



STONYHURST

AMDG

Academic Year 2025 – 26

SAFEGUARDING AND CHILD PROTECTION POLICY (including EYFS)	
Date of Review	August 2025 Updated March 2026
Reviewed By	College Senior Deputy Head Cross-Campus Designated Safeguarding Lead
Approval Body	The Executive Team The Governing Body
Date Approved	August 2025
Date of Next Review	By 31 st August 2026
Policy Location(s)	Staff Portal Stonyhurst Website Teams Channel

If you would like to request a printed copy of a policy, please contact
compliance@stonyhurst.ac.uk

This document can be made available in large print or in an alternative format on request

The Safeguarding and Child Protection Policy 2025-26 is applicable to the school campus.

This includes Stonyhurst College and Stonyhurst St. Mary's Hall (including EYFS).

The Stonyhurst Child Protection and Safeguarding Policy has regard to the Statutory Guidance, Keeping Children Safe in Education 2025, Prevent 2015 and Working Together to Safeguard Children 2023.

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Key Safeguarding Contacts for School

Key Safeguarding Contacts for School		
Assistant Head Cross-Campus Designated Safeguarding Lead (DSL)	Emma Winstanley	e.winstanley@stonyhurst.ac.uk
Deputy Designated Safeguarding Lead (DDSLs)	Ruth Crossley Samuel Bewick Maxine Roche Claire Wilkinson Sarah Gibson (DDSL with responsibility for the EYFS) Karen Entwistle Fr. Christopher Cann	r.crossley@stonyhurst.ac.uk s.bewick@stonyhurst.ac.uk m.roche@stonyhurst.ac.uk c.wilkinson@stonyhurst.ac.uk s.gibson@stonyhurst.ac.uk k.entwistle@stonyhurst.ac.uk c.cann@stonyhurst.ac.uk
Head - College	Interim Executive Head – Fr Christopher Cann Interim Operational Head – Dr Alice McNeill	c.cann@stonyhurst.ac.uk a.mcneill@stonyhurst.ac.uk
Head - SMH	Fr Christopher Cann	c.cann@stonyhurst.ac.uk
Chair of Governors	Christine Keunen	c.keunen@stonyhurst.ac.uk
Safeguarding Governor	Helen McCormick	h.mccormick@stonyhurst.ac.uk

1. Statement of Intent

1.1 Stonyhurst, a Jesuit Catholic boarding school, is committed to ensuring the safety, dignity and well-being of all children. Our Jesuit approach is rooted in the values of the Society of Jesus, which emphasises *Cura Personalis* (care for the whole person). We are committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school, preventative approach to managing safeguarding concerns, ensuring that the well-being of pupils is at the forefront of all action taken. Staff are aware that safeguarding and promoting the welfare of children is everyone's responsibility throughout the school and the boarding facilities. This policy sets out a clear and consistent framework for delivering this commitment, in line with safeguarding legislation and statutory guidance. It will be achieved by:

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

<https://panlancashirescp.trixonline.co.uk/>

1.2 The Cross-Campus DSL is Mrs Emma Winstanley. In the absence of the DSL, child protection matters will be dealt with by the Deputy DSL Dr Ruth Crossley, or an Assistant DSL.

2. Definitions

2.1 The terms “**children**” and “**child**” refer to anyone under the age of 18. The application of school policy relates applies to all pupils on roll.

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

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

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

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

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

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

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.

- Sexual exploitation, coercion, and threats.

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

2.7 For the purposes of this policy, the **“consensual and non-consensual sharing of nude and semi-nude images and/or videos”**, colloquially known as **“sexting”**, and collectively called **“youth-produced sexual imagery”** the sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline. This definition does not cover persons under the age of 18 sharing adult pornography or exchanging messages that do not contain sexual images.

2.8 **“Deep fakes”** and **“deep nudes”** refer to digitally manipulated and AI-generated nudes and semi-nudes.

2.9 For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

2.10 Indecent images also include indecent **“pseudo-images”**, which are images have been created or manipulated using computer software and/or AI.

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

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

2.13 For the purposes of this policy, **“emotional abuse”** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may

involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying,

causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

2.14 For the purposes of this policy, **“sexual abuse”** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse can be perpetrated by people of any gender and age. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and the school’s policy and procedures for dealing with it.

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

3. Legal Framework

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

Legislation:

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Skills, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers’ Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019

- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2023) 'Working Together to Safeguard Children 2023'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2025) 'Keeping children safe in education 2025'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- DfE (2024) 'Working together to improve school attendance'
- DfE (2025) 'Arranging Alternative Provision'
- DfE (2023) 'Arranging education for children who cannot attend school because of health needs'

Non-Statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2025) 'Recruit teachers from overseas'
- DfE (2025) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'
- DfE (2024) School and College Security

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

- Stonyhurst Behaviour and Relationships Policy
- Staff Code of Conduct (inc. Safer Working Practices)
- Safer Recruitment Policy (HR)
- Missing Pupil Policy
- Designated Safeguard Lead: Job Description
- Special Educational Needs and Disability Policy
- Accessibility Policy
- Anti-Bullying Policy
- Online/E-Safety Policy

- Lone Working Policy
- PSHE Policy
- Whistleblowing Policy
- The Use of Reasonable Force (within Behaviour and Relationships policy)
- Recruitment and Selection Policy
- The Acceptable Use Policy

The above policies are also accessible via the Stonyhurst website and Teams Channel.

4. Roles and Responsibilities

4.1 **All staff** have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil with a **child-centred approach**.
- Contribute to, and maintain a **high safeguarding ethos** within the setting, with safeguarding pupils at the forefront of practice, at all times .
- Ensure ALL children have opportunities to communicate and know that they are **listened to and understood**.
- Contribute to **providing a curriculum** which will equip all children with the skills to keep themselves safe and develop an attitude which will enable them to enter adulthood successfully and reach their full potential.
- Establish effective, supportive, and **positive relationships** with parents, carers, pupils and other professionals.
- Maintain an attitude of **'it could happen here'** where safeguarding is concerned.
- Be proactive to provide a **safe and secure environment** in which pupils can learn.
- Be prepared to **identify** pupils or families who may benefit from **early help**.
- Be aware of the **school's individual procedures** that support safeguarding, including all policies, internal reporting procedures, information and engage with training provided.
- Be aware of the role and **identity of the DSL** and deputy DSLs and seek them for advice if required.
- Undertake **safeguarding training**, including online safety training (which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities **in relation to filtering and monitoring**), during induction and subsequently on a regular basis (at least annually), including receiving bulletins, emails and briefings. Staff should undertake **Prevent awareness training** at least every two years.
- Be aware of the **local early help process** and understand their role in it.
- Be aware of, and understand, the process for making referrals to Children's Social Care, understanding that **anyone can make a referral**.
- Understand how to make a referral to CSC and/or the police immediately, if at any point there staff have identified **that a child has been harmed, there is a risk of immediate serious harm to a child** or if the situation is an emergency.
- Be aware of and **understand the procedure to follow** in the event that a child confides they are being abused, exploited or neglected, in a timely manner.

- Maintain appropriate **levels of confidentiality** when dealing with individual cases.
- **Reassure victims** that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Be aware of **safeguarding issues** that can put pupils at risk of harm.
- **Be aware of behaviours linked to issues** such as drug-taking, alcohol misuse, unexplainable and / or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that pupils are at risk.
- Be fully aware of the importance of **mental health in relation to safeguarding** and that all staff should also be aware 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.
- Be aware that **a pupil may not feel ready** or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Understand the process for reporting concerns about other adults as set out in section 24 of this policy and the School's Low-Level Safeguarding Concerns Policy.

4.2 Teachers, including the Head, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the '**Teachers' Standards**'
- Report, by law, any disclosures of FGM to the police.

4.3 The governing body has a duty to:

- Take **strategic leadership responsibility** for the school's safeguarding arrangements.
- Ensure that the school **complies with its duties** under the above child protection and safeguarding legislation.
- Ensure that all governors receive **appropriate safeguarding and child protection training** upon their induction and that this training is updated regularly.
- Ensure that staff **read, understand and follow** part one and Annex B of KCSIE September 2025.
- Ensure a **named Governor takes leadership responsibility (Helen McCormick)** for safeguarding arrangements and receives appropriate training in the management of safeguarding.
- Attend **Prevent training** at least every two years.
- Appoint an appropriate member of staff from the SLT to the **role of DSL** and one or more deputy DSL(s) to provide support and ensure that they are trained to the same standard as the DSL ensuring that the roles are explicit in their job description(s). Ensure the provision of appropriate support, funding, training, resources, and time to carry out their role effectively.
- Support and monitor a **whole-school approach to safeguarding**; this includes ensuring that safeguarding and child protection are at the forefront and **ethos** remains consistently high.
- Ensure **systems are in place so that children to confidently report abuse**, knowing that their concerns will be treated seriously, and they can safely express their views and

give feedback; these systems will be well-promoted, easily understood, and easily accessible. Ensure that the **voice of the child** is heard and acted upon.

- Ensure **effective and appropriate policies** and procedures are in place.
- Make sure that **pupils are taught about safeguarding**, that safeguarding is embedded with the curriculum, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting **pre-employment checks on staff** who work with children.
- Ensure the school has **clear systems and processes in place for identifying possible mental health problems in pupils**, including clear routes to escalate concerns and clear referral and accountability systems.
- Ensure that at least one person on any recruitment panel has undertaken **safer recruitment training**.
- Ensure that **all undergo safeguarding and child protection training** (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. The training will be regularly updated (at least annually). Staff will receive regular safeguarding and child protection updates, including online safety (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard pupils effectively.
- Confirm that there are transparent procedures in place to handle **allegations against staff**, supply staff, volunteers and contractors, including when the school premises are let out to a third party.
- Confirm that there are **procedures in place to make a referral to the DBS** if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Confirm that there are **procedures in place to consider whether to make a referral to the TRA**, where the school dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first.
- Ensure that appropriate disciplinary procedures are in place, as well as **policies pertaining to the behaviour of pupils and staff**.
- Ensure that **procedures are in place to eliminate unlawful discrimination, harassment and victimisation**, including those in relation to child-on-child abuse.
- **Appoint a designated teacher to promote the educational achievement of CLA and ensure that this person has undergone appropriate training.**
- Ensure that the **appropriate level of check** is completed on Governors.
- Create a culture where **staff are confident to challenge** senior leaders over any safeguarding concerns.
- Understand that online safeguarding is an interrelated and running theme through safeguarding practice. Ensure that **children are safe online** by ensuring that

appropriate filtering and monitoring systems are in place and regularly review their effectiveness, understanding those children that are potentially at greater risk of harm.

- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation and prevent the risk of escalation in the future.
- Ensure staff in school are aware of, and policies are personalised to reflect, an understanding of specific issues such as **child-on-child abuse** and safeguarding children with disabilities and special educational needs.
- Partake and complete the **SI75/I75 audit tool** on a two yearly cycle (at least) as directed by the Local Authority.
- Be aware of their obligations under the **Human Rights Act 1998**, the Equality Act 2010, and the local multi-agency safeguarding arrangements.
- Ensure that all practice and procedures operate with the best interests of the child at the centre with a **firm child centred approach**.

4.4 The DSL has a duty to:

- The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place, ensuring their effectiveness) whilst creating a culture of safeguarding throughout the setting, continually raising the profile.
- Provide **advice, support and expertise to other staff** on child welfare, safeguarding and child protection matters.
- **Take part in strategy discussions**, inter-agency meetings and Child Protection Conferences and/or support other staff to do so.
- **Contribute to the** assessment of children, and/or support other staff to do so.
- Ensure that all staff receive appropriate safeguarding training at induction, including online safety and expectations and responsibilities relating to filtering and monitoring. This updated regularly, at least annually.
- **Be available** during school hours for staff to discuss any safeguarding concerns.
- Arrange, alongside the school, adequate and **appropriate cover** for any activities outside of school hours or terms.
- Have due regard to the [PACE Code C 2023](#) in regards to the role of an appropriate adult.
- Refer cases:
 - To CSC where abuse and neglect are suspected, and support staff who make referrals CSC.
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - To the DBS where if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
 - To the police where a crime may have been committed, in line with the National

Police Chiefs' Council (NPCC) guidance.

