



Safeguarding & Child Protection Policy

Owner:	CEO
Approved by:	Trust Board
Last review:	September 2024
Approved:	October 2025
Next review due:	July 2026

Contents

1. Key principles	4
2. The Definition of Safeguarding	4
3. Roles and responsibilities	5
3.1. The safeguarding responsibilities of the Principal	5
3.2. The safeguarding responsibilities of the Designated Safeguarding Lead	6
3.3. The role of the School Development Board in Safeguarding	7
3.4. The role of the designated teacher	8
4. The safeguarding responsibilities of all staff	8
5. Critical incident reporting: this must be completed by the Principal or DSL	10
5.1. Procedures in the case of a critical safeguarding incident.	10
5.2. Procedures in the case of a compulsory lockdown:	11
6. Recognising abuse and taking action	11
7. Specific safeguarding concerns	12
7.1. Radicalisation and extremism	12
7.2. So called 'Honour based abuse' including Female Genital Mutilation (FGM), Breast Ironing, Forced Marriage and violence against women and girls.	12
7.3. Child on child abuse including sexual harrassment and sexual violence	13
7.4. Child Criminal Exploitation (CCE)	14
7.5. Child Sexual Exploitation (CSE) - a form of child sexual abuse	14
7.6. Serious Violence	15
7.7. Child Abduction and Community Safety Incidents	15
7.8. Modern Slavery and the National Referral Mechanism	15
7.9. Cybercrime	15
7.10. Homelessness	16
7.11. Domestic Abuse	16
8. Our approach to teaching pupils about staying safe	17
8.1. Safeguarding risks	17
8.2. Mental health and wellbeing	17
9. Allegations against staff and low level concerns	17
9.1. Allegations /concerns about a staff member, supply staff or volunteer	17
9.2. Record keeping	18
9.3. Confidentiality and information sharing	18
9.4. Evaluating the effectiveness of safeguarding systems and procedures	19
10. Alternative Provision	19
10.4. Use of school or premises for non-school activities	20
11. Children who are absent from education	20
12. Safer recruitment	21
13. Complaints about safeguarding provision	21
Appendix 1 - Harmful Sexual Behaviour Policy	22

1. Our commitment	22
2. Policy statement	22
3. Definition of sexual abuse	23
4. Harmful Sexual Behaviour (HSB)	23
5. Minimising the risk of harmful sexual harmful sexual behaviour: Pupils	26
6. Minimising the risk of harmful sexual behaviour: School staff	27
7. Minimising the risk of harmful sexual behaviour: Parents	28
8. Responding to an incident / allegation	29
8.1. Initial actions	29
8.2. Recording an incident / allegation	29
8.3. Risk Assessment	30
8.4. Considerations	30
9. Supporting the pupil who has allegedly experienced harmful sexual behaviour	31
10. Supporting the pupil who has allegedly displayed harmful sexual behaviour	31
11. Investigating the incident	32
12. Investigation outcomes	32
13. Monitoring arrangements	33
14. Harmful Sexual Behaviour Flowchart	34
15. Risk assessment	37
16. Action following a report of sexual violence and/or sexual harassment.	37
17. Children sharing a classroom	38
18. Options to manage the report.	39
19. Ongoing response: Safeguarding and supporting the victim	42
20. Ongoing Considerations: Victim	44
21. Maintaining close liaison with the police is essential.	44
22. Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour.	44
23. Toolkits	45
24. Opportunities to teach online safety to pupils	46
25. Advice for Proprietors and senior leaders	46
26. Remote education, virtual lessons and live streaming	46
27. Support for children	47
28. Parental support	47
29. Appendix 2 - Online and Digital Safety	48

Glossary of Terms

Principal	The Principal is the job title for the Leader within an academy school
School Development Board (SDB)	Each trust school has a local governing body to offer support and challenge to senior leaders in the school whilst reviewing and monitoring areas for which it has delegated responsibility from the Trust Board
Governors	Each School Development Board (SDB) consists of representatives from staff, parent /carers and the wider community
Trustees	The Trust Board is accountable for the work of the SDBs. Trustees are accountable for all the decisions made for all schools within the Trust. They delegate some responsibilities to the School Development Boards.
CEO	The Chief Executive Officer is responsible for the academies, staff and pupils within the Cotswold Beacon Academy Trust. The CEO acts as the Accounting Officer and is personally responsible to Parliament for Trust schools funding.

1. Key principles

- 1.1. Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers, Members, Trustees, local Governors and external parties within the school and details our whole school approach to safeguarding.
- 1.2. Our policy and procedures also apply to any on-site extra-curricular activities and off- site activities provided by the academy schools.
- 1.3. Where extra-curricular activity or services are provided by another body, school leaders must ensure that this body has the appropriate safeguarding and child protection policies and procedures in place. This should be part of the lease/hire agreement and if not satisfied, can lead to termination of the agreement. This also includes external bodies providing holiday/summer school activities.

2. The Definition of Safeguarding

- 2.1. Safeguarding and promoting the welfare of children means:
 - 2.1.1. Providing help and support to meet the needs of children as soon as problems emerge;
 - 2.1.2. Protecting children from maltreatment, whether that is within or outside the home, including online;
 - 2.1.3. Preventing impairment of children's mental or physical health or development;
 - 2.1.4. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
 - 2.1.5. Taking action to enable all children to have the best outcomes.
- 2.2. **Child protection** is an aspect of safeguarding but is focused on how we respond to prevent children suffering, or being likely to suffer, significant harm.

- 2.3. **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. See Keeping Safe in Education (KCSIE) for the different types of abuse.
- 2.4. **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. This also includes ill treatment that is not physical as well as the impact of witnessing ill treatment of others for example with regards to witnessing domestic abuse. KCSIE defines neglect in more detail.
- 2.5. **Children** include everyone under the age of 18.
- 2.6. **Children in need:** A child in need is defined under the Children Act 1989 and 2004 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local safeguarding partners (including Integrated Care Boards, Police and social care) are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

3. Roles and responsibilities

3.1. The safeguarding responsibilities of the Principal

It is the responsibility of the Principal to ensure the effective implementation of this policy and for developing the robust and positive culture of safeguarding within the school. This includes:

- 3.1.1. Ensuring that staff (including temporary staff) and volunteers read and understand this policy as part of their induction.
- 3.1.2. Ensuring that all staff complete the mandatory safeguarding compliance annual training.
- 3.1.3. Ensuring that all staff complete their Code of Conduct affirmation within the first two weeks of the autumn term, or the term in which they join the school.
- 3.1.4. Completing the Safeguarding Self Audit Tool within GCC guidelines and completing the subsequent action plan for quality assurance by CBAT's CEO and by the assigned partnership Regional Education Director.
- 3.1.5. Communicating this policy to parents when their child joins the school and via the school website.
- 3.1.6. Ensuring that the DSL has the appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- 3.1.7. Ensuring that the safeguarding local arrangements are updated and available on the school's website.
- 3.1.8. Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- 3.1.9. Ensuring that regular checks are carried out on the Single Central Record (SCR) by CBAT's CEO and by the partnership trust's Regional Education Director at least once per half term and that

the HR Hub are advised of all updates needed to the SCR. Internal cross checks will be made on all SCRs by the HR Hub teams once per term.

- 3.1.10. Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- 3.1.11. Monitoring and acting upon notifications from Senso or delegating this responsibility to the DSL.
- 3.1.12. Ensuring that all of the appropriate checks and records are kept with regards to pupils attending alternative provision.
- 3.1.13. Ensuring that all staff are aware of the DfE guidance in relation to sexual violence and sexual harassment within KCSIE, Part 5, [KCSIE](#). This guidance should be used as a point of reference.
- 3.1.14. Carefully considering how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

3.2. The safeguarding responsibilities of the Designated Safeguarding Lead

- 3.2.1. Take lead responsibility for safeguarding and child protection including online safety. See [KCSIE](#);
- 3.2.2. Act as a source of support, advice and expertise for all staff;
- 3.2.3. Act as a point of contact with the local safeguarding partners;
- 3.2.4. Liaise with the principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- 3.2.5. Report any allegations against staff, volunteers, or contractors to the CBAT CEO. As required, liaise with the "case manager" (Principal) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member see CBAT policy for managing allegations of abuse against teaching staff (including support staff);
- 3.2.6. Inform the Principal of any low level concerns (see [KCSIE](#)) brought to their attention or allegations made against other staff of which they become aware.
- 3.2.7. Inform the Trust DSL (currently the CEO) when reporting serious safeguarding issues such as a critical incident.
- 3.2.8. Liaise with staff on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- 3.2.9. Liaise closely with the SENDCO to ensure that pupils with SEND needs are appropriately safeguarded.
- 3.2.10. Understand the clear expectations about child-on-child abuse (including sexual violence and sexual harassment) in the day-to-day work of the school and communicate these expectations to staff in all roles.

- 3.2.11. Ensure that the systems for pupils to report any concerns are robust and understood by all staff.
- 3.2.12. Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- 3.2.13. Ensure that child protection files are kept up to date and historic files are stored securely and confidentially.
- 3.2.14. Refer suspected cases, as appropriate to the relevant agency (within the local safeguarding partnership, Channel programme, Disclosure and Disbarring Service), and support staff who make such referrals directly.
- 3.2.15. Liaise with the senior mental health lead where safeguarding concerns are linked to mental health to establish appropriate support.
- 3.2.16. Work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the school.
- 3.2.17. Ensure that the staff are aware of the cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort;
- 3.2.18. Support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- 3.2.19. Ensure that children are taught about safeguarding including online safety, as part of providing a broad and balanced curriculum.
- 3.2.20. Ensure that effective monitoring systems (SENSO) are in place and filtering and monitoring technology is on school devices and school networks, to include review of Artificial Intelligence (AI) and that this is managed and implemented.

3.3. The role of the School Development Board in Safeguarding

Individual schools will have a named SDB member who will be a 'Safeguarding Champion'. If this governor does not already hold a current DBS check, they will require one to be conducted. This must be a different person from the DSL. The safeguarding champion will maintain an awareness of the school's policy and procedures in relation to safeguarding.

