadership of the school on how they manage safeguarding, so that the safety and well-being of the children can continuously improve. The role includes:

- Understanding the requirements of the Governance Handbook and Keeping Children Safe in Education 2025.
- Supporting and challenging the DSL on the standards of safeguarding at the school/trust.
- Confirming that consistent and compliant safeguarding practice takes place across the school/trust.
- Reporting to the board of trustees about the standard of safeguarding in the school.

The DSL and the safeguarding Governor/Trustee meet regularly to discuss safeguarding issues and agree on steps to continually improve safeguarding practices in the school.

## 3 **Procedures**

### 3.1 **Children who may be particularly vulnerable**

Some children are at greater risk of abuse, neglect, and exploitation. This increased risk can be attributed to various factors, including social exclusion, isolation, discrimination, and prejudice. To ensure that all our pupils receive equal protection, we give special consideration to children who:

- Are vulnerable because of their race, ethnicity, religion, special educational needs, disability, gender identity, or sexuality.
- Are vulnerable to being bullied or engaging in bullying.
- Are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism.
- Live in chaotic or unsupportive home situations.

- Live transient lifestyles, or live away from home, or in temporary accommodation.
- Are affected by parental substance abuse, domestic abuse, or parental mental health needs.
- Do not have English as a first language.
- Experience or have experienced bereavement or mental health difficulties.
- Are in care, privately fostered, or have returned home to their family from care.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded.

### 3.2 Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect, and exploitation in this group of children, which can include:

- Assumptions that indicators of possible abuse, such as behaviour, mood, and injury, relate to the child's disability without further exploration.
- Being more prone to peer group isolation than other children.
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Our staff are trained to be aware of and identify these additional barriers to ensure this group of children is appropriately safeguarded.

### 3.3 Children who are absent from education

Children being absent from education for prolonged periods, on an increasing basis and/or on repeat occasions, and children with unexplainable and/or persistent absences from education, can be an indicator of abuse, neglect, and exploitation, including sexual abuse or exploitation, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation, or risk of forced marriage. Our staff are alert to these risks.

We closely monitor attendance, absence, and exclusions, and our DSL will take appropriate and proactive action, including notifying the local authority, particularly where children go missing on repeated occasions, on an increasing basis, and/or are missing for periods during the school day.

### 3.4 Alternative provision

Where a pupil is placed with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and will ensure we are satisfied that the placement meets the pupil's needs.

### 3.5 **Mental health**

Schools have an important role to play in supporting the mental health and well-being of their pupils.

All staff are aware that mental health problems can be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, or exploitation. Staff are also aware that where children have suffered adverse childhood experiences, those experiences can impact their mental health, behaviour, and education.

Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a deputy, who will alert other relevant agencies as necessary.

### 3.6 **Children who are lesbian, gay, bi, or trans (LGBT)**

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. Unfortunately, children who are LGBT or are simply perceived to be LGBT can be targeted by other children. The risk to these children can be compounded where children who are LGBT lack a trusted adult with whom they can be open.

Our staff endeavour to reduce the barriers and provide a safe space for those children to speak out or share their concerns with them.

The 2024 Cass review of gender identity services for children and young people identified that caution is necessary for children questioning their gender, as there remain many unknowns about the impact of social transition, and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs.

When supporting a gender questioning child, as recommended by statutory guidance, we take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

### 3.7 **Child-on-child abuse**

Child-on-child abuse – children harming other children – is unacceptable and will be taken seriously; it will not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. It is more likely that boys will be perpetrators of child-on-child abuse and girls victims, but allegations will be dealt with in the same manner, regardless of whether boys or girls make them.

All staff should be clear about the school's policies and procedures for addressing child-on-child abuse and maintain an attitude of 'it could happen here'.

Child-on-child abuse can take many forms, including:

- **Physical abuse** such as shaking, hitting, biting, kicking, or hair pulling.
- **Bullying**, including cyberbullying, prejudice-based and discriminatory bullying.
- **Sexual violence and harassment**, such as rape and sexual assault or sexual comments and inappropriate sexual language, remarks, or jokes. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable.
- **Causing someone to engage in sexual activity without consent**, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party.
- **Upskirting** involves taking a picture under a person's clothing without their knowledge for the purposes of sexual gratification or to cause humiliation, distress, or alarm.
- **Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)**, including pressuring others to share sexual content.
- **Abuse in intimate personal relationships between peers (also known as teenage relationship abuse)**, such as a pattern of actual or threatened acts of physical, sexual, or emotional abuse.
- **Initiation/hazing** is used to induct newcomers into a sports team or school groups by subjecting them to potentially humiliating or abusive trials with the aim of creating a bond.