- Act as a **point of contact** with the multi-agency partners.
- Ensure **effective communication** and information sharing (when appropriate) between Deputy DSLs, Pastoral Team, SLT, Executive, Governors and Heads.
- Liaise with staff when deciding whether to make a referral by **liaising with relevant agencies** so that children's needs are considered holistically.
- Liaise with the **senior mental health lead** and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.

- Promote **supportive engagement with parents** in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with relevant staff, **taking lead responsibility for promoting educational outcomes** for children, by understanding the lasting impact that adversity and trauma can have on children's behaviour, mental health and wellbeing, knowing the safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
 - Ensuring that the school knows which pupils have or had a social worker.
 - Understanding the academic progress and attainment of these pupils.
 - Maintaining a culture of high aspirations for these pupils.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
- Ensure that **child protection files are kept updated** and securely, monitoring the quality and accuracy of logs.
- Ensure that a pupil's child protection **file is transferred** as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared to support a child's journey.
- Ensure **all stakeholders understand the Child Protection Policy**, Keeping Children Safe in Education 2025, statutory guidance and internal procedures to report any concerns are transparent and understood by all. Ensure this information is given in **induction** and at regular intervals / training.
- Work with the governing board to ensure the school's Child Protection and **Safeguarding Policy is reviewed annually**, and the procedures are updated and reviewed regularly.
- Undergo **DSL initial training** and update this training with refresher training at least every two years to remain compliant.
- Ensure opportunities for **further training** and opportunities for upskilling are taken.
- Have due regard to the role of an appropriate adult for enquiries under section 47 of the Children Act 1989 and police investigations.
- Encourage a culture of listening to children promoting **the voice of the child**.
- **Recognise the importance of information sharing**, including within school, with other schools and with the safeguarding partners and other agencies by understanding relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.

- Undertake **Prevent** awareness training (at least) every two years.
- Notify the governors if they do not feel they appropriate support and **supervision** in order to carry out the role safely and effectively.
- Liaise with the Local Authority Personal Advisors for any Care Leavers.
- Have due regard to Appendix C of Keeping Children Safe in Education 2025 – 'The Role of the Designated Safeguarding Lead'.

Stonyhurst recognises that Assistant DSLs must be trained to same standard as the DSL.

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

The DSL can be contacted via email at: dsl@stonyhurst.ac.uk or via the school's Reception/Security: (01254) 826345.

5. Multi-Agency Working

5.1.1 The following three **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017):

- The local authority (LA);
- The integrated care board;
- The chief officer of police for a police area in the LA area.

5.1.2 They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs.

5.1.3 Stonyhurst works closely with safeguarding partners to support children, young people and their families. We acknowledge that safeguarding partners may offer the school and its community advice, support and guidance. In order to safeguard our young people, Stonyhurst staff may request further support or advice from these partners. Where deemed appropriate the school will consult and inform the young person and/or their family when engaging with partners.

5.1.4 Stonyhurst, if named as a relevant agency, are under a statutory duty to co-operate with the published safeguarding partner arrangements and will act in accordance with the relevant safeguarding arrangements, as necessary. Stonyhurst will follow the procedures set out by our local safeguarding partnership, Lancashire Children's Safeguarding Partnership (CSAP) <https://lancshiresafeguardingpartnership.org.uk/safeguarding-children> and <https://panlancshirescp.trixonline.co.uk/>

5.1.5 Please see further details of our immediate Safeguarding partners: [Local Authority: Lancashire](#)
[Lancashire Police](#)
[Lancashire and South Cumbria Integrated Care Board](#)

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

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

5.1.7 The school will develop trusting relationships between families and agencies to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

5.1.8 Where a need for early help is identified, the school will allow access for CSC from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

5.1.9 The school will also be mindful of the importance of inter-agency working in identifying and preventing CSE.

The school will reflect the DfE's expectations to secure strong multi-agency working by:

- **Collaborate:** practitioners working with the same child and family share information to get a complete picture of what life is like for the child. Collectively, they ensure the child's voice is at the centre and the right support is provided
- **Learn:** practitioners learn together by drawing on the best available evidence from their individual fields and sharing their diverse perspectives during regular shared reflection on a child's development, experiences, and outcomes
- **Resource:** practitioners build strong relationships across agencies and disciplines to ensure they support and protect the children with whom they work
- **Include:** practitioners recognise the differences between, and are confident to respond to, circumstances where children experience adversity due to economic and social circumstances and acute family stress, and situations where children face harm due to parental abuse and neglect
- **Mutual challenge:** practitioners challenge themselves and each other, question each other's assumptions, and seek to resolve differences of opinion in a restorative and respectful way

5.2 Information sharing

5.2.1 The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.

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

5.2.4 Staff members will be made aware that safeguarding partners may take legal action against them if they do not share specified information when a request is made for the purposes of safeguarding.

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

6. Early Help

6.1 Early help means providing support as soon as a problem emerges, at any point in a child's life. The school will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.

6.2 Any pupil may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Are suffering from mental ill health.
- Are young carers.
- Are bereaved.
- Show signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime.
- Frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised.
- Are viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online.
- Is misusing drugs or alcohol.
- Have family members in custody or is affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are displaying harmful sexual behaviours which may pose a risk to other children and themselves.
- Are missing education, or persistently absent from school, including persistent absences for part of the school day.
- Show any other early signs of abuse, neglect any other identified reason not listed above that requires extra support or intervention to improve outcomes for families and children.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school.

6.3 The school will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from early help.

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

6.5 The DSL or DDSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

[Early Help Assessment - information for professionals - Lancashire County Council.](#)

6.6 Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSC for assessment for statutory services if the pupil's situation is not improving or is worsening.

6.7 We therefore ensure that:

- All staff and volunteers can identify the risk factors that indicate a family or pupil may benefit from Early Help and can follow school procedures to share this with the DSL.
- The DSL will undertake a Family Early Help Assessment, when appropriate, to identify what Early Help is required.
- DSLs will signpost and refer to appropriate support agencies.
- DSLs will lead on TAF meetings where it is appropriate for them to do so .
- DSLs will follow the local safeguarding processes

7. Abuse, Neglect and Exploitation

7.1 All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection

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

7.3 All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation. All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

7.4 All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content

- 7.5 All staff understand that children who perpetrate abuse or display harmful behaviour have often experienced their own abuse and trauma and it is important they are offered appropriate support as well as the alleged victim of the harmful sexual behaviour. Risk Assessments will be undertaken where a child's behaviour poses a risk to others, themselves or the environment.
- 7.6 All staff and volunteers understand that there are specific and emerging ways in which children can be abused and are aware of these specific issues, reporting any concerns, in the appropriate manner to the DSL.
- 7.7 In all cases, if staff are unsure, they should always speak to the DSL or DDSL.
- 7.8 Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful.
- 7.9 The Lucy Faithfull Foundation in collaboration with the Home Office, has developed '[Shore Space](#)', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

8 Specific Safeguarding Issues

- 8.1 There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.
- 8.2 Appendix 7 of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

9 Child-on-Child Abuse

- 9.1 For the purposes of this policy, "**child-on-child abuse**" is defined as abuse between children.
- 9.2 The school has a **zero-tolerance approach to abuse**, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.
- 9.3 Stonyhurst will refer to the specific guidance in Keeping Children Safe in Education Part five: Child on Child Sexual Violence and Sexual Harassment and relevant local authority procedures.
- 9.4 All staff will be aware that child-on-child abuse (including sexual violence and sexual harassment) can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring, it may be the case that it is just not being reported. All staff will speak to the DSL if they have any concerns about child-on-child abuse.
- 9.5 All staff will understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. 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.

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

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between children – sometimes known as ‘teenage relationship abuse’.
- Physical abuse – such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. This may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – such as rape, assault by penetration and sexual assault. This may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment - such as sexual comments, remarks, jokes and including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

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

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

9.9 All staff will be made aware of the heightened vulnerability of pupils with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil’s SEND and will always explore indicators further.

9.10 All staff will be made aware of the heightened vulnerability of LGBTQ+ pupils, who evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. The school’s response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

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

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

9.13 Stonyhurst and the DSL will consider:

- the wishes of the victim in terms of how they want to proceed.
- the nature of the alleged incident.
- the ages of the children involved.
- the development stages of the children involved.
- any power imbalance between the children.
- is the incident a one-off or a sustained pattern of abuse.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- importance of understanding intra familial harms and any necessary support for siblings following incidents.
- are there ongoing risks to the victim, other children, school or college staff.
- contextual safeguarding issues.

9.14 Following a report of sexual violence, the designated safeguarding lead (or deputy) will make an immediate risk and needs assessment. Risk assessments (if required) will be recorded and kept under review as a minimum termly and refer to Guidance in Keeping Children Safe in Education Sept 2025, Part 5. considering:

- the victim.
- the alleged perpetrator.
- all other children (and if appropriate adult students and staff).
- The time and location of the incident, and any action required to make the location safer.

9.15 The boarding environment provides an additional context that needs careful consideration. The College's Pupil Code of Conduct, make clear that sexual relations between pupils whilst at College or a College organised event are forbidden and pupils are not allowed to enter the bedroom of a pupil in a Boarding House without permission to do so from the House Parent. The Pupil Code of Conduct is always explained to pupils at the beginning of the school year. Inevitably, there are risks associated with children sharing overnight accommodation and it is for this reason that boarding areas have restricted access. Ultimately, all pupils are encouraged and enabled to make and sustain respectful friendships within and outside the boarding community.

10 Serious Violence

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

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

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

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

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

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

11 Online Safety and Personal Electronic Devices

11.1.1 The school will adhere to the Online Safety Policy at all times and is committed to keeping children safe online. The school recognises that addressing online safety issues should form an integral part of the school's safeguarding arrangements.

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

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

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

11.1.4 The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the school's Cyber-security Policy. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the filtering and monitoring standards published by the DfE.

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

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

11.1.7 When school become aware of an online safety issue that has occurred outside of school, it is managed in accordance with the Online Safety Policy and School Behaviour Policy.

11.1.8 Staff will be aware that ongoing in-person monitoring is required in addition to the software in place as it is vital staff don't rely solely on IT systems as this may leave some children vulnerable.

11.1.9 The School's approach to harmful online content and how boarders' devices are managed in terms of bringing a device into the school, and harmful content that may already be downloaded on to it, and the opportunity to download harmful content via mobile data that will bypass the school's filtering and monitoring systems can be found in the School's Online Safety, Behaviour Management and Acceptable Use policies.

11.2 **Communicating with parents**

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

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

11.3 **Reviewing online safety**

11.3.1 The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

11.4 **Personal electronic devices**

11.4.1 The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Staff Code of Conduct and Acceptable Use Policy.

11.4.2 Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Taking, Storing and Using Images of Children Policy. The Data Protection Lead will oversee the planning of any events where photographs and videos will be taken.

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

11.4.4 Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures. Stonyhurst is committed to keeping pupils safe by ensuring that electronic devices such as cameras, phones and tablets are used in an appropriate manner.

11.4.5 School will therefore ensure that:

- informed parental consent is obtained to take and use photographs and/or videos of children, for use in school, to market the school or to share on social media / internet.
- staff, visitors, volunteers and students do not use their own mobile phones or devices to take or record any images of children.

11.5 **Upskirting**

11.5.1 Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the

purpose of upskirting. **“Operating equipment”** includes enabling, or securing, activation by another person without that person’s knowledge, e.g. a motion-activated camera.

11.5.2 Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

12. Consensual and Non-Consensual Sharing of Indecent (Nude & Semi-Nude) Images and Videos

12.1 Formerly referred to as ‘Sexting’, sharing nudes and semi-nudes is defined as *the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline.* (UKCIS, 2024).