The Safeguarding Champion will:

- 3.3.1. Be familiar with the school's policy and procedures in relation to safeguarding and wellbeing including the Child Protection and Safeguarding policy.
- 3.3.2. Meet with the Designated Safeguarding Lead (DSL) once a term to check in on the children's lived safeguarding experience at the school.
- 3.3.3. Act as a link between the DSL and the School Development Board.

- 3.3.4. Keep a focus on safeguarding at SDB meetings and remind others of how those matters might impact the safety and wellbeing of pupils.
- 3.3.5. Encourage colleagues to recognise and be aware of safeguarding issues at all times.
- 3.3.6. Complete relevant safeguarding training identified by the Trust and ensure that this training is updated, at least annually.
- 3.3.7. Carefully consider how school leaders are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.
- 3.3.8. Ensure effective safeguarding procedures are in place, including monitoring and keeping up to date.

3.4. The role of the designated teacher

- 3.4.1. Under sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher must have appropriate training and the relevant qualifications and experience: Designated teacher for looked-after and previously looked- after children
- 3.4.2. The designated teacher should also work with the virtual school head to promote the educational achievement of previously looked after children. In other schools, an appropriately trained teacher should take the lead. See also: [Promoting the education of looked after and previously looked after children](#) (statutory guidance) and [Promoting the education of children with a social worker](#) (non-statutory guidance).

4. The safeguarding responsibilities of all staff

- 4.1. Safeguarding is everyone's responsibility.
- 4.2. All staff have a responsibility to exercise vigilance and to be proactive, in recognising and acting upon signs that suggest a child may be in need of help as well as the signs of abuse, neglect, the signs related to child on child sexual abuse and declining mental health.
- 4.3. **All staff** will read and sign to indicate their understanding of Part 1 (Annex A and Annex B) of [KCSIE](#), and review this guidance at least annually.
- 4.4. **All staff** should be aware of the process for making referrals to children's social care and for statutory assessments under the Children's Act 1989, especially section 17 (children in need) and section 47 (a child suffering or likely to suffer, significant harm) that may follow a referral, along with a role they might be expected to play in such assessments.
- 4.5. **All CBAT account holders** will be provided with a copy of the ICT Acceptable Use Policy via iAM Compliant, and asked to confirm that they have read, understood and accepted the terms of this Policy.
- 4.6. **All staff** must complete annual mandatory safeguarding compliance training and other mandatory compliance safeguarding training as directed by CBAT as a minimum requirement.

- 4.7. **All staff** will be made aware of our systems which support safeguarding within the school which are implemented and monitored by the DSL. This includes:
- 4.7.1. That abuse, neglect and safeguarding issues are rarely stand alone events that can be covered by one definition or label. Multiple issues are likely to overlap with one another.
 - 4.7.2. That mental health problems can in some cases be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
 - 4.7.3. That child-on-child sexual harassment is never to be treated as ‘banter’ or ‘part of growing up’ but that any reported cases will be dealt with seriously, with appropriate sanctions and support provided in line with our behaviour policy.
 - 4.7.4. The process by which a concern about a pupil should be raised. See the diagram in part 1 (Actions Where There Are Concerns About a Child) of [KCSIE](#).
 - 4.7.5. The appropriate safeguarding response to pupils who are missing from education.
 - 4.7.6. 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. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
 - 4.7.7. The early help assessment process and their role within it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals and relevant agencies to support early identification and assessment.
 - 4.7.8. That some pupils may be more vulnerable to safeguarding risks, see [KCSIE](#).
 - 4.7.9. This can also include LGBT children who can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.
 - 4.7.10. That pupils with SEND or certain medical or physical conditions may be more vulnerable and less likely or able to report concerns. Staff must be aware of not making assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s condition without further exploration; that these children may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; that they may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; communication barriers and difficulties in managing or reporting these challenges; and that cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so. It is important that any pupils with SEND needs have a trusted adult with whom they can be open.
 - 4.7.11. All staff must know the procedure and who at the School or Trust to report a concern regarding an employee, contractor, or volunteer.

5. Critical incident reporting: this must be completed by the Principal or DSL

5.1. Procedures in the case of a critical safeguarding incident.

5.1.1. Our definition of critical incidents incorporates cases where there is the potential for a Serious Case Review to be conducted following the incident and/ or could attract media attention. Therefore, through the Trust's Partnership Agreement require, Principals and DSLs to define an incident as critical in the following circumstances:

- 5.1.1.1. A child has died unexpectedly;
- 5.1.1.2. A child sustains a potentially life-threatening injury or serious and permanent impairment of health (physical and /or mental) or development (through an accident, assault, abuse or neglect to include honour based abuse);
- 5.1.1.3. A child is taken seriously ill with a life limiting medical condition, or is seriously ill and requires immediate hospital treatment or referral;
- 5.1.1.4. A child has made a suicide attempt or has given what is perceived to be a realistic intention to make a suicide attempt;
- 5.1.1.5. A child is believed to have been subjected to serious sexual abuse, e.g. organised, complex abuse, grooming, trafficking, slavery;
- 5.1.1.6. A child is suspected to have undergone or suspected to be at significant risk of FGM (Female Genital Mutilation), forced marriage, or honour based violence;
- 5.1.1.7. A child has been arrested on suspicion of perpetrating a particularly serious offence, either against another child or adult or property (to include serious sexual abuse such as rape);
- 5.1.1.8. A child has been arrested on suspicion of county lines criminal activity or being engaged in extremist activities;
- 5.1.1.9. A staff member has brought unwanted media attention to the school, e.g. is reported to have been arrested on suspicion of criminal activity;
- 5.1.1.10. An incident in the community causes the school to implement an emergency lockdown or to immediately evacuate or close the school;
- 5.1.1.11. Any incident in the community that has the potential to cause threat to life, impair the mental health and wellbeing of staff or pupils (i.e. witness an incident that causes trauma) or to bring a media focus to the school;
- 5.1.1.12. A child is missing/absent;
- 5.1.1.13. Serious assault/fight pupil (for example a pupil is assaulted by another pupil and sustains an injury where they need medical attention or hospital treatment);
- 5.1.1.14. Serious assault/fight employee (for example an employee is assaulted by a pupil and sustains an injury where they need medical attention or hospital treatment);
- 5.1.1.15. Possession of or threat with weapon;

5.1.2. Where a critical incident has occurred the response within a Critical Safeguarding Incident Response document must be followed as part of our Safeguarding Assurance Framework.

5.2. Procedures in the case of a compulsory lockdown:

- 5.2.1. In the extreme event of the school being closed due to a compulsory full or partial closure, the school's lockdown policy should come into operation in addition to the processes outlined in this policy to ensure that our high level of vigilance continues to safeguard our pupils.

6. **Recognising abuse and taking action**

- 6.1. All staff, contractors and volunteers, and School Development Board members must follow the procedures set out below in the event of a safeguarding issue. Always speak to the DSL or Principal.
- 6.2. If a child makes a disclosure to you, you should:
 - 6.2.1. Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
 - 6.2.2. Stay calm and do not show that you are shocked or upset.
 - 6.2.3. Tell the child they have done the right thing in telling you. Do not tell them they should have told someone sooner.
 - 6.2.4. Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
 - 6.2.5. Write up your conversation immediately in the child's own words. Keep it factual and do not include your own judgement.
 - 6.2.6. Sign and date the written record and pass it on immediately to the school DSL or Principal.
- 6.3. If a child is in immediate danger
 - 6.3.1. Wherever possible, speak to the DSL or Principal, first to agree a course of action. Alternatively, make a referral to the local safeguarding partnership directly and/or the police immediately if a child is *in immediate danger or at risk of harm*. Anyone can make a referral.
 - 6.3.2. Tell the DSL or Principal, as soon as possible if you make a referral directly.
 - 6.3.3. You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action. The government website: <https://www.gov.uk/report-child-abuse> provides information on reporting abuse locally.
- 6.4. If you have concerns about a child (as opposed to a child being in immediate danger):
 - 6.4.1. The flowchart in Part 1 (Actions Where There Are Concerns About a Child) of [KCSIE](#) demonstrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger. The first stage emphasises the need for staff to take immediate action where they have a concern about a child. In all cases, the wishes of the child must remain paramount.
 - 6.4.2. The DSL will keep the case under constant review and If it is appropriate to refer the case to the relevant agency within our local safeguarding partnership. the DSL will make the referral or support you to do so. See the flowchart in part 1 for further details of the referral process.
 - 6.4.3. The local safeguarding partnership will make a decision within one working day of a referral about the course of action and will inform the referrer of the outcome. The DSL or person who

made the referral must follow up with the local authority if this information is not available and ensure outcomes are properly recorded.

- 6.4.4. The NSPCC has a dedicated helpline if you have a concern about a child: 0800 028 0285 or you can contact the charity at: help@NSPCC.org.uk.
- 6.4.5. The DSL and any deputies will liaise with the three safeguarding partners and work with other agencies in line with [Working Together to Safeguard Children](#) and [NPCC- When to call the police](#).

7. Specific safeguarding concerns

7.1. Radicalisation and extremism

- 7.1.1. If a child is not at immediate risk of harm, where possible, always speak to the DSL first. Alternatively make a referral to a local three way multi agency partnership directly if appropriate, but you must inform the DSL of the referral. See [KCSIE](#) for further details of preventing radicalisation.
- 7.1.2. Where there is a concern, the DSL will consider the level of risk and decide to which agency this concern should be referred. This could include [Channel guidance](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism.
- 7.1.3. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that school staff can call to raise concerns about extremism with respect to a pupil. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
 - 7.1.3.1. Think someone is in immediate danger.
 - 7.1.3.2. Think someone may be travelling to join an extremist group.
 - 7.1.3.3. See or hear something that may be terrorist related.

7.2. So called 'Honour based abuse' including Female Genital Mutilation (FGM), Breast Ironing, Forced Marriage and violence against women and girls.