Different gender issues can be prevalent when dealing with child-on-child abuse, for example, girls being sexually touched/assaulted or boys being subject to initiation/hazing-type violence.

All staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but is not being reported.

### 3.8 **Minimising risk**

We take the following steps to minimise or prevent the risk of child-on-child abuse:

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries.
- Using assemblies to outline acceptable and unacceptable behaviour.
- Using RSE and PSHE to educate and reinforce our messages through stories, role play, current affairs, and other suitable activities.
- Ensuring that the school is well-supervised, especially in areas where children may be vulnerable.

### 3.9 Investigating allegations

All allegations of child-on-child abuse should be passed to the DSL immediately, who will investigate and manage the allegation as follows:

- **Gather information** - children and staff will be spoken with immediately to gather relevant information.
- **Decide on action** - if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this Child Protection and Safeguarding Policy.
- **Inform parents** - we will usually discuss concerns with the parents. However, our focus is the safety and wellbeing of the pupil and so if the school believes that notifying parents could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.
- **Record** – all concerns, discussions, and decisions made, and the reasons for those decisions will be recorded in writing, kept confidential, and stored securely on the school's child protection and safeguarding systems, and/or in the child's separate child protection file. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached, and the outcome. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

Where allegations of a sexual nature are made, the school will follow the statutory guidance set out in Part 5 of Keeping Children Safe in Education 2025.

Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this policy. To ensure children can report their concerns easily, the school has the following system in place for children to confidently report abuse: Tell Someone – Students can access the Tell

Someone system confidentially from any computer through the link on the school website [<https://forms.office.com/r/PbanFVjTJv>]

Supporting those involved, our staff reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

The support required for the pupil who has been harmed will depend on their particular circumstances and the nature of the abuse. The support we provide could include counselling and mentoring or some restorative justice work.

Support may also be required for the pupil that caused harm. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. The consequences for the harm caused or intended will be addressed.

Any reports of abuse involving children with SEND will involve close liaison with the Designated Safeguarding Lead (DSL) (or deputy) and the Special Education Needs and Disabilities Coordinator (SENDCo).

If a report is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead (DSL) or deputies will consider whether the child and/or the person who has made the allegation needs help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the Headteacher will consider whether any disciplinary action is appropriate against the individual who made it.

### **3.10 Serious violence**

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of mental health difficulties, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

All staff are made aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or

permanently excluded from school, having experienced maltreatment, and having been involved in offending, such as theft or robbery.

### **3.11 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)**

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

- Age
- Gender
- Sexual identity
- Cognitive ability
- Physical strength
- Status
- Access to economic or other resources

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. They can be one-off occurrences or a series of incidents over time, and may or may not involve force or violence. Exploitation can be physical and take place online.

### **3.12 Child Criminal Exploitation (CCE)**

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

Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed to or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different from that of boys, and both boys and girls who are criminally exploited may be at higher risk of sexual exploitation.

### **3.13 CCE indicators**

- **CCE** indicators can include children who:
  - (a) Appear with unexplained gifts or new possessions.
  - (b) Associate with other young people involved in exploitation.
  - (c) Suffer from changes in emotional well-being.
  - (d) Misuse drugs or alcohol.
  - (e) Go missing for periods or regularly return home late.
  - (f) Regularly or increasingly miss school or education or do not partake in education.

### 3.14 Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse, which may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

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

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

### 3.15 CSE indicators

- The above indicators can also be indicators of **CSE**, as can children who:
  - (a) Have older boyfriends/girlfriends.
  - (b) Suffer from sexually transmitted infections or become pregnant.

We include the risks of criminal and sexual exploitation in our RSE and health education curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim.

Victims of criminal and sexual exploitation can be boys or girls, and it can have an adverse impact on a child's physical and emotional health.