12.2 UKCIS – Sharing nudes and semi-nudes: advice for education settings (UKCIS, 2024).

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>.

12.3 The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (formerly known as “sexting” or youth-produced sexual images) as a safeguarding concern.

12.4 Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

12.5 Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

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

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

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

12.8 The DSL will attempt to understand what the image contains **without viewing it** and the

context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. This might include where there is an adult involved, where there is an intent to harm the pupil or where the images are used recklessly.
- **Experimental:** incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse.

12.9 Where it is necessary to view the imagery because of a good clear reason (e.g. if this is the only way to make a decision about whether to inform other agencies; is necessary to report it to a website, app or suitable reporting agency (such as the IVF) to have it taken down, or to support the child or young person or parent or carer in making a report; or is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network), the DSL should:

- never copy, print, share, store or save them; this is illegal. If this has already happened, contact the local police for advice and to explain the circumstances.
- discuss the decision with the Head or a member of the senior leadership team.
- make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the Head or a member of the senior leadership team.
- make sure viewing takes place with another member of staff present in the room, ideally the Head or a member of the senior leadership team.
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the Head or a member of the senior leadership team's office.
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images.
- record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. This should be signed and dated.
- if any devices need to be taken and passed onto the police, the device(s) should be confiscated and the police should be called. The device should be disconnected from Wi-Fi and data, and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device should be placed in a secure place, for example in a locked cupboard or safe until the police are able to come and collect it.

12.10 The above summarised points are explained in further detail with important supporting guidance in the UKCIS guidance – Sharing nudes and semi-nudes: advice for education settings.

12.11 The school's full response to incidents of consensual and non-consensual sharing of indecent images and videos can be found in the Youth-produced Sexual Imagery Policy, including the

appropriate reporting routes for both staff and pupils.

13. Context of Safeguarding Incidents

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

14. Pupils Potentially at Greater Risk of Harm

14.1.1 The school recognises that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

14.2 Pupils who need social workers

14.2.1 Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

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

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

14.3 Pupils who are absent from education

14.3.1 Pupils 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. 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.

14.3.2 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.

14.4 Home-educated children

14.4.1 Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are not in receipt of suitable education and are less visible to the services needed to safeguard and support them.

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

14.4.3 Where a parent has expressed their intention to remove a pupil from school for EHE, the

school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker, and/or is otherwise vulnerable.

14.4.4 Where children are removed from roll for EHE and there are safeguarding concerns, school will ensure that concerns are shared with the LA.

14.5 CLA and PLAC

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

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

14.5.3 Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.

14.5.4 Contact arrangements with parents or those with parental responsibility.

14.5.5 Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

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

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

14.6 Pupils with SEND

14.6.1 When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

14.6.2 Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability

14.6.3 Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs

14.6.4 Communication barriers may exist, as well as difficulties in overcoming these barriers

14.6.5 Pupils with SEND may be unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school.

14.6.6 When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

14.7 LGBTQ+ pupils

14.7.1 The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

14.7.2 Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

14.8 Pupils requiring mental health support

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

14.8.2 Where staff have concerns about a pupil's mental health, they should follow the process outlined in the Physical, Mental and Emotional Well-Being Policy (Pupils) and other linked medical and mental health policies.

14.9 Adverse Childhood Experiences and Trauma

14.9.1 We acknowledge that children who have experienced adverse childhood experiences and trauma may be at increased risk of developing health and social difficulties.

14.9.2 All staff will be made aware of the long-lasting impact of experiencing adversity and the lasting effect trauma can have on a child's development.

14.9.3 Where a pupil is known to have experienced trauma, appropriate arrangements will be made to provide support based on the needs of the pupil and in line with all relevant guidance and policies. This may include close multi-agency working with external services.

15. Extremism and Radicalisation

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

Radicalisation is the process of a person legitimizing support for, or use of, terrorist violence.

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

15.1.3 Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may

need help or protection. Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate to ensure awareness of local and national incidents that may heighten the activity of extreme groups or cause increased curiosity of children.

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

15.1.5 The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation and ensure that all staff and governors have received appropriate and up-to date.

15.1.6 The Online Safety Policy will support the safeguarding of children online by ensuring they cannot access terrorist and extremist material when using the internet and that suitable filtering and monitoring software and supervision is in place.

15.1.7 The DSL and DDSLs understand when it is appropriate to make a referral to the Channel Panel and are aware of how to do so. 'Notice. Check. Share.'

15.1.8 Stonyhurst has an up to date risk assessment.

15.2 The Prevent duty

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

15.2.2 Stonyhurst will ensure that ALL Staff, Governors and volunteers are informed and have 'due regard to the need to prevent people from being drawn into terrorism', known as the 'Prevent Duty' and follow guidance from www.lancashirepreventpartnership.org.uk.

15.2.3 Prevent referral process -

We will follow the statutory Prevent referral process.

Prevent Lead	Emma Winstanley
Prevent Governor Lead	Helen McCormick
Prevent Curriculum Lead	Emily Ashe

16. Use of School Premises for Non-School Activities

16.1.1 Where the governing board hires or rents out school facilities or the school premises to

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

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

16.2 Extracurricular activities and clubs

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

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

16.2.3 Stonyhurst will always consider safeguarding arrangements when an extracurricular activity or club is arranged in view of DSL availability or ensuring that a transfer of control document has been completed for external agencies and the school is satisfied that the agency has appropriate safeguarding policies and procedures in place.

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

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

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

17. Alternative Provision

17.1 The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff. This will include written confirmation that the alternative provider will inform the school of any arrangements that may put a pupil at risk, so the school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

17.2 The school will always know where a pupil is based during school hours. The school will have records of the address of the alternative provider and any subcontracted provision or satellite sites a pupil may attend. The school will regularly review the alternative provision placements, at least every half-termly to provide assurance that the pupil is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

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

18. Work Experience

18.1 When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

19. Guardians

19.1 Staff at Stonyhurst do not act as educational guardians for boarders under any circumstance (NMS 2022). Where appropriate, boarding pupils should have a named guardian.

19.2 Stonyhurst also takes appropriate measures to ensure that children are safe and that the guardianship arrangement is promoting the physical and emotional wellbeing of our pupil(s). Steps taken by the school may include welfare calls from House Parents, Safeguarding Team and/or checks from our safeguarding partners.

19.3 Any concerns about guardianship arrangements will be referred to the relevant agency by the DSL, and where the guardianship arrangement may constitute private fostering, this will also be referred to the relevant local authority.

19.4 Parents and guardians should aim to notify the school of any travel arrangements and confirm within two weeks of pupils leaving school for holiday who they are staying with for the duration of their holiday if not with parents e.g. guardian. A Playroom Leader, Deputy Head Pastoral or DSL may contact parents/guardians if there are any concerns.

20 Homestay Exchange Visits

20.1 School-arranged homestays in UK

20.1.1 Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

20.1.2 Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

20.2 School-arranged homestays abroad

20.2.1 The school will liaise with partner schools to discuss and agree the arrangements in place for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

20.3 Privately arranged homestays

20.3.1 Where a parent or pupil arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

20.4 Private fostering

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

21 Concerns about Pupils

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

21.2 Staff will be aware that pupils 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. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL or deputy DSL, if they have a concern about a pupil.

21.3 All staff members are aware of the procedure for reporting concerns and understand their

responsibilities in relation to confidentiality and information sharing, as outlined in the Communication and confidentiality section of this policy.

21.4 Where the DSL is not available to discuss the concern, staff members will contact the deputy DSLs. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.

21.5 The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

21.6 If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely on the child's individual file on CPOMS.

21.7 If a pupil is in immediate danger, a referral will be made to CSC and/or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

21.8 Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

21.9 An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

21.10 The school will consider whether a family group decision-making forum is appropriate to determine the help and support the family network can provide for a pupil where concerns have been raised about their safety or wellbeing.

22 Managing Referrals

22.1 The reporting and referral process outlined in the Reporting Safeguarding Concerns Flowchart will be followed accordingly.

22.2 All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSC or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

22.3 The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

22.4 Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be

notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

22.5 The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSC. Where CSC decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSC decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

22.6 At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

22.7 If the school are dissatisfied, local escalation procedures will be followed. [Conflict Resolution Policy](#)

23 Concerns about School Safeguarding Practices

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

24 Safeguarding Concerns and Allegations of Abuse against Staff

24.1. There are clear policies in line with those from the CSAP (Children's Safeguarding Assurance Partnership) for dealing with allegations against people who work with children.

24.1.2 If a staff member has concerns about another member of staff (including supply staff, volunteers and persons who use/hire the school premises), it will be raised with the Head or DSL without delay. If the concern is with regards to the Head, it must be referred to the chair of governors.

24.1.3 All allegations against staff, supply staff, volunteers and contractors will be managed in line with KCSIE, this policy, the Low-Level Safeguarding Concerns policy and the school's staff disciplinary policy (as appropriate). The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

24.1.4 When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns". Allegations that meet the harms threshold include instances where staff have:

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

24.1.5 All staff at Stonyhurst are aware of these procedures and aware of the following expectations and protocol:

- ALL staff and volunteers are aware that they must refer allegations or concerns around staff (including supply staff) conduct to the Head or DSL without delay.
- ALL staff and volunteers are aware of the requirement to, and process of referring allegations or concerns around the Head to the Chair of Governors and how to contact them.
- The Head, DSL or Chair of Governors will discuss the allegation with the Local Authority Designated Officer (LADO).
- CSAP procedures for dealing with allegations against staff will be followed <https://panlancashirescp.trixonline.co.uk/chapter/allegations-against-staff-or-volunteers>.
- ALL staff and volunteers remember that the welfare of the child is paramount and that they have a duty to inform the Head or DSL if any adult's conduct gives cause for concern.
- All staff recognise the importance of sharing and reporting low-level concerns (see below guidance on low-level concerns) Head about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors).
- ALL staff are aware of the school's Whistle Blowing Policy which enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.
- Staff are fully aware of Guidance for Safer Working Practice 2022 and the Staff Code of Conduct and are aware of professional expectations of their own behaviour and conduct.
- Further information, LADO referral information and flowchart of how allegations are managed: https://my.apps.lancashire.gov.uk/w/webpage/request?form=management_of_allegations_notification.



Threshold matrix
LADO August 2022 (

24.1.6 Stonyhurst recognises that children may make disclosures against someone who is in a position of trust / is working or volunteering with children, not in the school setting. This may be an adult in a place of worship, a sports coach or a club leader. After ensuring that the child is safe, we recognise that we must refer to the LADO and share information.

24.2 Low Level Concerns

24.2.1 Stonyhurst ensures that all staff are aware of how to recognise and report **low level concerns** around staff behaviour or conduct.

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

24.2.3 The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any

concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

24.2.5 Stonyhurst will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers, contractors or those that have hired/let the premises) are dealt with promptly and appropriately. Stonyhurst will strive to embed a culture of openness, trust and transparency in which the school’s values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

24.2.6 Stonyhurst will ensure that staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

24.2.7 All staff are clear on how to report low level concerns and will be empowered to do so. Staff must report their concerns to the Head or DSL (*the Head will always be kept informed of a low-level allegations in a timely manner.*) If concerns are surrounding the Head, this must be referred to the Chair of Governors. Guidance from Keeping Children Safe in Education, September 2025, will be followed in view of recording and storage of such concerns.

24.2.8 If in doubt whether the concern is a low-level concern, the Head or DSL will consult with LADO for guidance.

24.2.9 The governing body will ensure low-level concern procedures and staff behaviour expectations are clearly addressed within the Staff Code of Conduct, and procedures are implemented effectively, ensuring that appropriate action is taken in a timely manner to safeguard children and facilitate a whole school or college approach to dealing with any concerns.

25 Communication and Confidentiality

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

- Understand the importance of information sharing, both within the school and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.

- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

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

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

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

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

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

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

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

26 Safer Recruitment

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

26.1.1 Stonyhurst is committed to keeping pupils safe by ensuring that adults who work or volunteer in school are safe to do so. We therefore ensure that:

- Keeping Children Safe in Education, September 2025, Part 3 guidance is adhered to, to ensure that there is a strong reference and commitment to safeguarding during advertisement, selection and recruitment of new staff.