- 7.2.1. **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. Possible indicators are provided in [KCSIE](#).
- 7.2.2. **Any teacher** that discovers that an act of FGM appears to have been carried out on a pupil under 18 **must** immediately report this to the police, personally. This is a statutory duty under the Serious Crime Act 2015. Teachers will face disciplinary sanctions for failing to meet this duty. The above duty does not apply in cases where a pupil is at risk of FGM or FGM is suspected but not known to have been carried out. Staff should not examine pupils.
- 7.2.3. **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a pupil under 18 (or at risk of this procedure) must speak to the DSL and follow our local safeguarding procedures. Any member of staff who suspects a pupil is at risk of FGM, must inform the DSL.

- 7.2.4. **Forced marriage:** Our staff are aware that forcing a person into marriage is a crime in England and Wales i.e. 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. In addition, effective February 2023 it is a crime 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 are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.
- 7.2.5. In addition, effective February 2023 it is a crime 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 are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.
- 7.2.6. 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.
- 7.2.7. Further information is available from [The Right to Choose: Government guidance on Forced Marriage.](#)
- 7.2.8. If a member of staff suspects that a pupil is being forced into marriage, they should speak to the pupil about their concerns in a secure and private place and then report this to the DSL, who will follow the procedures in [KCSIE](#)
- 7.2.9. **Breast ironing:** We are aware of this practice and will help staff to be vigilant to any signs of such abuse. See [KCSIE](#) for further information.

7.3. [Child on child abuse including sexual harassment and sexual violence](#)

- 7.3.1. All staff should be aware that children can abuse other children (child on child abuse) and that it can happen both inside and outside of the school and online. We advise all staff working with children and young people to maintain an attitude of ‘**it could happen here**’.
- 7.3.2. All staff recognise the indicators and signs of child on child abuse (see [KCSIE](#)) and know how to identify it and respond to reports. All staff **must** take any reports from victims seriously. We refer to the guidance relating to sexual violence and sexual harassment in Part 5 of [KCSIE](#) identify and respond to reports of any sexual violence and harassment regardless of whether the incident occurred in or out of the school.
- 7.3.3. We are alert to the fact that children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. We are vigilant to these signs and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child’s distress is.
- 7.3.4. We follow the procedures within our [harmful sexual behaviour policy](#) to ensure that both victim and alleged perpetrator are fully supported.

7.4. Child Criminal Exploitation (CCE)

- 7.4.1. We are aware that this includes children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, committing vehicle crime or threatening/committing serious violence to others.
- 7.4.2. We understand that children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.
- 7.4.3. We realise that as children become involved in criminal exploitation, they often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
- 7.4.4. We understand that the experience of girls who are criminally exploited can be very different to that of boys as the indicators may not be the same. However, both boys and girls being criminally exploited may be at higher risk of sexual exploitation. See [KCSIE](#).
- 7.4.5. Key indicators include that pupils: go missing and are subsequently found in areas away from home; are 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 that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters; have their bank accounts used to facilitate drug dealing. Further information on the signs of a child's involvement in county lines is available here: [Criminal exploitation of children and vulnerable adults: county lines](#) and [Home Office and The Children's Society County Lines Toolkit For Professionals](#)

7.5. Child Sexual Exploitation (CSE) - a form of child sexual abuse

- 7.5.1. We are aware that this may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. See [KCSIE](#)
- 7.5.2. We are also aware that 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 of grooming a child in preparation for abuse including via the internet.
- 7.5.3. 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.
- 7.5.4. 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.
- 7.5.5. Key indicators include pupils have older boyfriends or girlfriends; and suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or

become pregnant. See further indicators in the Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

7.6. Serious Violence

- 7.6.1. Staff are aware of the indicators, which may signal pupils are at risk from, or are involved with serious violent crime including increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, unexplained gifts or new possessions. See [KCSIE](#).
- 7.6.2. We alert our staff to the risk factors which increase the likelihood of involvement in serious violence, including being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.
- 7.6.3. We follow the guidance provided in the [Home Office's Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#).

7.7. Child Abduction and Community Safety Incidents

- 7.7.1. Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. This can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers (see [KCSIE](#)).
- 7.7.2. Other community safety incidents near a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.
- 7.7.3. Once children start walking to school on their own it is important they are given practical advice on how to keep themselves safe. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

7.8. Modern Slavery and the National Referral Mechanism

- 7.8.1. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour and can include: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. [KCSIE](#).
- 7.8.2. Further information on the support available to victims and how to refer them to the NRM is available in the [Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims](#) - GOV.UK (www.gov.uk)

7.9. Cybercrime

- 7.9.1. We are aware that cybercrime is a criminal activity committed using computers and/or the internet and that pupils with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. See [KCSIE](#).

7.9.2. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the [Cyber Choices programme](#).

7.9.3. Information security and access management

7.9.3.1. Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

7.9.4. Guidance on e-security is available from the National Education Network.

7.10. Homelessness

7.10.1. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The school DSL (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

7.10.2. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm. See also [KCSIE](#)

7.11. Domestic Abuse

7.11.1. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse) See also [KCSIE](#).

7.11.2. Domestic abuse can encompass a wide range of behaviours and may be a single incident, or a pattern of incidents. The abuse can be, but is not limited to be psychological, physical, sexual, financial or emotional which may have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Children may blame themselves for the abuse or for having to leave the family home as a result.

7.11.3. Young people can also experience domestic abuse within their own intimate relationships. as 'teenage relationship abuse'. If one or both parties are under 16, this may not be recognised in law under the statutory definition of 'domestic abuse'. Child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

7.11.4. **Operation Encompass operates** in all police forces and helps police and schools work together to provide emotional and practical help to children. This ensures that when police attend an incident of domestic abuse, where children may have experienced the domestic incident, the police will inform the DSL in school before the child or children arrive at school the next day.

7.11.5. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced

domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

- 7.11.6. See also [National Domestic Abuse Helpline](#) run by Refuge. This line can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- 7.11.6.1. [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)

- 7.11.6.2. [Refuge what is domestic violence/effects of domestic violence on children](#)

- 7.11.6.3. [Safe Young Lives: Young people and domestic abuse | Safelives](#)

- 7.11.6.4. [Domestic abuse: specialist sources of support](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

8. Our approach to teaching pupils about staying safe.

8.1. Safeguarding risks

- 8.1.1. Pupils will be taught about the range of safeguarding risks above including online safety within the RE/RSHE/PSHE curriculum within specifically dedicated lessons. Pupils will be taught, in an age appropriate and developmentally appropriate way, about how staying safe and they can develop and maintain healthy relationships in accordance with [DfE guidance](#). Each CBAT school has their own RSHE policy.
- 8.1.2. Assemblies and external speakers may be used to complement curriculum delivery.
- 8.1.3. Pupils will be taught about staying safe online in accordance with [KCSIE](#) and also as outlined in: [Education for a connected world](#); National Crime Agency's CEOP education programme: [Thinkuknow](#). The safe use of social media and the internet will also be covered in other subjects where relevant for example within Computing and IT.

8.2. Mental health and wellbeing

- 8.2.1. We know that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that all staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education and sources of support.

9. Allegations against staff and low-level concerns

9.1. Allegations /concerns about a staff member, supply staff or volunteer

- 9.1.1. Allegations 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. Any concerns that meet the harms threshold will be dealt with appropriately in line with CBAT policy.

- 9.1.2. If you have concerns about a member of staff, supply staff, or volunteer, speak to the principal. If you have concerns about the principal, speak to CBAT's CEO, Duncan Cook. The principal/headteacher/CEO/DSL must then follow the procedures within CBAT policy.
- 9.1.3. Where behaviour towards a child does not meet the threshold of harm, is not considered serious enough for a LADO referral and may just cause a sense of unease or nagging doubt, this is classed as a '**low level concern**'. The processes and procedures for dealing with low level concerns are contained within [KCSIE](#) - low level concerns.
- 9.1.4. Allegations made against an external organisation or individual. These include for example community groups, sports associations or other service providers running extra-curricular activities. These should be reported to the Principal and a LADO referral made if a safeguarding allegation is made by a school against an external individual or organisation.

9.2. Record keeping

- 9.2.1. Using our CPOMs safeguarding recording system, we will keep clear, detailed, accurate, records of concerns about children (noting the date, event, action taken and evaluation), where there is no need to refer the matter to social care immediately.
- 9.2.2. These records will demonstrate a timely response to the initial concern and expedient and effective liaison with external agencies as appropriate.
- 9.2.3. Cases must be marked as 'closed' once all actions have been taken and the particular incident is resolved in the best interests of the child.
- 9.2.4. Any confidential, historic written information and records will be held securely in a lockable, fire safe cabinet in a locked location until they are transferred to CPOMs. Keys will not be removed from the school site and should be kept in a locked cabinet or key coded box and only available to those who have a right or a professional need to see them.

9.3. Confidentiality and information sharing

- 9.3.1. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes and that we have the power to share, hold and use this information for such purposes.
- 9.3.2. We must be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care: [Safeguarding practitioners information sharing guidance](#).
- 9.3.3. Child protection information will be held and handled in line with the Data Protection Act 2018 GDPR regulations and in line with ICO guidance '[For Organisations](#)'. We fulfil our duty to process personal information fairly and lawfully and to keep the information safe and secure. Therefore, any safeguarding information is treated as 'special category personal data'. School staff follow the guidance within [Data protection: toolkit for schools](#) to ensure compliance with the GDPR. See [Working Together to Safeguard Children](#).
- 9.3.4. Fears about sharing this special category personal data must not be allowed to stand in the way of the sharing of this information without consent where there is good reason to do so, and doing so will enhance the safeguarding of a child in a timely manner. It cannot be

reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk. The need to promote the welfare and protect the safety of children must always be the paramount concern.

- 9.3.5. School DSLs or deputies must securely send protection records to a receiving school or academy, when the pupil concerned moves school. This must be within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school to have support in place for when the child arrives. The DSL must consider whether this information needs to be shared prior to the pupil starting at the new school.
- 9.3.6. Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. Such a request should be referred to the DSL, or Principal.
- 9.3.7. Where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, our staff must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools will seek legal advice.