All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns are reported immediately to the DSL. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

### **3.16 County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store, and sell drugs and money, with offenders often using coercion, intimidation, violence, and weapons to ensure the compliance of victims.

County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child. This power imbalance can be attributed to the same range of factors outlined in paragraph 10.1 of this policy.

Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those outlined at 10.3 of this policy, with the primary indicator being the occurrence of missing episodes from home and/or school.

Additional specific indicators that may be present where a child is criminally exploited include children who:

- Go missing and are subsequently found in areas away from home.
- Have been the victim or perpetrator of serious violence (e.g. knife crime).
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Are found in accommodation with which they have no connection or in a hotel room where there is drug activity.
- Owe a 'debt bond' to their exploiters.
- Have their bank accounts used to facilitate drug dealing.

All staff are aware of indicators that children are at risk from or are experiencing criminal exploitation. The main indicator is increased absence, during which time the child may have been trafficked for the purpose of transporting drugs or money.

### **3.17 Sharing nudes and semi-nudes**

Sharing photos, videos, and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends, and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or

semi-nude images, videos, or live streams by young people under the age of 18. This could be done via social media, gaming platforms, chat apps, or forums, or carried out offline between devices using services like Apple's AirDrop.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', 'youth-produced sexual imagery' and 'youth-involved sexual imagery'.

The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- Children and young people find nudes and semi-nudes online and share them, claiming to be from a peer.
- Children and young people digitally manipulate an image of a young person into an existing nude image online.
- Images created or shared are used to abuse peers, e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

All incidents involving nude or semi-nude images will be managed as follows:

- The incident will be referred to the DSL immediately, and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.
- At any point in the process, if there is a concern that a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or children's social care.

The UK Council for Internet Safety updated its advice for managing incidents of sharing nudes and semi-nudes in February 2024 - [UKCIS advice 2024](#). The school will consider this advice when managing these issues.

### 3.18 Online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. In addition to educating children about online risks, we have implemented appropriate and effective filtering and monitoring systems to limit the risk of children being exposed to inappropriate content, subjected to harmful online interactions with other users,

and to ensure their own personal online behaviour does not put them at risk. Our school uses Smoothwall to monitor online activity connected to school devices. In our school, when a concern is noted by Smoothwall, the Designated Safeguarding Lead or Deputies are notified immediately, and action is taken. In cases where there is reference to suicide, the school interjects with signposting to support and advice services. Our filtering and monitoring systems also prevent access to harmful and inappropriate content accessed through generative AI tools and products.

These filtering and monitoring systems block harmful and inappropriate content, and we take care to ensure that they do not unreasonably impact on teaching and learning. The systems are reviewed regularly (at least annually) to ensure their effectiveness, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our pupils.

We inform parents and carers about the filtering and monitoring systems we use, so they can understand how we work to keep children safe.

We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online.

Online safety risks can be categorised into four areas of risk:

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

All staff are aware of these risk areas and should report any concerns to the DSL.

Parents/carers can seek further guidance on keeping children safe online from the following organisations and websites:

- What are the issues?: [UK Safer Internet Centre](#)
- Hot topics: [Childnet International](#)
- Parent/carer factsheet: [Childnet International](#)

- Healthy relationships: [Disrespect Nobody](#)
- [Report harmful content](#) - UK Safer Internet Centre - a national reporting centre designed to assist anyone reporting harmful content online.
- [Report a concern to Child Exploitation and Online Protection Safety Centre](#) (CEOP) that a child is being groomed online or sexually exploited: [parent/carer guide to reporting an incident](#).

### 3.19 Domestic Abuse

The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear, or experience the effects of abuse.

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse, between those aged 16 or over who are, or have been, intimate partners, or family members, regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another, or each has or has had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial, and emotional abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality, or background, and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.

Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Where police have been called to a domestic violence incident where children are in the household and have experienced that incident, the police will inform the DSL. This ensures that the school has up-to-date safeguarding information about the child.

All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.

### 3.20 Honour-based abuse

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

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of

this dynamic and additional risk factors, and we take them into consideration when deciding what safeguarding action to take.

If staff are concerned that a child may be at risk of HBA or has suffered from HBA, they should speak to the designated safeguarding lead.