26.1.2 An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.
- (*Regular is defined as; at least 3 times in a 30 day period.*)

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

26.1.4 The governing body will ensure that the appropriate pre-employment checks are conducted for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

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

26.1.6 School will ensure that:

- The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors. The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.
- The original DBS certificate is seen for all appointees to the school, even where the on-line DBS system indicates that the check is clear.
- There are sufficient staff/Governors who have undertaken appropriate Safer Recruitment training in the last 5 years and reached the required standard as verified by the course facilitators, to enable at least one person on every recruitment panel to be appropriately trained and there are at least 2 people on each selection panel.
- Written assurances will be obtained from agencies and other employers that provide staff to work in school, to confirm that appropriate pre-employment checks have been undertaken in line with Keeping Children Safe in Education, September 2025.
- Individual identity checks will be undertaken on those staff detailed above to ensure they are employees of the named agency/employer.
- Conduct an online search as part of our due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online and will inform shortlisted candidates of this procedure.
- Adults who are involved in the management or provision of child care of children in Early Years, or in out of school provision for children up to 8 years old, will make a declaration that they are not disqualified under the Childcare Act 2006.
- When an issue is declared, advice will be sought from Ofsted about the need to apply for a

waiver. If a waiver is necessary, a risk assessment will be carried out and proportionate measures put in place until a waiver has been issued or matters resolved. If it is not resolved, this must be reported: disqualification@ofsted.gov.uk.

- Advice will be sought from Human Resources, LADO and/or Schools Safeguarding Officers if any staff are unclear about any aspects of Safer Recruitment.

26.2 **Staff suitability**

26.2.1 All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

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

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

26.3 **Ongoing suitability**

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

26.4 **Referral to the DBS**

26.4.1 There is a legal requirement for schools and colleges to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

- engaged in relevant conduct in relation to children and/or adults, and/or
- satisfied the harm test in relation to children and/or vulnerable adults, and/or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

26.4.2 The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

27 **Single Central Record (SCR)**

27.1 The school keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

27.2 All members of the governing body are also recorded on the SCR.

27.3 The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- Whether the employee's position involves relevant activity, i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18
- A section 128 check for those in management positions
- Any other information deemed relevant

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

27.5 If any checks have been conducted for volunteers or governors, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, (with / without a barred list check, depending on whether they are in regulated activity), the risk assessment will be recorded.

27.6 Written confirmation that supply agencies have completed all relevant checks will also be included.

27.7 The school is free to record any other information it deems relevant.

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

28 Visitors and Visiting Speakers

28.1 Stonyhurst is committed to keeping pupils safe by ensuring that visitors to school do not pose a risk to children at our school.

28.2 We therefore ensure that:

- All visitors will be required to verify their identity to the satisfaction of staff;
- If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification;
- All persons visiting boarding accommodation or staff accommodation are kept under sufficient staff supervision to prevent them gaining unsupervised access to the boarders or their accommodation.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID;

or

- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

28.4 Visitors sign in using InVentry and wear identification sticker to indicate they have done so;

28.5 Visitors receive a welcome brief which includes safeguarding protocol and are made aware of who to speak to if they are worried about a child during their visit;

28.6 Visitors sign out and remove/hand in their identification when they leave the school;

28.7 Further acknowledgement is given to the Regulated Activity in Relation to Children: Scope document issued by Department for Education (2012).

29 Training and Induction

29.1 Stonyhurst recognises the importance of ongoing staff training and development to keep staff aware of emerging issues and keeping the ethos of safeguarding high. Everybody has a role to play in safeguarding our children and we strive to ensure all staff are well informed and know what to do if they have any concerns. Staff members, governors and volunteers will undergo safeguarding and child protection training at induction, which will be updated on a regular basis and/or whenever there is a change in legislation.

29.2 The induction training will cover:

- The Child Protection and Safeguarding Policy
- The Child-On-Child Abuse procedures
- The Staff Code of Conduct
- Part one and Annex B of 'Keeping children safe in education' (KCSIE 2025)
- The Behaviour Policy
- The School Attendance Policy, including the safeguarding response to children who have unexplained absences or go missing from education
- Appropriate child protection and safeguarding training, including online safety training - which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSL(s).
- How to record concerns in your setting.
- *Records will be kept of all inductions*

29.3 Following induction, Stonyhurst recognises the need to ensure continual, effective training to staff and other stakeholders. We will ensure:

- ALL staff, Governors and volunteers will receive Safeguarding Training (at least) annually.
- The DSL/s will provide ALL staff, volunteers and governors with regular safeguarding updates.
- ALL staff, volunteers and governors will read and show an understanding of any updates that are provided.
- DSLs will attend DSL training every 2 years and update their knowledge, skills and

understanding of relevant safeguarding issues on a regular basis.

- The DSL, along with Governors and all staff will undertake Prevent awareness training (at least) every two years.
- That at least one person on any recruitment panel has undertaken safer recruitment training
- ALL staff, volunteers and governors will undertake any additional specialised training on matters such as Child Sexual Exploitation, Prevent, Child-on-Child abuse, Online Safety, FGM etc as is deemed necessary by the SLT and DSL and that is particularly relevant to the context and needs of the setting.
- Any staff member will discuss any specific training requirements or gaps in knowledge or understanding with the DSL.
- Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.
- Detailed records will be held of staff safeguarding training and ensure that no training becomes out of date.
- All EYFS staff are required to attend safeguarding training specifically designed for staff caring for 0-5 year olds which must cover all the areas set out in Annex C to the EYFS Statutory Framework: “Criteria for effective safeguarding training.”
Training is renewed every year as part of the annual safeguarding training and all staff are required to attend. EYFS staff are supported to put their training into practice via regular updates and reminders from the DSL and inset training sessions, as well as annual meetings with their line manager which will always include safeguarding as an agenda item.

29.4 Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

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

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

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

- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

30 Monitoring and Review

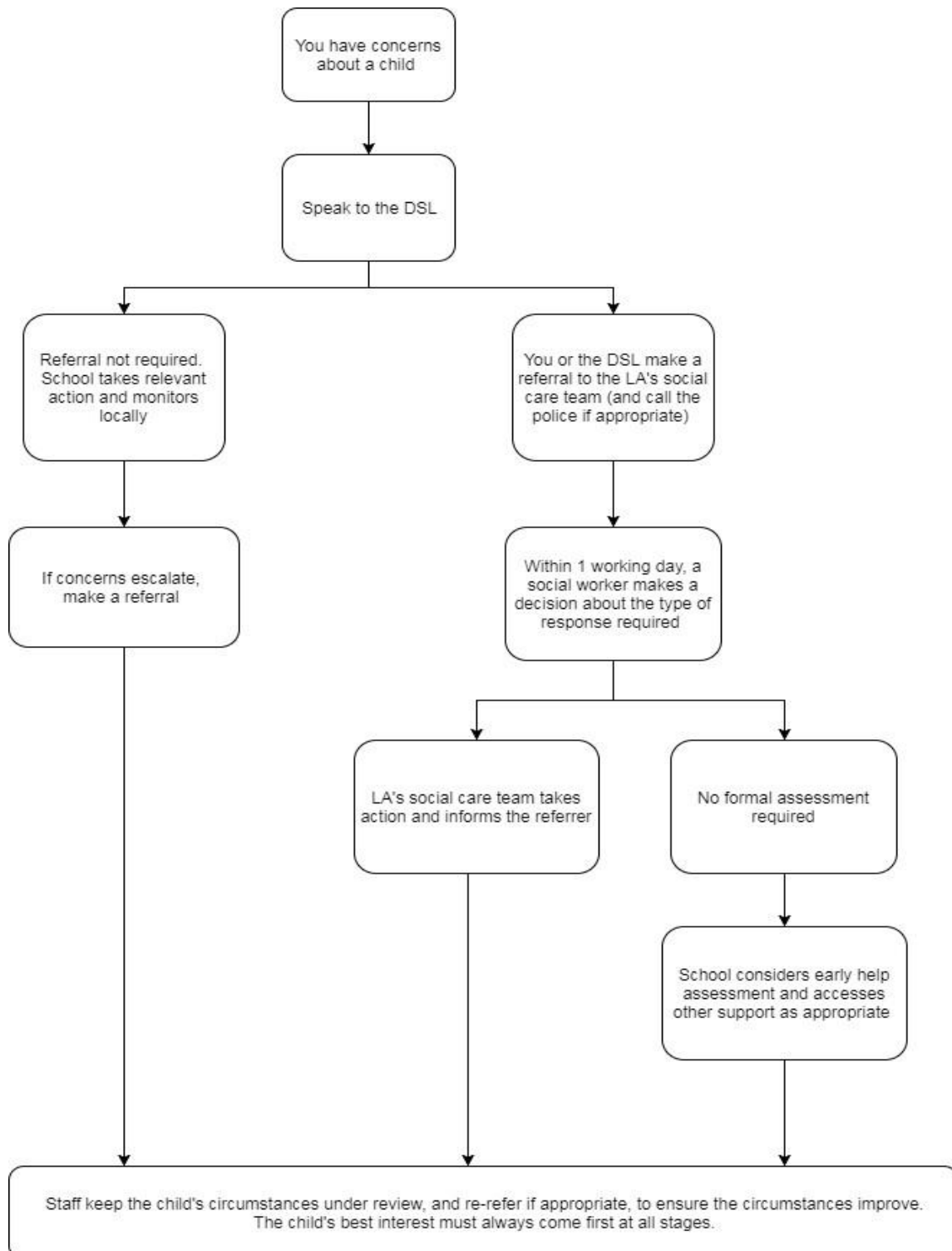
30.1 This policy is reviewed at least annually by the DSL and the Senior Deputy Head. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

30.2 Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is August 2026.

APPENDIX I:

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

Cross Campus DSL: Emma Winstanley (e.winstanley@stonyhurst.ac.uk) If the DSL is unavailable, contact a DDSL.



APPENDIX 2

APPENDIX 2

MISSING PUPIL POLICY: College and St. Mary's Hall (KS2-5)

In the unfortunate event a child may be missing, this policy and accompanying protocol outline the steps to take to take to locate them. There are two parts to this document: the first explains the policy, and the second is intended to be used as a 'quick guide' which will lead the user step by step through the correct procedure.

For the purposes of this policy a 'missing pupil' is broadly defined as a pupil who is not where (s)he should be at a particular time. There could be any number of reasons for this, ranging from the potentially extremely serious, to the mundane. It is for the Duty Member of the Senior Leadership Team or House Parent, based on their knowledge of the individual concerned, the time and day, and other relevant factors, to decide which of the following categories the absence falls into:

Category 1 – Urgent

The pupil is not where he or she is supposed to be; the whereabouts are unknown and there is cause for serious concern about the person's welfare. Example: there is a real or implied threat of suicide or self-harm, or factors are known which suggest that the pupil might be in significant danger. Example: a pupil is missing from the health centre having been feeling extremely unwell. Example: a younger pupil not being in a lesson after being registered (e.g. after a rec).

Category 2 - Less Urgent

The pupil is not where (s)he is supposed to be; the whereabouts are unknown, but there is no particular cause for concern about the person's welfare.

Example: a pupil is late back from an exeat. Example: a pupil who was registered present at 8.20 does not turn up to Period 1. The category chosen will determine subsequent procedure.

NB: any pupil considered vulnerable (either statutorily, e.g. LAC, etc. or any other pupil considered vulnerable in our setting) must automatically be considered urgent.

Procedure to be followed for: Category 1: URGENT

Urgent At the College

The House Parent (or another responsible adult) should attempt to make verbal contact with the pupil by mobile phone. Mobile phone numbers are kept by House Parents and Playroom Leaders, and are checked each term.