9.4. Evaluating the effectiveness of safeguarding systems and procedures

- 9.4.1. To secure evidence that safeguarding is secure within schools, we utilise the GCC KCSiE Safeguarding Assurance Declaration.
- 9.4.2. As part of this framework, it is recommended that the **Safeguarding Self Audit** and resultant **actions** are reviewed every six weeks.
- 9.4.3. The Trust CEO and partnership trust's Regional Education Director will then undertake a compliance check, quality assuring the audit, evidence and subsequent actions.
- 9.4.4. Principals need to ensure any actions are implemented promptly. In the case of urgent issues, action should be taken immediately.

10. Alternative Provision

- 10.1. The Principal must ensure that all of the checks within our standard operating procedures are completed before a pupil commences any placement. The school has an ongoing responsibility for pupils placed in Alternative provision.
- 10.2. The Principal must ensure that the Alternative Provision recording document is reviewed and maintained, detailing all of the safeguarding, wellbeing and progress checks made on pupils at the provision. This will include:
 - 10.2.1. Obtaining written confirmation that the AP provider has carried out all necessary safer recruitment checks on its staff.
 - 10.2.2. Remaining fully aware of the address where the pupil is being educated.
 - 10.2.3. Reviewing AP placements at least half-termly to ensure the child is attending, their needs are being met, and the setting remains safe.

10.3. Use of school premises for non-school activities

- 10.3.1. Where the Trust or school hires or rents out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.
- 10.3.2. Schools may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegation, schools should follow their safeguarding policies and procedures, including informing the LADO as appropriate.
- 10.3.3. Schools may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegation, schools should follow their safeguarding policies and procedures, including informing the LADO.
- 10.3.4. The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that schools should expect these providers to have in place.

11. **Children who are absent from education**

- 11.1. Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.
- 11.2. It is important the school's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.
- 11.3. Further information and support, includes:
 - 11.3.1. Guidance on school attendance 'Working together to improve school attendance' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
 - 11.3.2. Information regarding schools' duties regarding children missing education, including information schools must be provided to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education.
 - 11.3.3. Further information for schools providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges.
 - 11.3.4. General information and advice for schools can be found in the Government's Missing Children and Adults Strategy.

- 11.4. Pupils who are absent or missing from education can be a warning sign of a range of safeguarding concerns including sexual abuse, sexual exploitation or child criminal exploitation.

12. Safer recruitment

- 12.1. We follow the guidance within KCSIE in our recruitment processes, detailed within our Recruitment Policy. We are aware that online checks should be made on shortlisted candidates and as good practice, shortlisted candidates are informed that online searches will be carried out.
- 12.2. It is a requirement for our schools to ensure that the individuals they employ are not disqualified under the 2018 Childcare Disqualification Regulations. This applies to all staff who work with children when they are employed or engaged to provide early years childcare (this covers the age range from birth until 1 September following a child's fifth birthday, that is up to and including reception year), or later years childcare (this covers children above reception age) but who have not attained the age of 8. This requirement applies to employees in nursery, primary or secondary school settings, or if they are directly concerned with the management of such childcare. Staff in secondary schools will only come into scope if they provide childcare or manage the childcare provision for those children covered by these arrangements. are not disqualified from working with children who have not yet reached the age of 8. Further guidance for this requirement is set out in [KCSIE](#).
- 12.3. CBAT Employees who work in these settings will be required to confirm that they are **not disqualified** from working in the specified settings referenced above.
- 12.4. In the event an employee should become disqualified they should immediately inform their Principal of their disqualification, who will immediately advise the HR team.
- 12.5. As part of the short-listing process potential applicants must be informed that online searches will be carried out as part of due diligence checks ahead of their interview.

13. Complaints about safeguarding provision

- 13.1. Any parent wishing to make a complaint about provision at the school should be directed to follow our Complaints Policy.

Appendix 1 - Harmful Sexual Behaviour Policy

1. Our commitment

- 1.1. We are committed to ensuring the safety of our children and has compiled this policy on the basis of the revised DfE guidance within part 5 of KCSIE and the Ofsted Review in Review of [Sexual Abuse in Schools](#).
- 1.2. The sexual abuse of children by other children is a specific safeguarding issue in education and is detailed within part 5 of KCSIE. This policy must therefore be read in conjunction with our safeguarding & child protection policy.
- 1.3. We therefore work to ensure that the welfare of each individual child is paramount. The Trust will deliver this by:
 - 1.1.1. Ensuring that appropriate action is taken in a timely manner to safeguard and promote children's physical and mental welfare.
 - 1.1.2. Ensuring that all staff are aware of their statutory responsibilities with respect to safeguarding.
 - 1.1.3. Ensuring that staff are properly trained in recognising and reporting safeguarding issues.

2. Policy statement

- 2.1. This policy forms part of our safeguarding and child protection policies and procedures.
- 2.2. We recognise that children are vulnerable to and capable of abusing their peers. We take such abuse as seriously as abuse perpetrated by an adult. This includes verbal as well as physical abuse.
- 2.3. Child on child abuse will not be tolerated or passed off as part of "banter" or "growing up". We are committed to a Trust wide approach to ensure the prevention, early identification and appropriate management of child-on-child abuse within our Trust and beyond.
- 2.4. In cases where child on child abuse is identified we will follow our child protection procedures, taking a contextual approach to support all children and young people who have been affected by the situation.
- 2.5. We recognise that child on child abuse can manifest itself in many ways such as: child sexual exploitation, sexting or youth produced digital imagery including artificial Intelligence (AI) generated images , upskirting, bullying, radicalisation, abuse in intimate relationships, children who display sexually harmful behaviour, gang association and serious violence (County Lines) and that technology can be used for bullying and other abusive behaviour.
- 2.6. Some of these behaviours will need to be handled with reference to other policies such as the behaviour policy, anti-bullying policy, child protection policy and online safety policy. This policy concentrates on child-on-child abuse in the context of sexual harassment and sexual violence. It is compliant with the statutory guidance on child-on-child abuse as set out in KCSIE and should be read in conjunction with our local safeguarding partnership safeguarding partnership policy and procedures, and any relevant practice guidance.

3. Definition of sexual abuse

- 3.1. 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.
- 3.2. 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.
- 3.3. Sexual abuse can take place online, and technology and AI can be used to facilitate offline abuse.

4. Harmful Sexual Behaviour (HSB)

- 4.1. Harmful sexual behaviour is a type of child-on-child abuse and can occur between children of any age. Harmful sexual behaviour is problematic, abusive and violent behaviour by a child/young person that is developmentally inappropriate and may cause developmental damage. HSB can occur online, including AI and/or face to face and can also occur simultaneously between the two.
- 4.2. Examples of harmful sexual behaviour include:
 - 4.2.1. **Sexual harassment** – unwanted conduct of a sexual nature which makes someone feel intimidated, degraded, or humiliated, such as sexualised gestures and unwanted sexually explicit and/or derogatory, degrading, homophobic, or misogynistic comments (e.g. ‘slut’ or ‘slag’). This includes making sexual comments or jokes, physical contact such as touching or interfering with clothing or displaying sexual images. It also includes online harassment.
 - 4.2.2. **Sexual violence** – Sexual violence is defined as any act which is an offence under the Sexual Offences Act 2003 and includes engaging in (or causing someone to engage in) sexual activity without consent, whether this is physical (such as rape, assault by penetration, and sexual touching without consent) or online (such as the sharing of nude and semi-nude images and/or videos of children, including ‘revenge porn’. See also 4.3 below.
 - 4.2.3. **Sexual violence and sexual harassment** can occur between two children of any age and sex or a group of children sexually assaulting or sexually harassing a single child or group of children. The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing.
 - 4.2.4. Children and young people can experience harmful sexual behaviour in various settings. This includes at school, at home (or at another home), in public places, and online. At school, issues can occur in places which are supervised and unsupervised. For example, abuse may occur in toilets, corridors, changing areas, common rooms, outside spaces such as the playground and sports facilities, and when pupils are travelling home.
 - 4.2.5. Key features of harmful sexual behaviour include **misuse of power, coercion, violence, and lack of informed or free consent**. There can often be a significant age gap (generally of more than two years) between children who engage in the behaviour. See also Appendix 1.

4.3. Harmful sexual behaviour can manifest itself in many ways. This may include:

- 4.3.1. abuse in intimate personal relationships between peers;
- 4.3.2. sexual violence, including rape, assault by penetration and sexual assault;
- 4.3.3. sexual harassment, including sexual comments, remarks, jokes, online sexual harassment which may be part of a broader pattern of abuse.
- 4.3.4. 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;
- 4.3.5. consensual and non-consensual sharing of nudes and semi nudes images and or video. Also known as sexting or youth produced sexual imagery.
- 4.3.6. 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*)
- 4.3.7. upskirting- This also refers to the practice of ‘upskirting’, which has been made a criminal offence under the Voyeurism Act 2019. This practice *‘typically involves taking a picture under a person’s clothing without them knowing with the specific intention of viewing their genitals or buttocks to gain sexual gratification, or cause the victim humiliation, distress or alarm’*.
- 4.3.8. In assessing harmful sexual behaviours, colleagues should refer to the continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant as shown below. This model was first proposed by Simon Hackett in 2010 and has been updated in 2019.