### **3.21 Female genital mutilation**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal and a form of child abuse with long-lasting harmful consequences.

FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday during the summer break. If staff are concerned that a child may be at risk of FGM or has suffered FGM, they should speak to the designated safeguarding lead. Teachers are also under a legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, teachers will personally report the matter to the police and also inform the designated safeguarding lead.

### **3.22 Forced marriage**

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. Coercion may include physical, psychological, financial, sexual, and emotional pressure or abuse.

Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion is not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.

Forced marriage differs from arranged marriage, which is a common practice in many cultures.

If staff are concerned that a child may be at risk of forced marriage, they should speak to the designated safeguarding lead.

### **3.23 Radicalisation and extremism**

Extremism is defined as vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence.

Children are vulnerable to extremist ideology and radicalisation. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions, and beliefs, including the far right and white supremacy.

School plays a crucial role in building resilience to radicalisation and extremism by fostering debate on controversial issues and helping students understand their influence and participation in decision-making.

While we value freedom of speech and expression, this freedom comes with the responsibility to refrain from speech that exploits the vulnerable or incites violence and harm. Free speech is subject to laws and policies on equality, human rights, community safety, and cohesion.

We prohibit the use of our facilities to promote extremist ideological, religious, or political views, or discriminatory views related to protected characteristics under the Equality Act 2010. School also does not allow its facilities to be used by proscribed groups or organisations.

Staff undertake Prevent duty training to identify those at risk of being radicalised or drawn into extremism. If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the designated safeguarding lead.

### **3.24 Staff/pupil relationships**

Staff are aware that inappropriate behaviour towards pupils is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a pupil under the age of 18.

We provide our staff with guidance on their personal online activity, and we have clear rules regarding electronic communications and online interactions with pupils. It is considered a serious disciplinary issue if staff breach these rules.

Our Staff Code of Conduct outlines the expectations for all staff members.

### **3.25 Safeguarding concerns and allegations made about staff, supply staff, contractors, and volunteers**

If a safeguarding concern or allegation is made about a member of staff, supply staff, contractor, or a volunteer, or relates to incidents that occurred when an individual or organisation was using the school premises for the purposes of running activities for children, our established procedures must be followed. Our safeguarding concerns and allegations made about staff, supply staff, contractors, and volunteers' policy and procedure can be accessed here [link], and the full procedure for managing such allegations or concerns is set out in Part Four of Keeping Children Safe in Education 2025.

Safeguarding concerns or allegations made about staff who no longer work at the school will be reported to the police.

Safeguarding concerns or allegations made about staff who no longer work at the school will be reported to the police.

### **3.26 Whistleblowing if you have concerns about a colleague**

It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the Headteacher, unless the complaint is about the Headteacher, in which case the concern should be reported to the Chair of Governors.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

The school's whistleblowing code [<https://kingedwardvifoundation.co.uk/wp-content/uploads/2024/09/ATFDN-Whistleblowing-Policy.pdf>] enables staff to raise concerns or make allegations, allowing for an appropriate investigation to take place.

### **3.27 Staff and Governor/Trustee training**

Our staff receive appropriate safeguarding and child protection training (including online safety and an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring), which is regularly updated. In addition, all staff receive regular updates on safeguarding and child protection to ensure they are up to date and empowered to provide exceptional safeguarding for our pupils.

New staff and volunteers receive a briefing during their induction, which covers this Child Protection and Safeguarding policy, our staff behaviour policy, and how to report and record concerns and information about our DSLs and deputy DSLs.

Our governors/trustees receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring) training at induction, which equips them with the knowledge to provide strategic challenges to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

Our safeguarding Governor/Trustee receives additional training to empower them to support and challenge the DSL and support the delivery of high-quality safeguarding across the Trust.

### **3.28 Safer recruitment**

The governing body and our senior leadership team are responsible for ensuring that we follow recruitment procedures that help deter, reject, or identify individuals who might harm children. When doing so, we check and verify the applicant's identity, qualifications, and work history in accordance with Keeping Children Safe in Education 2025 and the local safeguarding partner arrangements.

All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification.