At the College, other pupils may be able to provide a satisfactory account of the missing person's whereabouts, enabling the absence to move to Category 2. A search of the most likely areas of the premises should be conducted. If these avenues fail to resolve the problem the Senior Deputy Head should be contacted immediately, and, after consultation, a decision taken as to whether the police should be called. At this stage, and subsequently at frequent and regular intervals throughout the incident, parents or guardians should be kept abreast of all developments. The decision as to when a Category 1 'Urgent' absence becomes a Critical Incident rests with the Headmaster or Senior Deputy Head.

At St. Mary's Hall (SMH): Other pupils may be able to provide a satisfactory account of the missing person's whereabouts, enabling the absence to move to category 2. The duty member of Senior Leadership will check the individual tuition timetables and the signing out register. If at this stage the pupil is still not found a search of the most likely areas of the premises should be conducted. If these avenues fail to resolve the problem the Headmaster should be contacted immediately, and, after consultation, a decision taken as to whether the police should be called. At this stage, and subsequently at frequent and regular intervals throughout the incident, parents or guardians should be kept abreast of all developments. The decision as to when a Category 1 'Urgent' absence becomes a Critical Incident rests with the Headmaster.

Procedure to be followed for Category 2 – Less Urgent

At the College, other pupils may be able to provide a satisfactory account of the missing person's whereabouts. The duty member of Senior Leadership (SLT), House Parent (or another responsible adult) should attempt to make verbal contact with the pupil by mobile phone, either by voice or text. Where mobile phones may not be accessible, contact may be via Teams call or Email. Mobile phone numbers are kept by House Parents and Playroom Leaders and are checked each term. If these avenues fail to resolve the problem it is appropriate, during the daytime, to wait until the next official roll call or registration, or for three hours (whichever is sooner). If at this stage the pupil is still unaccounted for, the absence should be re-categorised as 'Urgent' and the duty member of SLT should be informed.

At St. Mary's Hall (SMH) other pupils may be able to provide a satisfactory account of the missing person's whereabouts. The duty member of SLT will check the individual tuition timetables and the signing out register. If at this stage the pupil is still unaccounted for, the absence should be re-categorised as urgent, and the Headmaster should be informed.

Further Safeguarding Considerations: Missing Pupils

Staff should be aware of the categories of children who are more likely to go missing from school. Stonyhurst work closely with the LA and safeguarding partners to support pupils missing from education. In addition to the information contained in KCSIE (2025) relating to CME pupils, children identified at risk include those who are:

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

Stonyhurst will continue to make reasonable enquiries relating to pupils missing from school that:

- Haven't returned to school for 10 days after an authorised absence, or
- Have been absent without authorisation for 20 consecutive days.

Stonyhurst may take the following actions as part of their enquiries:

- Contacting parents, relatives and neighbours using known contact details
- Checking local databases within the LA
- Follow local information sharing arrangements
- Check with UK Visas and Immigration (UKVI) and/or the Border Force
- Check with the LA and school from which your pupil moved from originally, or any past LAs or schools that have educated your pupil
- Check with the LA where your pupil lives, if it's different from the one where your school is
- In the case of children of service personnel, checking with the Ministry of Defence [Children's Education Advisory Service](#)
- Conducting a home visit, following your own policies and risk assessment procedures. If appropriate, making enquiries with neighbours and relatives.
- Pupils may also be taken off-roll.

If we are unable to locate a pupil (or the Local Authority), they (pupil) may be removed from the school's roll. Parents will be notified of any action.

MISSING PUPIL POLICY FLOW-CHART

MISSING PUPIL PROTOCOL – FLOW CHART

Stonyhurst College

Stonyhurst College Missing Pupil Flow-Chart		
What category does the Missing Pupil fit into?		
Category 1: Urgent	Category 2: Less Urgent	
<p>Attempts made to contact the pupil that include: asking other pupils; phoning/emailing them.</p> <p>Ask Security to check systems.</p> <p>Searches made of obvious places.</p> <p>Contact the Duty SLT member.</p> <p>Phone parents or guardians.</p> <p>Notify the Headmaster.</p> <p>After discussion with Headmaster and/or Senior Deputy Head - call the police.</p>	Is it at night, after curfew?	
	Yes	No
	<p>Ask other pupils and attempt to contact via email/call. Search obvious places.</p> <p>Wait for an hour. Notify the Duty Member of SLT. They will notify the Headmaster or Senior Deputy Head.</p> <p>After discussion with Headmaster or Senior Deputy Head, if not found, contact the Police.</p>	<p>Ask other pupils and attempt to contact via email/call. Search obvious places.</p> <p>Wait for three hours or next registration, if sooner.</p> <p>Notify the Duty Member of SLT. They will notify the Headmaster or Senior Deputy Head.</p> <p>After discussion with Headmaster or Senior Deputy Head, if not found, contact the Police.</p>

Missing Pupil Protocol

Lower Prep to Upper Elements

St. Mary's Hall

Missing Pupil Flow-Chart Lower Prep to Upper Elements	
What category does the Missing Pupil fit into?	
Category 1: Urgent	Category 2: Less Urgent
<ul style="list-style-type: none">• Ask other pupils• Quick search of obvious places• Contact the Duty SLT• Contact the Headmaster• Phone parents or guardians• After consultation, phone police.	<ul style="list-style-type: none">• Ask other pupils• Search obvious places• Wait until next registration <hr/> <ul style="list-style-type: none">• Re-categorise to URGENT and contact the Duty SLT member, and Headmaster.

APPENDIX 3

Missing Child Policy (EYFS and KSI) SMH, Pre-Prep

Policy Statement

Children's safety is our highest priority, both on and off the premises. Every attempt is made to ensure the security of children is maintained at all times. In the unlikely event of a child going missing, our missing child procedure is followed.

Procedures

Child going missing on the premises

As soon as it is noticed that a child is missing, staff alert the Head of Pre-Prep or

Foundation Stage Coordinator, in the first instance. The following actions will be taken:

- A full headcount is taken against the register to ensure no other child is missing.
- Staff will carry out a thorough search of the building and surrounding area.
- Doors and gates are checked to see if there has been a breach of security.
- If the child is not found, the Assistant Head (lower school) and the Headmaster are informed and a more thorough search of the whole school grounds is conducted.
- If that action fails to locate the child, parents/guardians, or other suitable person, will be contacted to notify them of the situation. •
- If child is still "missing", the police will be contacted.

NB. This serves as a maximum set of parameters. Timings for notification will be shortened in accordance with the circumstances and time of day that the child is reported as "missing". This protocol should be read in conjunction with the Critical Incident Management Policy.

Child going missing on an outing

As soon as it is noticed that a child is missing, the staff members on the outing will take the following measures:

- Ask children to stand with their designated carer and carry out a headcount to ensure that no other child has gone missing.
- One staff member searches the immediate vicinity, but does not search beyond that.
- Our senior staff member on the outing contacts the police and reports that a child is missing.
- The Headmaster is contacted immediately and the incident is recorded.
- Parents are contacted.
- Our staff take the remaining children back to the setting as soon as possible.
- According to the advice of the police, a senior member of staff should remain at the site where the child went missing and wait for the police to arrive.

- Our staff keep calm to avoid other children become anxious or worried.

The Investigation

- Ofsted are informed as soon as possible and kept up-to-date with the investigation.
- We will explain the process of the investigation to the parent(s) who may also raise a complaint with us or Ofsted.
- A full investigation is carried out, taking written statements from all our staff and volunteers who were present. Each member of staff present writes an incident report detailing:
 - The date and time of the incident.
 - Where the child went missing from e.g. the setting or an outing venue.
 - Which staff/children were in the premises/on the outing and the name of the staff member who was designated as responsible for the missing child.
 - When the child was last seen in the premises/on the outing, including the time it is estimated that the child went missing.
 - What has taken place in the premises/on the outing since the child went missing.
 - The report is counter-signed by the senior member of staff and the date and time added.
- A conclusion is drawn as to how the breach of security happened – lessons learnt, procedures reviewed.
- If the incident warrants a police investigation, all our staff co-operate fully. In this case, the police will handle all aspects of the investigation including interviewing staff and parents. Children’s social care may be involved if it seems likely that there is a child protection issue to address.
- In the event of disciplinary action needing to be taken, Ofsted are advised.
- The insurance provider is informed.

Managing People

Missing child incidents are very worrying for all concerned. Part of managing the incident is to try to keep everyone as calm as possible. The other children are also sensitive to what is going on around them; they too may be worried. Our remaining staff caring for them need to be focused on their needs and must not discuss the incident in front of them. They should answer children’s questions sensitively and honestly in a reassuring manner. Our staff may feel worried about the child, especially the key person or the designated carer responsible for the safety of that child for the outing. They may blame themselves and their feelings of anxiety and distress will rise as the length of time the child is missing increases. Staff may be the understandable target of parental anger and they may be afraid. We will ensure that any staff under investigation are not only fairly treated but receive support while feeling vulnerable. A Single Point of Contact will be arranged for individual members of staff.

Parents/Carers

Parents may feel angry and fraught. They may want to blame our staff and may single out one staff member over others. When dealing with a distraught and angry parent there should always be two members of staff, one of whom is a Senior Manager. No matter how understandable the parent’s anger may be, aggression or threats against our staff are not tolerated and the police should be called if this

is the case.

Staff Support

In accordance with the severity of the final outcome, our staff may need counselling and support. Our staff must not discuss any missing child incident with the press. Statements to the press may only be made by the Headmaster or a delegated colleague.

APPENDIX 4

Uncollected Child Policy (EYFS and KSI) SMH, Pre-Prep

Policy Statement

In the event that a child is not collected by an authorised adult, by their expected collection time, we put into practice agreed procedures. The child will receive a high standard of care in order to cause as little distress as possible. We inform parents/carers of our procedures so that, if they are unavoidably delayed, they will be reassured that their child will be properly cared for.

Procedures

Parents are asked to provide the following specific information when their child starts attending Stonyhurst which is recorded on their child's Registration Form:

- Home address and telephone number - if the parents do not have a telephone, an alternative number must be given, perhaps a neighbour or close relative. A minimum of two numbers should be available (KCSIE, 2025).
- Place of work, address and telephone number (if applicable).
- Mobile telephone number (if applicable).
- Who has parental responsibility for the child.

Parents have the responsibility of informing the school of any person who does not have legal access to the child or who have not been given permission to collect their child for any reason. Where necessary and/or appropriate, the school may ask to be provided with court orders or agreements. This information will be held on a child's safeguarding/child protection file.

On occasions when parents are aware that they will not be at home or in their usual place of work, we encourage them to inform us of how they can be contacted.

On occasions when parents, or the persons normally authorised to collect the child, are not able to collect the child written permission with details of the name, address and telephone number of the person who will be collecting their child. A password is agreed to verify the identity of the person who is to collect their child; this information is recorded on the Collection Details form which is available in Hodder House.

Parents are informed that, if they are not able to collect the child as planned, they must inform the school so that we can begin to take back-up measures.

If a child is not collected at their expected collection time, we follow the procedures below:

1. Check the message book/message boards and ask staff if they have been informed verbally or via email about changes to the normal collection routines.
2. If no information is available, parents/carers are contacted at home or at work.
3. If this is unsuccessful, other adults who are authorised by the parents to collect their child are contacted.
4. All reasonable attempts are made to contact the parents or nominated carers.
5. the child does not leave the premises with anyone other than those with given permission from

parents/carers.

6. If in Teatime Club hours, the child will be cared for within this facility.
7. If no-one collects the child after Teatime club has closed and efforts to contact designated persons have failed, the child be cared for by duty staff in Prep playroom until 6:15pm and will then join the Boarding pupils.
8. After consultation, the police and the Local Authority social care (0300 123672 or 03001236721-out of hours and weekends) will be contacted and the child will be cared for by boarding staff in the short term. This procedure ensures the safety and welfare of the child without removing them from the school setting.
9. The child stays at the setting until they are safely collected either by the parents, designated collection person or by a social care worker.
10. Social care will aim to find the parent or relative. If they are unable to do so, the child will become looked after by the local authority.
11. Under no circumstances will we go to look for the parent, nor leave the setting premises with the child.
12. We ensure that the child is not anxious and do not discuss concerns in front of them.
13. A full written report of the incident is recorded on CPOMS and in the child's safeguarding file.