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	• Single instances of inappropriate sexual behaviour	• Problematic and concerning behaviours	• Victimising intent or outcome	• Physically violent sexual abuse
Socially acceptable	• Socially acceptable behaviour within peer group	• Developmentally unusual and socially unexpected	• Includes misuse of power	• Highly intrusive
Consensual, mutual, reciprocal	• Context for behaviour may be inappropriate	• No overt elements of victimisation	• Coercion and force to ensure victim compliance	• Instrumental violence which is physiologically and/or sexually arousing to the perpetrator
Shared decision making	• Generally consensual and reciprocal	• Consent issues may be unclear	• Intrusive	• Sadism
		• May lack reciprocity or equal power	• Informed consent lacking, or not able to be freely given by victim	
		• May include levels of compulsivity	• May include elements of expressive violence	

4.4. Causes of harmful sexual behaviour

- 4.4.1. The causes of sexual harassment and sexual violence in school are often complex and different for each child, but may include:
- 4.4.2. Normalisation of the behaviour in society through pornography – which rarely shows or deals with issues of mutual consent and respect – and popular culture (e.g. song lyrics, video games, and TV shows). Adolescents are particularly vulnerable to feeling pressure to ‘fit in’ with what they perceive to be normal.
- 4.4.3. Past experience of maltreatment or abuse – according to Hackett et al. (2013), 50% of children displaying harmful sexual behaviour have experienced sexual abuse, and two thirds have experienced another kind of abuse or neglect (Hackett et al., 2016). Children may also have experienced poor sexual boundaries at home, such as family members performing sexual acts with the door open or with the child in the room.
- 4.4.4. Alcohol or drug use.
- 4.4.5. Intense emotions and a lack of strategies for dealing with them.
- 4.4.6. Few or no negative consequences resulting from their behaviour.
- 4.4.7. The availability of websites and chat apps that can be used to share sexual imagery easily and instantly, with little thought about the potential consequences.

4.5. Vulnerabilities

- 4.5.1. We recognise that while all pupils are capable of abusing their peers, some pupils are potentially more at risk. Evidence shows that girls, pupils with SEND and LGBT children are at greater risk as are those who have other protected characteristics.
- 4.5.2. We are aware that pupils with SEND are more likely to be abused than their peers and that additional barriers can sometimes exist when recognising abuse in SEND children including:
 - 4.5.2.1. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
 - 4.5.2.2. the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and
 - 4.5.2.3. communication barriers and difficulties overcoming these barriers.
- 4.5.3. Any reports of abuse involving children with SEND will therefore require close liaison with the DSL (or deputy) and SENDCO.
- 4.5.4. We recognise that some pupils, including young children and those with SEND, may not make an allegation of child -on-child abuse due to their cognition. However, some behaviour may need to be recognised as child -to-child abuse and responded to accordingly.
- 4.5.5. Pupils who are lesbian, gay, bi, or trans (LGBT) can be targeted by their child s. In some cases, a child who is perceived by children of their own age to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

- 4.5.6. Other vulnerable pupils include those with experience of abuse within their family; living with domestic violence; young people in care; children who go missing.
- 4.5.7. Whilst research tells us girls are more frequently identified as being abused by their children of their own age and girls are more likely to experience unwanted sexual touching in schools, this type of abuse is not confined to girls.
- 4.5.8. Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour. Boys report high levels of victimisation in areas where they are affected by gangs. We recognise that both boys and girls experience child on child abuse, but they do so in gendered ways.
- 4.5.9. We are aware that staff can be victims of sexual violence and sexual harassment. and we have arrangements in place to protect our staff from such abuse, including clear reporting and support mechanisms.

5. Minimising the risk of harmful sexual harmful sexual behaviour: Pupils

- 5.1. Our school is proactive in seeking to raise awareness of and prevent all forms of child -on-child abuse by educating all pupils, senior leadership teams, staff and volunteers, and parents about this issue. This will include training all senior leadership teams, staff and volunteers on the nature, prevalence and effect of child -on-child abuse, and how to prevent, identify and respond to it.
- 5.2. We ensure that our staff and volunteers have an understanding of the specific criminal offences under the Sexual Offences Act 2003 and the importance of consent, in particular whether consent to sexual acts is given freely by someone with the capacity to choose and in the absence of any duress or exploitation.
- 5.3. Our school is proactive in seeking to raise awareness of and prevent all forms of child-on-child abuse by educating all pupils, senior leadership teams, staff and volunteers, and parents about this issue. This will include training all senior leadership teams, staff and volunteers on the nature, prevalence and effect of child -on-child abuse, and how to prevent, identify and respond to it.
- 5.4. This includes (a) Contextual Safeguarding; (b) The identification and classification of specific behaviours; and (c) The importance of taking seriously all forms of child -on-child abuse (no matter how low level they may appear) and ensuring that no form of child -on-child abuse is ever dismissed as horseplay or teasing.
- 5.5. The principle aim of our approach is to foster the conditions in which our pupils can aspire to and realise safe and healthy relationships, at school and as they continue in life. We create a culture where the voice of the pupil/child is heard, where pupils feel able to share their concerns openly, knowing that they will be listened to, and that they will not be judged.
- 5.6. Our priority is to create a secure environment in which our pupils and young people can aspire to and realise safe and healthy relationships. We will do this by:
 - 5.6.1. Creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment, and to know that these concerns will be taken seriously.

- 5.6.2. Using sex, education and PHSE education in secondary to help our pupils understand, in an age-appropriate way, what harmful sexual behaviour is, including by children. We ensure this curriculum is developed to also consider the stage of development especially when considering SEND pupils and their cognitive understanding.
- 5.6.3. Teaching them the knowledge they need to recognise and report abuse, including emotional, physical, and sexual abuse.
- 5.6.4. Teaching them about the importance of making sensible decisions to stay safe (including online), whilst being clear that if they should suffer any abuse, it is never their fault.
- 5.6.5. We help our pupils to develop the skills to understand:
 - 5.6.5.1. what constitutes harmful sexual behaviour;
 - 5.6.5.2. that such behaviour is not acceptable;
 - 5.6.5.3. the possible reasons for such behaviour, and vulnerability of perpetrators; that they must tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable – and must tell a trusted adult if they witness such behaviour towards others.
 - 5.6.5.4. healthy and respectful relationships;
 - 5.6.5.5. what respectful behaviour looks like;
 - 5.6.5.6. consent;
 - 5.6.5.7. stereotyping, equality;
 - 5.6.5.8. body confidence and self-esteem;
 - 5.6.5.9. prejudiced behaviour;
 - 5.6.5.10. that sexual violence and sexual harassment is always wrong; and addressing cultures of sexual harassment.

6. Minimising the risk of harmful sexual behaviour: School staff

- 6.1. Our staff and volunteers receive annual safeguarding training both regarding the different types of abuse and neglect; this includes information about harmful sexual behaviour as well as our expectations for staff vigilance at all times. Staff also receive regular updates on safeguarding issues throughout the school year, including about the nature and prevalence of harmful sexual behaviour, where appropriate.
- 6.2. Our training process also ensures that our staff know what to do if they receive a report that harmful sexual behaviour may have occurred, including how to support the young person concerned as well as the alleged perpetrator. Our staff recognise that harmful sexual behaviour can negatively impact both the child experiencing it and the child displaying it, in terms of their physical and emotional wellbeing.

- 6.3. All staff are aware that children can abuse other children and that it can happen both inside and outside of the school and online. We advise all staff working with children and young people to maintain an attitude of ‘it could happen here’.
- 6.4. All staff recognise the indicators and signs of child-on-child abuse as outlined in our Safeguarding and Child Protection policy and know how to identify it and respond to reports.
- 6.5. We train our staff to refer to the guidance in KCSIE, to identify and respond to reports of any sexual violence and harassment regardless of whether the incident occurred in or out of the school.
- 6.6. All staff understand that even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported. If staff have any concerns regarding child-on-child abuse they must speak to their DSL team, as identified on the school’s safeguarding arrangements on the school website.
- 6.7. All staff **must** challenge any inappropriate behaviours between children. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- 6.8. All staff must be aware that some safeguarding issues can manifest themselves via child-on-child abuse.
- 6.9. Our staff are aware of our policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. Clear processes as to how victims, perpetrators and any other children affected by child-on-child abuse will be supported; See Appendix 1 below.
- 6.10. All staff will reassure victims 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 abuse, sexual violence or sexual harassment. A victim will never be made to feel ashamed for making a report.

7. Minimising the risk of harmful sexual behaviour: Parents

- 7.1. We continually work in collaboration with our parents and carers to ensure the safety of their children and to reinforce key messages from the school at home.
- 7.2. We share these messages through our online newsletters and updates.
- 7.3. We also engage with our parents on this issue by:
 - 7.3.1. Talking about it with parents, both in groups and one to one;
 - 7.3.2. Asking parents what they perceive to be the risks facing their child and how they would like to see the school address those risks;
 - 7.3.3. Involving parents in the review of school policies and the RSE curriculum.
- 7.4. We will ensure that our parents and carers are informed about:
 - 7.4.1. the nature of harmful sexual behaviour;

- 7.4.2. the effects of harmful sexual behaviour on their child;
- 7.4.3. the likely indicators that such behaviour may be taking place;
- 7.4.4. what to do if it is suspected that child on child sexual abuse has occurred;

8. Responding to an incident / allegation

8.1. Initial actions

- 8.1.1. Pupils reporting a concern **must** be treated respectfully and reassured that they are being taken seriously and that they will be fully supported and kept safe. They must never be made to feel they are creating a problem by reporting abuse or made to feel ashamed.
- 8.1.2. Staff must never promise confidentiality to the pupil as the concern they are raising will need to be shared further. The school Designated Safeguarding Lead must be informed immediately of any incident. The school DSL must also inform the Trust DSL or Deputy DSL within two hours of the report of the incident and complete the serious / critical incident reporting form as appropriate.
- 8.1.3. The incident may also need to be shared with our local safeguarding partnership safeguarding partners including: Children's Social Care, the police and potentially other external agencies.
- 8.1.4. The next steps must be explained to the pupil so that they are aware of what will happen and who will be contacted.
- 8.1.5. Where a pupil already has social care involvement (e.g. LAC, CP or CIN), the child's social worker must be informed immediately, and we will work with them to ensure the best outcomes for the child.
- 8.1.6. During these initial steps, consideration must be given to the best way to keep the victim and the alleged perpetrator within a safe distance of each other in lessons and social times and on the way to and from school. See risk assessment in 8.3 below.
- 8.1.7. If there is an online element to the incident, advice will be taken from the other safeguarding partners as appropriate. School staff will not view an indecent image of a pupil, nor forward this for any reason.