We ensure that our volunteers are properly checked and supervised when they are in school. We verify the identity of all contractors working on site and request DBS checks where required by the Keeping Children Safe in Education 2025 guidelines. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

When using supply staff, we will obtain written confirmation from supply agencies or third-party organisations that the staff they provide have been appropriately checked and are suitable to work with children. Trainee teachers will be checked by either the school or the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

The Trust maintains a single central record of recruitment checks undertaken in each of our academies. Our recruitment policy and procedures can be accessed here [<http://knsb.kevibham.org/wp-content/uploads/2025/10/ATFDN-Safer-Recruitment-Policy-2025-Updated.pdf>].

### **3.29 Site security**

Visitors are asked to sign in at the school reception and are issued a badge, which confirms they have permission to be on site. If visitors have undergone the necessary checks, they can be granted unescorted access to the school site. Visitors who have not undergone the required checks will be escorted at all times.

### **3.30 Child protection procedures:**

#### **3.31 Recognising abuse**

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education 2025 refers to four categories of abuse. These are outlined in Appendix One, along with indicators of abuse.

#### **3.32 Taking action**

Any child could become a victim of abuse. Key points for staff to remember for taking action are:

- In an emergency, take the necessary action to help the child; if necessary, call 999
- Complete a record of concern form and report your concern to the DSL as soon as possible.
- Share information on a need-to-know basis only, and refrain from discussing the issue with colleagues, friends, or family.

#### **3.33 If you are concerned about a pupil's welfare**

Staff may suspect that a pupil could be at risk. This may be because the pupil's behaviour has changed, their appearance has changed, or physical signs are noticed. In these circumstances, staff will give the pupil the opportunity to talk and ask if they are okay.

If the pupil does reveal that they are being harmed, staff should follow the advice below.

Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or threatened, which could be due to their vulnerability, disability, and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

### **3.34 If a pupil discloses to you**

If a pupil tells a staff member about a risk to their safety or well-being, the staff member will:

- Remain calm and not overreact.
- Allow them to speak freely.
- Not be afraid of silences.
- Not ask investigative questions.
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Not automatically offer physical touch as comfort.
- Let the pupil know that in order to help them, they must pass the information on to the DSL.
- Inform the pupil about what will happen next and provide them with an opportunity to ask questions about the next steps.
- Complete the concern form and pass it to the DSL as soon as possible.
- Report verbally to the DSL even if the child has promised to do it by themselves.
- Let the pupil know when they can expect to be updated or receive more information, emphasising that the pupil can talk to them or the DSL at any time.

### **3.35 Notifying parents**

The school will normally seek to discuss any concerns about a pupil with their parents. If the school believes that notifying parents could increase the risk to the child or exacerbate

the problem, advice will first be sought from children's social care and/or the police before parents are notified.

### **3.36 Referral to children's social care**

The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and their parents will be informed that a referral is being made, unless doing so would increase the risk to the child.

### **3.37 Reporting directly to child protection agencies**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care or the police if they are convinced that a direct report is required or if the DSL, deputies, head teacher, or chair of governors are unavailable and a referral is required immediately.

### **3.38 Confidentiality and sharing information**

Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the DSL, Headteacher, or chair of governors.

### **3.39 Sharing information**

The DSL will normally obtain consent from the pupil and/or parents to share child protection information. Where there is a good reason to do so, the DSL may share information *without* consent and will record the reason for doing so.

Information sharing will occur in a timely and secure manner, only when necessary and proportionate, and only when the information to be shared is relevant, adequate, and accurate.

Information-sharing decisions will be recorded, whether or not the decision is made to share.

The UK GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies when that information may help protect a child. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Data Protection Officer.

### **3.40 Storing information**

Child protection information will be stored separately from the pupil's school file, and the school file will be 'tagged' to indicate that separate information is held. It will be stored and handled in line with our Retention and Destruction Policy.

Our Confidentiality and Information Sharing Policy and our Retention and Destruction Policy are available to parents and pupils upon request.

### **3.41 Special circumstances:**

### **3.42 Looked after children**

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

### **3.43 Children who have a social worker**

Children may require the services of a social worker due to concerns about safeguarding or welfare. Local authorities will share this information with us, and the DSL will hold and use this information to inform decisions about safeguarding and promoting the child's welfare.

### **3.44 Work experience**

The school has detailed procedures in place to safeguard pupils undertaking work experience, including arrangements for checking individuals who provide placements and supervise pupils on work experience, which are in accordance with statutory guidance.