Depending on circumstances, we reserve the right to charge parents for the additional hours worked.

Ofsted may be informed (08456 404040) and ISI may also be informed (0207 600 0100).

5 Key Safeguarding Contacts

APPENDIX 5 Key Safeguarding Contacts

CYP Safeguarding Schools Advisers Victoria Wallace, Mechelle Lewis & Sarah Holyhead	01772 531196 safeguardingadvice@lancashire.gov.uk school.safeguarding@lancashire.gov.uk
LCC MASH Education Officers	Martine Blokland 01772 531643 martine.blokland@lancashire.gov.uk Matt Chipchase 01254 220989 matt.chipchase@lancashire.gov.uk
LADO – Local Authority Designated Officer	01772 536694 LADO.admin@lancashire.gov.uk
MASH – Multi-Agency Safeguarding Hub	0300 123 6720 (emergencies: 0300 123 6722 between 5.00pm - 8.00am)
Children’s Safeguarding Assurance Partnership	Concerns about a child should be reported on 0300 123 6720 or out of hours 0300 123 6722 (5pm - 8am)
Multi-Agency Risk Management Conference	Amy Grundy amy.grundy@lancashire.police.uk
NSPCC Whistleblowing Helpline	Tel: (0800) 0280285
Lancashire Whistleblowing/Complaints Line	(01772) 532500 WhistleblowingComplaints@lancashire.gov.uk
Lancashire Constabulary Diversity and Hate Crime (inc. FGM)	(01254) 353540
Police Prevent Team and Channel Support	01772 413029
Fahim Chati, Channel Coordinator (Lancashire and Cumbria), Community Safety Team	Tel: 01254 585260 (DD 585716) Channel team mailbox: channel@blackburn.gov.uk https://www.blackburn.gov.uk/crime-prevention

Children Missing Education Officer, Lancashire County Council	01254 220690/07900405948
Child Sexual Exploitation Team	0845 1253545 and ask for the division in Lancashire
Private Fostering	https://www.lancashire.gov.uk/children-education-families/keeping-children-safe/private-fostering/
SEND Support	https://www.lancashire.gov.uk/practitioners/supporting-children-and-families/send/
Ofsted	Telephone: 08456 404040 Email: enquiries@ofsted.gov.uk Internet: www.ofsted.gov.uk (for their most recent report online)
Children's Commissioner	https://www.childrenscommissioner.gov.uk/about-us/ 0800 528 0731
ISI	ISI, Cap House, 9-12 Long Lane, London, EC1A 9HA. Tel: 0207 600 0100
Lancashire Constabulary	Chipping and Longridge: 01772 209583 Clitheroe, Ribble Valley, Ribchester, Alston and Hothersall 01772 209583 101
Society of Jesus, British Province Safeguarding Coordinator (Julie Ashby- Ellis)	safeguarding@jesuit.org.uk 07715 669128

APPENDIX 6 Acronyms

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

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSC	Children's social care	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.

FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC / CLA	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC / PCLA	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.

SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for; all children who currently have, or previously had, a social worker and all children in kinship care arrangements.

APPENDIX 7 SPECIFIC SAFEGUARDING ISSUES

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

Here are the issues covered:

1. Domestic abuse
2. Homelessness
3. Children absent from education
4. Child abduction and community safety incidents
5. Children Attending an Approved educational Activity
6. Child criminal exploitation (CCE)
7. County Lines
8. Cyber-crime
9. Child Sexual Exploitation (CSE)
10. Modern slavery
11. Female Genital Mutilation (FGM)
12. Virginity testing and hymenoplasty
13. Forced marriage
14. Extremism and Radicalisation
15. Pupils with family members in prison
16. Pupils required to give evidence in court
17. Mental health
18. Concealed and Denied Pregnancy
19. Serious violence
20. Adult involvement in youth-produced sexual imagery

1. Domestic abuse

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

psychological or emotional abuse, or another form of abuse. **“Personally connected”** includes people who:

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

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Stonyhurst has commitment to Operation Encompass and informing all stakeholders of the initiative. The DSL is the lead person for Operation Encompass www.operationencompass.org.

2. Homelessness

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

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

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

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

3. Children absent from education

Staff will be aware a child being absent from school is a potential indicator of abuse or neglect and, as such, these pupils are particularly at risk of being victims of harm, sexual and criminal exploitation, forced marriage, female genital mutilation or radicalisation. Staff will monitor pupils that are absent from school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, and in accordance with the School Attendance Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school’s permission for a continuous period of 10 school days or more, in accordance with LA protocol.

Where reasonably possible schools and colleges **will hold more than one emergency contact number for their pupils and students.**

Stonyhurst will follow local guidance when children go missing from home

<https://trixcms.trixonline.co.uk/api/assets/panlancashirescp/439f241d-177b-4dfe-8f77-d2ee28141ad7/joint-proto.pdf>.

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

Admissions register

Pupils' names will be entered on the admission register on the first day that the school and a person with control of the pupil's attendance have agreed that the pupil will attend the school. If no date has been agreed or notified, the pupil's name must be entered on the first day they attend the school. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register and must provide the LA with all the information held within the admission register about the pupil.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. If a pupil fails to attend school on the agreed starting day, the school will follow this up and try to establish the reason for absence. If they are unable to locate the pupil, the school will notify the LA.

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

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will start normally living there.

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

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

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

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the School Attendance (Pupil Registration) (England) Regulations 2024 (as amended), where :

- The pupil has been registered at another school;
- The pupil will not continue at the school following the completion of nursery education;

- The pupil is also registered at one or more other schools and the other schools have agreed the deletion;
- The pupil has a school attendance order which has been changed to name another school;
- The pupil had a school attendance order which has been revoked;
- The parent of the pupil has notified the school in writing that the pupil will be leaving the school to be educated otherwise than at school;
- The pupil no longer normally lives a reasonable distance from the school;
- The pupil has not returned within ten days following a leave of absence and reasonable efforts have been made to find out the pupil's location and circumstances;
- The pupil has been continually absent from school for 20 school days and the school has made reasonable efforts to find out the pupil's location and circumstances;
- The pupil is detained under a sentence of detention and there are not reasonable grounds to believe the pupil will return to school following their detention;
- The pupil has died;
- The pupil is over compulsory school age and will not continue into sixth form;
- The pupil has been permanently excluded from school.

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

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

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

The grounds for removal from the admissions register under regulation 9 of the School Attendance (Pupil Registration) (England) Regulations 2024 (as amended) and further guidance can be found in Chapter 7 of statutory guidance "Working together to improve school attendance" (2024).

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

Children Attending an Approved educational Activity

An approved educational activity is where a pupil is taking part in off-site activity such as field trips, educational visits, work experience or unregistered alternative provision.

Pupils can only be recorded as attending an off-site activity if it is approved by the school, of an educational nature and supervised by someone authorised by the school. Ultimately, schools are responsible for the safeguarding and welfare of pupils taking part in an off-site educational activity. The school will need to be satisfied that appropriate measures have been taken to safeguard the pupil. The school will ensure that they have in place arrangements whereby the provider of the educational activity notifies the school of any absences by the pupil.

Such activities include:

- attending transition days at other schools;
- attending courses at college;
- attending unregistered alternative provision arranged by the school.

All relevant school policies continue to apply throughout any approved educational activity. Any activity which is approved will be risk assessed (where relevant) and school will ensure that attendance at any activity is monitored and robust communication is agreed with the provider/accompanying adults.

4. Child abduction and community safety incidents

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

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

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

5. Child criminal exploitation (CCE)

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

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

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.

- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

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

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

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

6. Child Sexual Exploitation (CSE)

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

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

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil’s immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

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

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.

- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All staff will consider the language and terms used when raising concerns and providing ongoing support to pupils who have experienced abuse through exploitation to ensure victims are not unintentionally blamed or seen as active participants in their own abuse.

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

7. County lines

For the purposes of this policy, **“county lines”** refers to gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children are exploited to move, store or sell drugs and money.

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

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

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

lines activity will immediately report all concerns to the DSL.

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

8. Cyber-crime

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

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

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

9. Modern slavery

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

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

10. Female Genital Mutilation (FGM)

For the purposes of this policy, **“FGM”** is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs.

FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

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

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they **must** personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to,

they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

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

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

Indicators that FGM may take place soon include:

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

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

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

FGM is included in the definition of so-called **“honour-based’ abuse (HBA)”**, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will

consult with the DSL who will activate local safeguarding procedures if concerns arise.

11. **Virginity testing and hymenoplasty**

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

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination of the female genitalia, with or without consent, for the purpose (or purported purpose) of determining virginity. This can occur with or without physical contact. Vaginal examination has no established scientific merit or clinical indication.

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

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

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

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

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

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously

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

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

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

12. Forced marriage

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

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

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

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

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

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

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

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

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

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis. Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

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

The school will support any victims to seek help by:

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

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

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

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school’s RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help.

Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

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

13. Extremism and Radicalisation

For the purposes of this policy, **“radicalisation”** refers to the process of a person legitimising support for, or use of, terrorist violence.

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

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

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

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

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

The Online Safety Policy will support the safeguarding of children online by ensuring they cannot access terrorist and extremist material when using the internet and that suitable filtering and monitoring software and supervision is in place.

The DSL understands when it is appropriate to make a referral to the Channel Panel and are aware of how to do so. 'Notice. Check. Share.'

Stonyhurst has an up-to-date risk assessment.

14. Pupils with family members in prison

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

15. Pupils required to give evidence in court

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

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

Pupils will be provided with the booklet '[Going to Court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

16. Mental health

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

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

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

The school will access a range of advice to help them identify pupils in need of additional mental health

support, including working with external agencies.

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

17. Concealed and Denied Pregnancy

A concealed pregnancy is when a woman knows she is pregnant but does not tell any professional; or when she tells a professional but conceals the fact that she is not accessing antenatal care; or when she tells another person or persons and together they conceal the fact from all health agencies. A denied pregnancy is when an expectant mother is unaware of or unable to accept the existence of her pregnancy. Physical changes to the body may not be present or be misconstrued; they may be intellectually aware of the pregnancy but continue to think, feel and behave as though they were not pregnant. There may be a number of reasons why a pregnancy is concealed or denied, including, but not limited to; fear of stigma or shame, in cases of rape, sexual or domestic abuse. In some cases the woman may be truly unaware that she is pregnant. In some cases an expectant mother may be in denial of her pregnancy.

Where there is a suspicion of a concealed or denied pregnancy, the school will follow the procedures set out by our local Safeguarding Children Partnership arrangements. [Concealed and Denied Pregnancies](#)

Further training is available for staff regarding concealed or denied pregnancy. [Concealed-and-Denied-Pregnancy-2020-7MB.pdf](#) (lancashiresafeguarding.org.uk).

18. Serious violence

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

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

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

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

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

The school will cooperate with core duty holders when asked and ensure arrangements are in place to do so.

19. Adult involvement in youth-produced sexual imagery

The school's full response to youth-produced sexual imagery (YPSI) is outlined in the Youth-produced Sexual Imagery Policy.

Sexually motivated incidents

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

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

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered something of value such as money or gaming credits.
- Being threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images.

Financially motivated incidents

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

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

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

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

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

APPENDIX 8

Youth Produced Sexual Imagery (YPSI) Policy

1. Statement of Intent

- 1.1 Stonyhurst and St Mary's Hall (including EYFS) is committed to safeguarding and supporting all pupils and staff both inside and outside of school against all the facets and complex issues surrounding youth-produced sexual imagery (YPSI). This approach will be informed by a whole-school safeguarding strategy and will always focus on ensuring the mental and physical wellbeing of pupils and staff members.
- 1.2 This good practice policy provides a clear and consistent framework for the DSL and the headteacher in delivering this promise, as well as ensuring members of the governing board, headteachers, and staff understand their responsibilities under safeguarding legislation. It aims to assist the school in ensuring policies and procedures regarding YPSI are clear and easily understood by staff, pupils, and parents. It aims to also provide the school with a foundation for teaching pupils what behaviour is acceptable and unacceptable.