8.2. Recording an incident / allegation

- 8.2.1. The information relating to the incident must be recorded in line with our Safeguarding and Child Protection policy.
- 8.2.2. Any member of staff receiving a disclosure of harmful sexual behaviour or noticing signs or indicators of this, will record it immediately, noting what was said or seen (if appropriate, using a body map to record), giving the date, time and location. The facts will be recorded as the pupil has explained them.
- 8.2.3. If the pupil is at immediate risk of harm, the member of staff should inform the DSL immediately and deal with recording as soon as possible subsequently.

- 8.2.4. The record will then be given to the school DSL, who will decide on the most appropriate action and record this accordingly onto CPOMs using our child-on-child abuse categories. The school DSL must inform the Trust DSL within two hours and complete and submit the serious/critical incident reporting form as appropriate.
- 8.2.5. All related concerns, discussions, decisions, and reasons for decisions will be dated and signed and will include the action taken. This record may form part of a statutory assessment by Children's Social Care or other external agency.

8.3. Risk Assessment

- 8.3.1. Upon a report of any HSB, the school DSL will make an immediate risk and needs assessment. This will be completed on an individual basis for each pupil involved in the incident.
- 8.3.2. Parents and carers will be invited to contribute to the completion and review of the risk assessment.
- 8.3.3. The risk assessment for each pupil will be reviewed regularly to ensure that these remain relevant and fit for purpose.
- 8.3.4. We will also consider all other pupils at our school and any actions that may be appropriate to protect them such as relevant assemblies or RSE/PSHE input.
- 8.3.5. The risk and needs' assessment should consider:
- The victim, especially their protection and support;
 - The alleged perpetrator; and
 - All the other children (and, if appropriate, adult students and staff) in the school, especially any actions that are appropriate to protect them;
- 8.3.6. Risk assessments will be recorded (written or electronic say where these are filed) and be kept under review. The designated safeguarding lead (or a deputy) will ensure they are engaging with the appropriate safeguarding partners or other external agencies.

8.4. Considerations

- 8.4.1. Of paramount importance is the wishes of the victim in terms of how they want to proceed.
- 8.4.2. The nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour. The NSPCC harmful sexual behaviour toolkit will be useful in assessing the nature of the alleged incident.
- 8.4.3. The ages of the children involved;
- 8.4.4. The developmental stages of the children involved;
- 8.4.5. Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty? This resource may be helpful: Childnet - STAR SEND Toolkit as it equips,

enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.

- 8.4.6. If the alleged incident is a one-off or a sustained pattern of abuse. Are there ongoing risks to the victim, other children, adult students or school staff; and other related issues and wider context?

9. Supporting the pupil who has allegedly experienced harmful sexual behaviour

- 9.1. We will assess what short-term and long-term support a pupil may need to help them manage the immediate aftermath of an incident, and to recover from what they have experienced.
- 9.2. A pupil's existing support network will be pivotal in this, and we will work with the local safeguarding partnership and safeguarding partners as appropriate. This will be in accordance with the pupil's wishes and, wherever appropriate, in discussion with parents and carers.
- 9.3 The pupil's immediate needs will be accommodated such as adapting their timetable and in school support. We will ensure that the pupil is protected from any unwanted attention or pressure from another child they may experience or perceive due to making a report.
- 9.4. This work will be guided by a robust risk assessment process see 8.3 above and we will ensure that the pupil and their parents / carers have an opportunity to contribute.
- 9.5. We will also ensure there is regular review of arrangements to be confident they meet the needs of all involved.
- 9.6 It may be necessary to make requests for support to mental health and wellbeing services or for therapeutic intervention. We may also need to link with other agencies to remove inappropriate material from the Internet.

10. Supporting the pupil who has allegedly displayed harmful sexual behaviour

- 10.1. We will protect and support a pupil who is alleged to be a perpetrator or who has displayed abusive or harmful sexual behaviour.
- 10.2. We will do this through considering the needs of the pupil, any risks to their safety and what multi-agency responses are needed to support them and their family. This work will be guided by a robust risk assessment process, and we will ensure that the pupil and their parents and carers have an opportunity to contribute. We will also ensure there is regular review of arrangements to be confident they meet the needs of all involved.
- 10.3. A pupil may not realise they have behaved abusively. We will avoid using language that may make them feel judged or criminalised and ensure that any intervention will be at the least intrusive level required to effectively address the behaviour.
- 10.4. We will consider appropriate sanctions using our behaviour policy, and work with the pupil and their support network to consider measures that may help to address this pupil's behaviour including external, specialist support.

11. Investigating the incident

- 11.1. The school DSL will be responsible for leading investigations, and for liaising with other agencies as appropriate, for example Children's Social Care and the police. They will also be the main point of contact for parents and carers and will ensure that all records of the incident are appropriately maintained. The school DSL will also ensure that the Trust DSL or the Deputy DSL are updated at all stages.

12. Investigation outcomes

- 12.1. We will always seek to ensure that the outcome of an investigation is appropriate and proportionate to the circumstances in relation to the report. There are a number of possible outcomes as detailed below:

- 12.2. Manage internally

- 12.2.1. In some cases, for example, one-off incidents, we may take the view that the Child or young person (CYP) concerned are not in need of early help or statutory intervention. In these cases, we will follow our other school policies in addressing matters, for example our behaviour and anti-bullying policies.
- 12.2.2. We will also consider what support the child or young person/s (CYP) involved may need going forward - for example, pastoral support, counselling services, and ensuring that there is a trusted adult for those affected to speak with if they wish to. We will also consider whether any intervention or support is required as part of a whole setting approach or with the wider school community.

- 12.3. Early Help

- 12.3.1. Where statutory intervention is not required or agreed, we may use early help instead. This means providing support as soon as a problem emerges, at any point in a pupil's life. We will work with parents and carers and other relevant partners when following this approach, which can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation.

- 12.4. Requests for support to Children's Social Care

- 12.4.1. Where a pupil has been harmed, is at risk of harm, or is in immediate danger, we will make an urgent request for support to Children's Social Care. We will generally inform parents and carers of this unless doing so may put a child or young person at additional risk. We will seek advice from other partners on such matters.
- 12.4.2. If we make a request for support, Children's Social Care will consider whether the pupil involved is in need of protection or other services. Where statutory assessments are appropriate, the school will work with Children's Social Care and other agencies as appropriate. Partnership working helps to ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other CYP that require support.
- 12.4.3. In some cases, Children's Social Care will review the evidence and decide a statutory intervention is not appropriate. If a statutory assessment is not considered appropriate by Children's Social Care, we will consider what other support may be required. We will make

further requests for support to Children's Social Care if we consider that a pupil remains in immediate danger or at risk of harm.

12.5. Reporting to the police

- 12.5.1. Where a report of rape, assault by penetration or sexual assault is made, we will always report it to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains.
- 12.5.2. In circumstances where parents or carers have not been informed, we will ensure that we support the pupil in any decision we take. This is likely to be with the support of Children's Social Care and any appropriate specialist agencies.
- 12.5.3. When we have made a report to the police, we will consult with them and agree what information can be disclosed to staff and others, in particular the alleged perpetrator and their parents or carers. We will also discuss the best way to protect the victim and their anonymity.
- 12.5.4. Where there is a criminal investigation, we will work closely with the police and other agencies as appropriate to support all pupils involved (including potential witnesses). This will help to ensure that any actions we take do not jeopardise a police investigation.
- 12.5.5. Where the police decide that no further action is not required, we will continue to engage with other agencies to support the pupil involved.

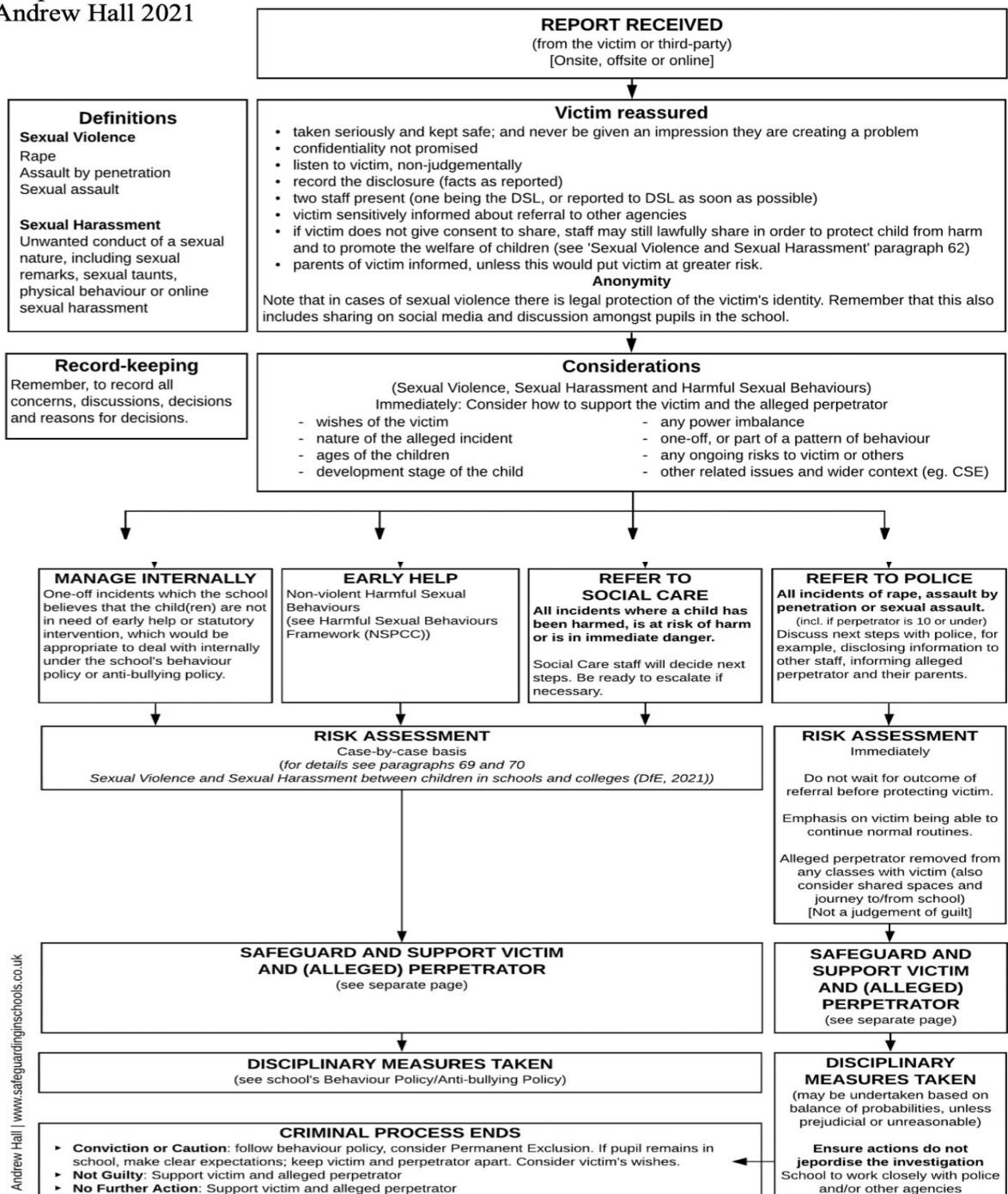
13. Monitoring arrangements

- 13.1. This policy template will be reviewed annually by the Trust Designated Safeguarding lead and deputy.
- 13.2. At each review, the revised template for schools will be approved by the board of trustees with responsibility for implementation delegated to the principal.