### **3.45 Children staying with host families**

The school may arrange for pupils to stay with host families, for example, during a foreign exchange trip or a sports tour. When we do, we follow the guidance set out in the statutory guidance to ensure hosting arrangements are as safe as possible.

Schools cannot obtain criminal record information from the Disclosure and Barring Service about adults abroad. Where pupils stay with host families abroad, we will agree with the partner schools on a shared understanding of the safeguarding arrangements. Our DSL will ensure the arrangements are sufficient to safeguard our pupils and will include ensuring pupils understand who to contact should an emergency occur or a situation arise that makes them feel uncomfortable. We will also make parents aware of these arrangements.

Some overseas pupils may reside with host families during school terms, and we will work with the local authority to check that such arrangements are safe and suitable.

### **3.46 Private fostering arrangements**

A private fostering arrangement occurs when someone *other than* a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or under 18 if the child is disabled. By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will tell the DSL, and the school will notify the local authority of the circumstances.

## **4. Legislation and guidance**

The following safeguarding legislation and guidance have been considered when drafting this policy:

- Keeping Children Safe in Education (2025)
- Working Together to Safeguard Children (2023)
- What to do if you're worried a child is being abused (2015)
- Prevent duty guidance: Guidance for specified authorities in England and Wales (2023)
- The Teacher Standards 2012
- The Safeguarding Vulnerable Groups Act 2006
- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- The Domestic Abuse Act 2021
- PACE Code C 2019

## **Appendix One - Four categories of abuse**

It is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead. It is the responsibility of staff to report any concerns they may have.

All staff should be aware that abuse, neglect, and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

### **Physical abuse**

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

#### **Indicators of physical abuse**

The following may be indicators of physical abuse:

- Having bruises, bleeding, burns, bites, fractures, or other injuries.
- Showing signs of pain or discomfort.
- Keeping arms and legs covered, even in warm weather.
- Being concerned about changing for PE or swimming.
- An injury that is not consistent with the account given.
- Symptoms of drug or alcohol intoxication or poisoning.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others, including bullying.
- Isolation from peers.

### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capabilities, as well as overprotection and limitations on exploration and learning, or preventing the child from participating in normal social interactions. It may

involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **Indicators of emotional abuse**

The following may be indicators of emotional abuse:

- The child consistently describes him/herself in negative ways.
- Overreaction to mistakes.
- Delayed physical, mental, or emotional development.
- Inappropriate emotional responses or fantasies.
- Self-harm.
- Drug or solvent abuse.
- Running away.
- Appetite disorders – anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

### **Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### **Indicators of sexual abuse**

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour, or age-inappropriate knowledge.
- Aggressive behaviour, including sexual harassment or molestation.
- Reluctance to undress for PE or swimming.
- Anal or vaginal discharge, soreness, or scratching.
- Bruises or scratches in the genital area.

- Reluctance to go home.
- Refusal to communicate.
- Depression or withdrawal.
- Isolation from peer group.
- Eating disorders, for example, anorexia nervosa and bulimia.
- Self-harm.
- Substance abuse.
- Acquiring gifts such as money or a mobile phone from new ‘friends’.

## **Neglect**

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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

## **Indicators of neglect**

The following may be indicators of neglect:

- Constant hunger or stealing, scavenging, and/or hoarding food.
- Frequent tiredness.
- Frequently dirty or unkempt.
- Poor attendance or often late.
- Poor concentration.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones or to develop intellectually or socially.

- Responsibility for activities that are not age-appropriate, such as cooking, ironing, and caring for siblings.
- The child is left at home alone or with inappropriate carers.

## **Appendix Two - Related safeguarding policies**

- Code of conduct.
- Whistleblowing
- Managing allegations and low level concerns
- Safer recruitment
- Grievance procedure
- Disciplinary procedure
- Intimate care
- Complaints
- Behaviour
- Physical intervention and the use of reasonable force.
- Tackling bullying.
- Physical contact.
- Safe working practice.
- SEN.
- Missing children.
- Staff/pupil online communication.
- Handheld devices.
- Confidentiality and information sharing.
- Sexual exploitation.
- FGM.
- Forced marriage.