2. Legal Framework

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

DfE and UK Council for Internet Safety (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

DfE and UK Council for Internet Safety (2024) 'Sharing nudes and semi-nudes: how to respond to an incident (overview)'

DfE (2025) 'Keeping children safe in education 2025' Ministry of Justice (2015) 'Revenge Porn: the facts'

Data Protection Act 2018

The UK General Data Protection Regulation (UK GDPR)

Voyeurism (Offences) Act 2019

Protection of Children Act 1978

Sexual Offences Act 2003

Criminal Justice and Courts Act 2015

2.2 This policy operates in conjunction with the following school policies:

- Safeguarding and Child Protection (including Child-on-Child) Policy
- Anti-bullying Policy
- Complaints Procedures Policy
- Behaviour Management (including Searching, Screening and Confiscation) Policy
- Social Media Policy
- Staff Code of Conduct
- Online Safety Policy
- Data Protection Policy

3. Roles and Responsibilities

3.1. The Head is responsible for:

- Safeguarding pupils' wellbeing.
- Overseeing staff training on YPSI with the DSL.
- Reviewing this policy at least annually.
- Providing parents with suitable information and support on YPSI.
- Liaising with the DSL on any incidents involving YPSI and supporting the DSL in the decisions they make regarding the incidents.
- Ensuring that relevant policies and procedures are followed by staff members.
- Ensuring that, upon induction, new staff members are provided with copies of the policies and procedures they need, including the Safeguarding and Child Protection Policy, and parts one, two, and five of 'Keeping children safe in education'.

3.2. The governing body is responsible for:

- Ensuring the Head has effectively implemented this policy.
- Monitoring the effectiveness of the procedures set out in this policy and its implementation across the school.
- Facilitating a whole-school approach to handling incidents of YPSI; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Ensuring that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to handling incidents of YPSI.
- Ensuring the school has clear systems and processes in place for identifying possible safeguarding issues, including clear routes to escalate concerns and clear referral and accountability systems.

3.3. Staff are responsible for:

- Ensuring pupils are fully informed and are aware of suitable support systems regarding YPSI.
- Safeguarding pupils' wellbeing in relation to YPSI.
- Providing a safe environment in which pupils can learn.
- Being aware of the indicators of abuse.
- Maintaining appropriate levels of confidentiality when dealing with individual cases.
- Always acting in the best interest of the child in their respective cases.
- Reporting any safeguarding concerns to the DSL.
- Adhering to the procedures set out in this policy.
- Promoting dialogue and understanding, and ensuring all pupils feel listened to and understood.
- Empowering pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.

3.4. SENCO is responsible for:

- Liaising with the DSL, Head, and relevant staff members when responding to an incident of YPSI involving SEND pupils.
- Considering and enacting the appropriate arrangements for SEND pupils involved in YPSI incidents.

3.5. The DSL is responsible for:

- Initiating and managing initial responses to incidents involving YPSI, in conjunction with relevant staff members, and in relation to the Child Protection and Safeguarding Policy.
- Initiating and managing responses to incidents of upskirting with relevant staff members and in line with the Child Protection and Safeguarding Policy.
- Organising and managing initial review meetings to consider evidence and establish risk.
- Handling referrals to children's social care and/or the police.
- Deciding the eventual response to any incidents of YPSI in conjunction with the headteacher.
- Handling the viewing of any YPSI, when it is necessary to do so, in conjunction with the headteacher.
- Conducting interviews with pupils involved in YPSI incidents, with relevant staff members.

- Recording details of YPSI incidents in line with the Data Protection Policy.
- Supporting affected pupils and providing information about the seriousness of the issue and the law surrounding YPSI.

4. Definitions

- 4.1 “Youth-produced sexual imagery” is defined as the sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline.
- 4.2 The “sharing of nudes and semi-nudes” can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.
- 4.3 “Nude or semi-nude images”, videos or live streams may include more than one child or young person. The term ‘nudes’ is used as it is most commonly recognised by young people and more appropriately covers all types of image-sharing incidents.
- 4.4 “Indecent imagery” is the term for making, possessing, and distributing any imagery of someone under 18 which is ‘indecent’, and is illegal. This includes imagery of yourself if you are under 18. The term “Child Sexual Abuse Material” (CSAM) can also be used to describe indecent images of children. ‘Indecent’ is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or district judge to decide based on what is the recognised standard of propriety.
- 4.5 Indecent imagery does not always mean nudity; however, images are likely to be defined as such if they meet one or more of the following criteria:
- Nude or semi-nude sexual posing (e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear)
 - Someone nude or semi-nude touching themselves in a sexual way
 - Any sexual activity involving a child
 - Someone hurting someone else sexually
 - Sexual activity that includes animals
- 4.6 “Pseudo-images” are computer-manipulated and/or -generated images that otherwise appear to be a photograph or video. This includes images and videos that are created using tools such as photo / video editing software, deepfake apps and generators and AI text-to-image generators.
- 4.7 “Image-based sexual abuse” refers to the non-consensual sharing of nudes and semi-nudes.
- 4.8 “Sexting” is the wording used by many adults to encompass the broad array of YPSI, however many young people interpret ‘sexting’ as writing and sending explicit messages with people they know, rather than images or videos.
- 4.9 “Revenge porn” is the sharing of private, sexual materials, either photos or videos of another person without their consent and with the intention of causing distress or embarrassment. It is a criminal offence.
- 4.10 “Sextortion” is the coercion or blackmail of a child or young person into sending nude or semi-nude images or making a payment – also known as financially motivated sexual extortion.
- 4.11 **“Deep fakes” and “deep nudes” are terms used to describe images and videos that have been digitally manipulated or AI-generated to look like real images and videos.**

5. Upskirting

- 5.1 Upskirting is an offence. Under the Voyeurism (Offences) Act 2019, “**upskirting**” refers to the

capturing of an image or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification or cause the victim humiliation, distress or alarm.

5.2. The school has a zero-tolerance stance on upskirting incidents. Despite the name, anyone, including pupils and staff, of any gender, can be a victim of upskirting.

5.3. Any incidents of upskirting will be reported to the DSL and handled in accordance with the school's Child Protection and Safeguarding Policy.

6. Awareness of YPSI

6.1. Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful.

6.2. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

6.3. Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted. Similarly, the school understands that the sharing of an image of a child – even if it has been shared with consent – is a criminal offence.

6.4. The school will ensure that staff treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos as a safeguarding concern. Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible.

6.5. Staff members will receive training about YPSI on an annual basis which will address, but is not limited to, the following:

- What YPSI is and how young people engage in it
- The legalities surrounding YPSI
- School staff's responsibility to be aware of YPSI
- How to recognise instances of YPSI
- How to understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful
- How to respond to any concerns or disclosures of YPSI
- The school's response to instances of YPSI

Educating children on the sharing of sexual images

6.6. The school adopts a whole school approach to safeguarding and will ensure that children are given the skills and knowledge to keep themselves safe and develop positive, healthy and respectful relationships. Children will be taught in RHE, RSHE and computing lessons that the sharing and viewing of indecent images of children, including those created by children, is a criminal offence. They will also be taught to understand and recognise healthy and unhealthy behaviours and what is normal or acceptable behaviour.

6.7. Pupils will also be educated about YPSI, including but not limited to, the following:

- What YPSI is and how young people engage in it
- The legalities surrounding YPSI
- Who they should speak to if they have concerns
- How to report explicit images and messages
- The school's response to YPSI

6.8. Parents will also be provided with information on an annual basis regarding YPSI and the school's response. Information will be distributed to parents at the beginning of each academic year via letter from the Head of PSHE.

6.9. The school will ensure pupils are informed about the laws surrounding YPSI and that these laws include the creation and sharing of digitally manipulated and AI-generated images and videos.

7. Context of Safeguarding Incidents

- a. The school is aware that safeguarding incidents can occur outside of school and can be associated with outside factors. Given the nature of incidents involving the sharing of YPSI, it is highly likely that the incident has occurred outside of the school day, and off the school premises.
- b. Staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents and undertake an assessment of pupils' behaviour to consider whether there are wider environmental factors that are a threat to their safety and/or welfare.
- c. The school will provide as much contextual information as possible when making referrals to children's social care (CSC).

8. Coordinating a Response to Incidents of YPSI

8.1. All incidents of YPSI will be handled in accordance with the school's Child Protection and Safeguarding Policy.

8.1.1. When responding to incidents the school will be guided by the principle of proportionality, with the primary concern at all times being the welfare and protection of any children involved.

8.1.2. The school understands that the law surrounding the creation and sharing of the indecent imagery of children was intended to criminalise adults seeking to sexually abuse children, and not to criminalise the children themselves.

8.1.3. Where a YPSI incident occurs, the school will initiate the following response:

- The incident will be referred to the DSL immediately
- The DSL will hold an initial review meeting with the necessary school staff
- The DSL, and other relevant staff members if appropriate, will conduct interviews with all pupils involved
- Parents of the pupils involved will be informed as soon as possible and involved in the school's response, unless doing so would put a pupil at further risk of harm
- Where a pupil has been physically harmed, or is at risk of physical harm, the incident will be

referred to children's social care and/or the police without delay

8.2. Disclosure

8.2.1 All staff have a duty to recognise and refer any incidents involving YPSI and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

8.2.2. Staff will be made aware that a child who discloses that they are the subject of an incident of YPSI is likely to be embarrassed and worried about the consequences. It is likely that disclosure of their concerns within school is a last resort, and they may have already tried to resolve the issue themselves.

8.2.3. When a disclosure is made, staff will ensure the child is feeling comfortable and that appropriate and sensitive questions are asked, in order to minimise further distress or trauma to them.

8.2.4. Any direct disclosure by a child or young person will be taken seriously and staff will follow the procedures as set out in the school's Safeguarding and Child Protection Policy.

8.3. The initial review meeting

8.3.1. During the initial review meeting, the DSL will meet with any and all relevant staff members, and aim to establish:

- Whether there is an immediate risk to the pupil or pupils involved.
- If a referral should be made to CSCS and/or the police.
- Whether it is necessary for the DSL to view the imagery and/or message **in most cases, images or videos should not be viewed.**
- What further information is needed to decide on the best course of action.
- Who has created the nude or semi-nude? For example, is it an AI-generated image shared by another child or young person?
- Whether the imagery and/or message has been shared widely and via what services or platforms, e.g. on social media.
- Whether immediate action needs to be taken to delete or remove images and/or messages from devices or other platforms.
- If there are any relevant facts about the pupils involved that need to be considered when conducting assessment of risk.
- If any other schools, colleges, settings or individuals need to be contacted.
- How parents will be informed of and involved in the school's response.

8.4. Assessment of risk

8.4.1. Assessing risk will be aided by considering behaviour and the motivations involved in the incident. These can be wide-ranging and move fluidly along a continuum from normal to violent and abusive behaviours. The school will always take into account that isolated inappropriate or problematic behaviour may not always be indicative of a pupil's overall sexual behaviour.

8.4.2. The school will use the DfE guidance to define and assess incidents according to individual motivations. Incidents may be described as:

Aggravated – incidents involving abusive elements beyond the creation, sharing or possession of YPSI, or involving adult criminal behaviour. These can further be sub-categorised into:

- **[New] Adult involved:** involving sexually and/or financially motivated incidents.
- **[New] Youth only – intent to harm:** arising from inter-personal conflict.
- **[New] Youth only – reckless misuse:** pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result.

Experimental – incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can further be subcategorised into:

- **[New] Romantic:** whereby young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair.
- **[New] Sexual attention seeking:** it is important to note that incidents within this category can be a part of normal childhood. A young person should not be blamed for taking and sharing their image.
- **[New] Other:** cases that do not appear to have aggravating elements, but also do not fit into the Romantic or Attention Seeking sub-types, such as for a young person's self-use, or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

8.4.3. Staff, and particularly the DSL and deputy DSL, will be vigilant for YPSI incidents that may at first appear to be child-on-child abuse, e.g. where an adult is pretending to be a child online in order to obtain indecent images.