14. Harmful Sexual Behaviour Flowchart

TTC Harmful Sexual Behaviour: Flowchart

Adapted from
Andrew Hall 2021



© 2021, Andrew Hall | www.safeguardingschools.co.uk

Source:
*Sexual Violence and Sexual Harassment between children in schools and colleges (DfE, 2021)

SVSH Flow Chart for Schools 2021 v.1.0

- 14.1 Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 14.2 Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.
- 14.3 All staff working with children are advised to maintain an attitude of 'it could happen here'.
- 14.4 Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- 14.5 Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. Schools should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school, including intimate personal relationships.
- 14.6 It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- 14.7. Responding to reports of sexual violence and sexual harassment:
 - 14.7.1. Systems should be in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously.
 - 14.7.2. Schools not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
 - 14.7.3. Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Pre-planning, effective training and effective policies will provide schools with the foundation for a calm, considered and appropriate response to any reports. Proprietors should ensure that the school contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#).
 - 14.7.4. Ultimately, any decisions are for the school to make on a case-by-case basis, with the DSL (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.
- 14.8. The immediate response to a report:
 - 14.8.1. It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

14.8.2 The school's initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

14.8.3 It is essential that all victims are reassured 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. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

14.9 All staff should be trained to manage a report. local safeguarding partnership policies (and training) will dictate exactly how reports should be managed. However, effective safeguarding practice includes:

14.9.2 if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;

14.9.3 where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;

14.9.4 not promising confidentiality at this initial stage as it is likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;

14.9.5 recognising that a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;

14.9.6 recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;

14.9.7 keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;

14.9.8 listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;

14.9.9 considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It

may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;

14.9.10 only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and

14.9.11 informing the designated safeguarding lead (or deputy), as soon as practically possible, if the DSL (or deputy) is not involved in the initial report.

15 Risk assessment

15.8 When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

15.8.2 the victim, especially their protection and support;

15.8.3 whether there may have been other victims,

15.8.4 the alleged perpetrator(s); and

15.8.5 all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

15.9 Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

15.10 The DSL (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school's approach to supporting and protecting their pupils and students and updating their own risk assessment.

16 Action following a report of sexual violence and/or sexual harassment.

16.8 What to consider

16.8.2 Schools should be aware of, and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school. The DSL (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response. Important considerations will include:

- 16.8.3 the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children;
 - 16.8.4 the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
 - 16.8.5 the ages of the children involved;
 - 16.8.6 the developmental stages of the children involved;
 - 16.8.7 any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
 - 16.8.8 if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
 - 16.8.9 that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
 - 16.8.10 are there ongoing risks to the victim, other children, adult students or school staff; and,
 - 16.8.11 other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- 16.9 As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, schools should follow general safeguarding principles as set out throughout this guidance. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).
- 16.10 The starting point regarding any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable, and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

17 Children sharing a classroom

- 17.8 Initial considerations when the report is made: Any report of sexual violence is likely to be traumatic for the victim. Reports of rape and assault by penetration are likely to be especially difficult with regard to the victim, and close proximity with the alleged perpetrator(s) is likely to be especially distressing.
- 17.9 Whilst the school establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim.
- 17.10 The school should also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate.

- 17.11 These actions are in the best interests of all children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s). For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school premises and school transport, should be considered immediately. In all cases, the initial report should be carefully evaluated, reflecting the considerations set out at paragraph.
- 17.12 The wishes of the victim, the nature of the allegations and the protection of all children in the school will be especially important when considering any immediate actions.

18 Options to manage the report.

- 18.8 It is important that schools consider every report on a case-by-case basis.
- 18.9 When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the school should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations.
- 18.10 However, as per general safeguarding principles, this does not and should not stop the school taking immediate action to safeguard their children, where required.
- 18.11 There are four likely scenarios for schools to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school should decide on a course of action. Consideration should be given to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. The four scenarios are:
- 18.11.2 **Manage internally:** In some cases of sexual harassment, for example, one-off incidents, the school may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support. Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).
- 18.11.3 **Early help:** The school may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the Early Help process is and how and where to access support. Multi-agency early help will work best when placed alongside strong school policies, preventative education and engagement with parents and carers. Early help and the option to manage a report internally do not need to be mutually exclusive: a school could

manage internally and seek early help for both the victim and perpetrator(s). Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

18.11.4 Referrals to children's social care: Where a child has been harmed, is at risk of harm, or is in immediate danger, schools should make a referral to local safeguarding partnership and children's social care. At the point of referral to children's social care, schools will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care. If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services. Where statutory assessments are appropriate, the school (especially the designated safeguarding lead or a deputy) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support. Schools should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school. It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the school should be immediate. In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The school (generally led by the designated safeguarding lead or a deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support. Whatever the response, it should be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

18.11.5 Reporting to the Police: Any report to the police will generally be in parallel with a referral to children's social care (as above). It is important that the DSL (and their deputies) are clear about the local safeguarding partnership process for referrals and follow that process. Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. The following advice may help schools decide when to engage the Police and what to expect of them when they do: When to call the police. Where a report has been made to the police, the school should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity. At this stage, schools will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school is

supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies. All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local safeguarding partnerships arrangements. In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school continue to engage with specialist support for the victim and alleged perpetrator(s) as required. Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the DSL (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school take do not jeopardise the police investigation. If schools have questions about the investigation, they should ask the police. The police will help and support the school as much as they can (within the constraints of any legal restrictions). Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

- 18.11.6 **Considering bail conditions:** The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance. Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions. Whatever arrangements are in place, the school will need to consider what additional measures may be necessary to manage any assessed risk of harm that may arise within their institution. Particular regard should be given to: the additional stress and trauma that might be caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to privacy, family life, etc). Careful liaison with the police investigators should help to develop a balanced set of arrangements.
- 18.11.7 **Managing any delays in the criminal process:** There may be delays in any case that is being progressed through the criminal justice system. Schools should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the school.
- 18.11.8 **The end of the criminal process :** If a child is convicted or receives a caution for a sexual offence, the school should update its risk assessment, ensure relevant protections are in place for all the children at the school and, if it has not already, consider any suitable action in line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the same school as the victim, the school should be clear as to their expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable. Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in the school. It will be important that the school ensures both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online). Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty

verdict, the school should continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Schools should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

- 18.11.9 **Unsubstantiated, unfounded, false or malicious reports:** Records of the incident should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed. If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

19 Ongoing response: Safeguarding and supporting the victim

- 19.1 The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim:
- 19.1.1 The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school is a safe space for them.
 - 19.1.2 Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. By the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
 - 19.1.3 The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
 - 19.1.4. Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
 - 19.1.5 Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

19.2 Support can include:

- 19.2.5 Early help and children's social care.
 - 19.2.6 Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service.
 - 19.2.7 The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact [Rape Crisis](#) (England & Wales)
 - 19.2.8 NHS - Help after rape and sexual assault - NHS (www.nhs.uk) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics. o Rape and sexual assault referral centres services can be found at: [Find Rape and sexual assault referral centres](#). Sexual assault referral centres (SARCs) offer medical, practical and emotional support.
 - 19.2.9 Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously. o Childline/IWF: Remove a nude image shared online [Report Remove](#) is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.
- 19.3 Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, schools should ask the victim if they would find it helpful to have a designated trusted adult. The choice of any such adult should be the victim's (as far as reasonably possible). Schools should respect and support this choice.
- 19.4 A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While schools should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, schools should provide a physical space for victims to withdraw.
- 19.5 It may be necessary for schools to maintain arrangements to protect and support the victim for a long time. Schools should be prepared for this and should work with children's social care and other agencies as required.
- 19.6 It is therefore important that the designated safeguarding lead knows how and where to seek support.
- 19.7 It is important that the school does everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.
- 19.8 Whilst they should be given all the necessary support to remain in their school, if the trauma results in the victim being unable to do this, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).
- 19.9 It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The DSL should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate, their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

20 Ongoing Considerations: Victim

- 20.1 Once the DSL (or a deputy) has decided what the next steps will be in terms of progressing the report, they should carefully consider again the question of the victim and alleged perpetrator(s) sharing classes and sharing space at school. This will inevitably involve complex and difficult professional decisions, including considering their duty to safeguard children and their duty to educate them. It is important each report is considered on a case-by-case basis and risk assessments are updated as appropriate. Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator(s) should be removed from any classes they share with the victim. Consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during before and after school-based activities) and on transport to and from school where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s).

21 Maintaining close liaison with the police is essential.

- 21.1 Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in the same school would seriously harm the education or welfare of the victim (and potentially other pupils or students). Where a criminal investigation into sexual assault leads to a conviction or caution, the school consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion.
- 21.2 Where the perpetrator(s) is going to remain at the school, the principle would be to continue keeping the victim and perpetrator(s) in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases. In all cases, leaders should record and be able to justify their decision making.
- 21.3 Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator(s).
- 21.4 Appropriate support should be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis. In all cases, schools should record and be able to justify their decision-making. All of the above should be considered with the needs and wishes of the victim at the heart of the process (supported by parents/ carers as required). Any arrangements should be kept under review.