8.4.4. The DSL will make an immediate referral to CSC and/or police if, at the initial review stage, it is determined that:

- The incident involves an adult or is suspected to involve an adult posing as another child.
- A pupil has been coerced, blackmailed, or groomed, or if there are concerns about their ability to provide consent.
- What the school knows about the incident suggests the content depicts sexual acts that are unusual for the pupil's developmental stage.
- The image involves sexual acts and the pupil in the imagery is under the age of 13.
- The image shows violence.
- The school has reason to believe that a pupil is at immediate risk of harm as a result of the image and/or message being shared.

8.4.5. Where none of the criteria above apply, the DSL, in conjunction with the headteacher, will determine the appropriate response and may choose not to involve children's social care or the police; however, if further information comes to light, the DSL may decide to escalate the incident at any stage.

8.4.6. The DSL will only decide not to refer the case to CSC and/or the police if they are confident that the risks can be managed effectively by the school. The best interests of the pupils involved, and their welfare, will be central to the DSL's decision.

8.4.7. When assessing risk, the DSL will seek to ascertain the answers to the following questions:

- Why was the image shared?
- Was it consensual or was the child coerced or put under pressure to produce it?
- Has the image been shared beyond its intended recipient?
- Was it shared without the consent of the child who produced the image?
- Has the image been shared on social media or elsewhere online?
- What steps have been made to contain the spread?
- How old are the children involved?
- Did the child send the image to more than one person?
- Are there any concerns about the child's vulnerability?
- Are there any additional concerns if the parents are informed of the incident?

8.4.8. The DSL will always use their professional judgement in conjunction with that of their colleagues when assessing incidents. When considering the information gained, they will decide whether:

- A child is at risk of harm, in which case a referral will be appropriate.
- Additional information or support is needed from other agencies.
- The school can manage the incident and support any child directly.

8.4.9. If a pupil has shared an image and/or message consensually, and there is no intended malice, the school will resolve the incident directly, without involvement from other stakeholders. If a pupil has shared an image, message or video as a result of interpersonal conflict such as break-ups or fights, the incident will be managed in line with the school's Safeguarding and Child Protection (Child-on-child Abuse) Policy.

9. Supporting Children Involved in Incidents

- a. Once the school have assessed that a child is not at immediate risk, the DSL will have a conversation with them to decide on the best course of action. The school is aware that it is important for the child to be given a sense of control over the reporting process and, where possible, will be given the option of speaking with a different member of staff if they feel more comfortable doing so. In these cases, the DSL will support the member of staff to make sure the conversation is handled appropriately, and they feel confident in discussing the incident.
- b. The purpose of the conversation will be to:

- Identify, **without viewing wherever possible**, what the image contains and whether anyone else has been involved.
 - Find out whether the image has been shared between two people or shared further, if known.
 - Discuss what actions and support might be needed, including preventing further distribution.
- c. During this discussion the DSL will:
- Reassure them that they are not alone, and that the school will do everything they can to help and support them.
 - Inform them that staff recognise the pressures that children can be under to take part in sharing an image and, if relevant, that support can be offered to their parents to understand the wider issues and motivations around this.
 - Reassure them that they will be kept informed throughout the process.
 - Remain solution-focused and avoid any victim-blaming questions such as ‘why have you done this?’
 - Help them understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the images.
 - Discuss issues of consent and trust within healthy relationships.
 - Explain the law on the sharing of indecent imagery, and that the law is in place to protect children rather than criminalise them.
 - Advise them on useful tools that can be used to report and remove images online, such as:
 - The Internet Watch Foundation (IWF) and Childline’s [Report Remove tool](#)
 - The National Center for Missing & Exploited Children’s (NCMEC) [Take It Down tool](#) which can be used to help them anonymously remove images that have yet to be shared online but they think might be.
- d. In addition to these discussions, the DSL will also advise children on the appropriate course of action depending upon the circumstances and context of the incident, as set out below:

9.1 For **children who have had their nudes or semi-nudes shared publicly**, the DSL will reassure them that they have done the right thing by speaking to an adult and that the education setting and other adults are there to help and advise them:

- To delete images or videos from social media accounts, including from cloud photo backups, if they have uploaded them themselves.
- To use the available tools to report and remove images online, as detailed above.

- How to report sexual images or videos on individual sites to get them taken down.
- To contact their mobile phone operator and have their number changed to stop others from contacting them, where appropriate.
- To speak to the school if they are concerned about any bullying behaviour.

9.2 For **children who have been sent a nude or semi-nude**, the DSL will reassure them that they have done the right thing by speaking to an adult and that the education setting and other adults are there to help, ask whether it was sent by an adult or another child and if they requested to see the photo or if it was sent unsolicited and advise them:

- On the importance of reporting it online if it has been shared.
- To delete it from their devices and accounts.
- On the importance of not sharing the image further.
- That, if they asked to receive the photos, explain that they should not put pressure onto others to do things that they are uncomfortable with.

9.3 For **children who have shared another child's or young person's nudes or semi-nudes**, and for **children who have created a nude or semi-nude of another child and shared it**, the DSL will:

- advise them the laws surrounding the sharing of indecent imagery.
- Ask them whether they asked for the photo or were initially sent it without requesting it.
- Who the image has been sent and where it has been shared
- Their motivation for creating and / or sharing the photo and discuss what they could have done differently.

10. Informing and Supporting Parents

10.1. The school will inform parents of an incident at the earliest available opportunity, unless informing them will put a child at risk of harm. Any decision not to inform the parents will be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.

10.2. The DSL will support children involved with determining the best approach for informing parents and allow them to be a part of this process if they want to be.

10.3. When working with parents, school staff will be mindful of the sensitive and emotive nature of these incidents. In all situations the school will ensure that parents are:

- Given information about the sharing of nudes and semi-nudes, what they can expect to happen next, and who will be their link person within the education setting.

- Given support to deal with their own feelings of upset and concern, including signposting to further resources that can help them to understand the sharing of nudes and semi-nudes or support services they can contact, where appropriate.
- Given support on how to speak to their child about the incident.
- Advised on the law around the sharing of nudes and semi-nudes.
- Kept updated about any actions that have been taken or any support that their child is accessing, unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision.
- Informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened. This could include speaking to a Childline counsellor [online](#) or on 0800 11 11, in house counselling services where available, or a GP. If they are concerned that their child is suicidal, they should contact 999.
- Directed to the [National Crime Agency - Child Exploitation and Online Protection](#) (NCA-CEOP) if the child discloses any further details to them that may suggest they are being groomed or sexually exploited.

10.4. In addition to these discussions, the DSL will also advise parents on the appropriate course of action depending upon the circumstances and context of the incident their child is involved with, as set out below:

10.5. For **parents whose child has had their nudes or semi-nudes shared publicly**, the DSL will advise them:

- To stay calm and refrain from getting angry with their child.
- To help their child delete images or videos from social media accounts, including from cloud photo backups, if they have uploaded them themselves.
- Support their child to use the available tools to report and remove images online, as detailed above.
- To report sexual images or videos on individual sites to get them taken down.
- To contact their mobile phone operator and have their number changed.
- To speak to the school if they are concerned about any bullying behaviour.
- To seek further medical advice and support if there have been similar incidents or they are worried about inappropriate sexual behaviour for their age.

10.6. For **parents whose child has been sent nudes and semi-nudes**, the DSL will advise them:

- To listen to their child's concerns without criticising their decisions.
- To help their child delete images or videos from social media accounts, including from cloud photo backups.
- To consider ways that their child could speak to the sender to stop future correspondences or if the child prefers, how to block the sender.
- To report sexual images or videos on individual sites to get them taken down.
- How to discuss with their child issues of consent and trust within healthy relationships.

10.7. For **parents whose child has shared another child's nudes or semi-nudes**, the DSL will advise them:

- To stay calm and refrain from getting angry with their child.
- How to discuss with their child issues of consent and trust within healthy relationships.
- To contact the school and/or seek further medical advice and support if they are concerned that their child is behaving in a sexually inappropriate way, or if similar incidents have previously occurred.

11. Multi-Agency working

- a. The school will develop trusting relationships between families and agencies to protect the welfare of its pupils and collaborate with services to achieve shared goals and share information.
- b. In circumstances where a referral is appropriate to any external agency, such as police or social care the school will follow the provisions on managing referrals and multi-agency working set out in the Safeguarding and Child Protection Policy.
- c. The school recognises the importance of proactive information sharing between professionals and local agencies and will be aware that data protection regulations do not act as a barrier to sharing information where failure to do so would result in pupils being placed at risk of harm.

12. Searching Devices, Viewing, and Deleting Indecent Imagery

- a. In all situations staff will be made aware of their statutory responsibilities and powers and will adhere to the provisions set out in the school's Searching, Screening and Confiscation Policy.

12.2. Viewing the imagery

12.2.1. Staff and parents will not intentionally view any sexual images or video unless there is good and clear reason to do so. Wherever possible, responses to incidents will be based on what the DSL has been told about the content of the imagery.

12.2.2. All members of staff will be made aware of what they can and can't do in relation to viewing sexual images and will be expected to communicate this to any child or parent requesting that imagery be viewed.

12.2.3. The decision to view any imagery will be based on the professional judgement of the DSL and will always comply with the school's Child Protection and Safeguarding Policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to any child or involved.

12.2.4. The DSL will only make a decision to view imagery if it is:

- The only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved.

- Necessary to report it to a website, app or suitable reporting agency, such as the IWF, to have it taken down, or to support the child or parent or carer in making a report.
- Unavoidable because a child has presented it directly to a staff member or nudes or images have been found on any school devices or network.

12.2.5. Staff will not view any imagery and will instead report it to the DSL. Where it is necessary to view the image, the DSL will first discuss the decision with the headteacher, and will:

- Not copy, print, share, store or save the imagery, as this is illegal. If this has already happened, the school will contact local police for advice and to explain the circumstances.
- Ensure viewing is undertaken by themselves or another member of the safeguarding team with permission from the Head.
- Ensure the viewing takes place with another member of staff in the room – usually the headteacher.
- Ensure viewing takes place on the school premises, wherever possible, and in a private space, such as the Head's office.
- Ensure that images are viewed by an individual of the same sex as the pupil in the image, wherever possible.
- Record the viewing of the imagery in the school's safeguarding records, including the following information:
 - Who was present
 - Why the image was viewed
 - Any actions taken as a result of the image being viewed
 - Ensure these records are signed and dated by the staff members present
- Confiscate any devices, where appropriate, and take the following actions:
 - Disconnect the device from Wi-fi and data
 - Turn the device off
 - Place the device in a secure place
 - Pass the device on to police, where necessary.

12.2.6. The school is aware that viewing indecent imagery can be distressing for both children and adults. If indecent images have been viewed by a member of staff in the course of their duties the school will ensure that the staff member is provided with the appropriate emotional support.

12.3. **Deletion of imagery**

12.3.1. If a decision has been made not to make a referral to the police and/or CSCS the school will take the lead in resolving the incident and deleting any indecent imagery from devices and online platforms to limit any future sharing.

12.3.2. For incidents that have not been reported to police or children's social care, the school will record the reasons for not doing so and ensure this is signed off by the headteacher.

12.3.3. The school will also take the following actions:

- Remind the child that possession of nudes and semi-nudes is illegal
- Ask them to delete the imagery and to confirm that they have deleted them
- Give them a deadline for deletion across all devices, online storage, or social media sites
- Inform them that if they refuse or it is later discovered they did not delete the imagery, they are continuing to commit a criminal offence and the police may become involved
- Record all decisions, including times, dates and reasons for decisions made and log these in the safeguarding records
- Inform parents about the incident and actions being taken, unless this presents a further risk to any child

13. Monitoring and Review

13.1. This policy will be reviewed at least annually by the DSL and the Head. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

13.2. Any changes made to this policy will be communicated to all members of staff, parents and pupils. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is August 2026.

LDS