22 Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour.

- 22.1 The following should help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):

- 22.1.1 The school needs to safeguard the victim (and the wider pupil/student body) and also provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions.
- 22.1.2 Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- 22.1.3 Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- 22.1.4 Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be a symptom of either their own abuse or exposure to abusive practices and or materials.
- 22.1.5 Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police. The NSPCC also provides free and independent advice about HSB: [NSPCC Learning - Protecting children from harmful sexual behaviour](#) and [NSPCC - Harmful sexual behaviour framework](#).
- 22.1.6 It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- 22.1.7 Advice on behaviour and discipline in schools is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair.
- 22.1.8 School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. It is important that if an alleged perpetrator does move to another educational institution that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead should take responsibility to ensure this happens as well as transferring the child protection file.

23 Toolkits

- 23.1 [Childnet - STAR SEND Toolkit](#) equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.
- 23.2 [Childnet - Just a joke?](#) provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.
- 23.3 [Childnet - Step Up, Speak Up](#) a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.

24 Opportunities to teach online safety to pupils

- 24.1 [Education for a connected world](#) framework from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school approach to safeguarding and online safety.
- 24.2 [Teaching online safety](#) in school is departmental guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements.
- 24.3 [Thinkuknow](#) is the National Crime Agency/CEOPs education programme with age specific resources.
- 24.4 [Sexting: responding to incidents and safeguarding children](#) - UK Council for Internet Safety. UK Safer Internet Centre has developed further guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.

25 Advice for Proprietors and senior leaders

- 25.1 [Childnet](#) provide guidance for schools on cyberbullying.
- 25.2 [London Grid for Learning](#) provides advice on all aspects of a school's online safety arrangements.
- 25.3 [NSPCC](#) provides advice on all aspects of a school online safety arrangements.
- 25.4 [Searching screening and confiscation](#) is departmental advice for schools on searching children and confiscating items such as mobile phones.
- 25.5 [Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- 25.6 UK Council for Internet Safety have provided advice on [sexting-in-schools-andcolleges](#) and [using-external-visitors-to-support-online-safety-education](#)

26 Remote education, virtual lessons and live streaming

- 26.1 [Case studies on remote education practice](#) are available for schools to learn from each other.
- 26.2 [Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely](#)
- 26.3 [London Grid for Learning](#) guidance, including platform specific advice.
- 26.4 [National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing.
- 26.5 [National cyber security centre](#) guidance on how to set up and use video conferencing.
- 26.6 [UK Safer Internet Centre](#) guidance on safe remote learning

27 Support for children

- 27.1 [Childline](#) for free and confidential advice
- 27.2 [UK Safer Internet Centre](#) to report and remove harmful online content.

28 Parental support

- 28.1 [Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support.
- 28.2 [Government advice about security and privacy settings](#), blocking unsuitable content, and parental controls.
- 28.3 [Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world.
- 28.4 [London Grid for Learning](#) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online.
- 28.5 [Lucy Faithfull Foundation StopItNow](#) resource can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- 28.6 National Crime Agency/CEOP [Thinkuknow](#) provides support for parents and carers to keep their children safe online.
- 28.7 [Parentzone](#) provides help for parents and carers on how to keep their children safe online.
- 28.8 Parent info from [Parentzone](#) and the National Crime Agency provides support and guidance for parents from leading experts and organisations.
- 28.9 [UK Safer Internet Centre](#) provides tips, advice, guides and other resources to help.

29 Appendix 2 - Online and Digital Safety

Our processes

All staff, including contractors and agency staff, visitors and volunteers must be vigilant to ensure the safe use of online technology and be particularly aware of pupils who may be more vulnerable, e.g. SEND pupils, pupils who are at risk of radicalisation.

Our academy has appropriate internet filtering within our academy, and we utilise Smoothwall to monitor all activity within our suite of applications. Where any user is identified as potentially engaging in a risky or inappropriate activity, the DSL team will take the appropriate action.

We also ensure that our online safeguarding provision remains robust and updated. We therefore conduct an annual review of this provision to ensure that our pupils are secure.

Online safety is a priority within the role of our DSL team, our parental engagement, in our teacher training and our curriculum planning, including the delivery of RSHE.

We ensure our staff are up to date with their online safety knowledge through training with the National Online Safety organisation and its regular updates as we work towards National Online Safety Accredited School status.

We enable access for our parents to engage with regular online safety updates and advisory videos through the National Online Safety organisation.

We will ensure that our online safety provision is robust by conducting an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks our pupils face.

We will ensure that where learning is delivered remotely, we take every precaution to safeguard both our learners and our staff.

DfE guidance:

1. The use of technology has become a significant component of many safeguarding issues: child sexual exploitation, radicalisation and sexual predation; technology often provides the platform that facilitates harm.
2. An effective approach to online safety empowers a school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident, where appropriate.
3. The breadth of issues covered by online safety is considerable, but can be categorised into three areas of risk:
 - 3.1. Content: being exposed to illegal, inappropriate or harmful material, for example, pornography, fake news, racist or radical and extremist views.
 - 3.2. Contact: being subjected to harmful online interaction with other users, for example, commercial advertising, as well as adults posing as children or young adults.
 - 3.3. Conduct: personal online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images or online bullying.
4. Resources that could support schools include:

- 4.1. UKCCIS have recently published their Education for a connected world framework, which provides an approach to the curriculum for a whole school approach to safeguarding and online safety. It covers early years through to age 18.
- 4.2. The PSHE Association provides guidance to schools on developing their PSHE curriculum – www.pshe-association.org.uk
- 4.3. Parent Zone and Google have developed ‘Be Internet Legends’, a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for key stage 2 pupils.

Specific safeguarding issues related to online safety

5. Cyberbullying:

- 5.1. Cyberbullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power. (See also the school behaviour policy.)
- 5.2. 1.2 Cyberbullying can also be a form of peer-on-peer abuse through sexual harassment that happens through the use of technology 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.

6. Preventing and addressing cyber-bullying

- 6.1. To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.
- 6.2. The academy will actively discuss cyberbullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Teachers will discuss cyber-bullying with their classes when appropriate, and the issue will be addressed in assemblies.
- 6.3. Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.
- 6.4. All staff, governors and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training.
- 6.5. The academy also sends information/leaflets on cyber-bullying to parents so that they are aware of the signs, how to report it and how they can support children who may be affected.
- 6.6. In relation to a specific incident of cyber-bullying, the academy will follow the processes set out in the school behaviour policy. Where illegal, inappropriate or harmful material has been spread among pupils, the school will use all reasonable endeavours to ensure the incident is contained.

- 6.7. The DSL will consider whether the incident should be reported to the police if it involves illegal material and will work with external services if deemed appropriate.

7. Preventing radicalisation

- 7.1. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach.
- 7.2. We are particularly vigilant to any online behaviour that suggests any radicalised behaviour through our eSafe programme such as contacts through social media.

Useful links and resources for staff, pupils and parents

Opportunities to teach online safety to pupils:

- [Be Internet Legends](#) developed by Parent Zone and Google is a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for Key Stage 2 pupils.
- [Disrespectnobody](#) is Home Office advice and includes resources on healthy relationships, including sexting and pornography.
- [Education for a connected world](#) framework from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school approach to safeguarding and online safety.
- [PSHE association](#) provides guidance to schools on developing their PSHE curriculum.
- [Teaching online safety](#) in school is departmental guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements.
- [Thinkuknow](#) is the National Crime Agency/CEOPs education programme with age specific resources.
- [Sexting: responding to incidents and safeguarding children](#) - UK Council for Internet Safety. UK Safer Internet Centre has developed further guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.
- Public Health England [Every Mind Matters](#)
- Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

Advice for governing bodies/proprietors and senior leaders

- [Childnet](#) provide guidance for schools on cyberbullying.
- [Educateagainsthate](#) provides practical advice and support on protecting children from extremism and radicalisation.
- [London Grid for Learning](#) provides advice on all aspects of a school's online safety arrangements.
- [NSPCC](#) provides advice on all aspects of a school's online safety arrangements.
- [Searching screening and confiscation](#) is departmental advice for schools on searching children and confiscating items such as mobile phones.
- [South West Grid for Learning](#) provides advice on all aspects of a school's online safety arrangements.
- [Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq

- UK Council for Internet Safety have provided advice on [sexting-in-schools-andcolleges](#) and [using-external-visitors-to-support-online-safety-education](#)

Remote education, virtual lessons and live streaming

- [Case studies on remote education practice](#) are available for schools to learn from each other.
- [Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely](#)
- [London Grid for Learning](#) guidance, including platform specific advice.
- [National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing.
- [National cyber security centre](#) guidance on how to set up and use video conferencing.
- [UK Safer Internet Centre](#) guidance on safe remote learning

Support for children

- [Childline](#) for free and confidential advice
- [UK Safer Internet Centre](#) to report and remove harmful online content.
- [CEOP](#) for advice on making a report about online abuse.

Parental support

- [Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support.
- [Commonsensemedia](#) provide independent reviews, age ratings, & other information about all types of media for children and their parents
- [Government advice about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying](#)
- [Government advice about security and privacy settings](#), blocking unsuitable content, and parental controls.
- [Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world.
- [Let's Talk About It](#) provides advice for parents and carers to keep children safe from online radicalisation.
- [London Grid for Learning](#) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online.
- [Lucy Faithfull Foundation StopItNow](#) resource can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- National Crime Agency/CEOP [Thinkuknow](#) provides support for parents and carers to keep their children safe online.
- [Net-aware](#) provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games.
- [Parentzone](#) provides help for parents and carers on how to keep their children safe online.
- Parent info from [Parentzone](#) and the National Crime Agency provides support and guidance for parents from leading experts and organisations.
- [UK Safer Internet Centre](#) provide tips, advice, guides and other resources to help.