St Dunstan's College

PART OF
ST DUNSTAN'S EDUCATION GROUP

SAFEGUARDING AND CHILD PROTECTION POLICY

Policy Owner:	Group and School Designated Safeguarding Leads
ISSR Reference:	Part 3 - Welfare, Health and Safety of Pupils Part 4 - Suitability of Staff, Supply Staff and Proprietors Part 8 - Quality of Leadership in and Management of Schools
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Version Control Information

Reason for Amendment	Role	Date	Main Changes
Annual review	Deputy Head Pastoral	Michaelmas 2024	New template KCSIE updates
Interim Review	Deputy Head Pastoral	Trinity 2025	Update to International Students information
Interim Review	Deputy Head Pastoral	Michaelmas 2025	KCSIE updates as at 27 August 2025
Annual Review	Deputy Head Pastoral	Michaelmas 2026	KCSIE Update as of 1st September 2026

1. Aims

This policy is applicable to staff, students and parent/carers of St Dunstan's Education Group Schools and aims to ensure all parties are clear on the mechanisms through which Safeguarding and Child Protection is delivered and overseen across the school.

2. Legislation and Regulatory Framework

This policy is based on the procedures of and with regard to the following legislation and guidance:

- Keeping Children Safe in Education (September 2026)
- Working Together to Safeguard Children (March 2026)
- Early Years Foundation Stage Statutory Framework (effective September 2026)
- Prevent Duty Guidance: for England and Wales (March 2024)
- The Independent School Standards DfE Guidance (April 2026)
- Relationships education, Relationships and Sex Education (RSE) and Health Education (July 2025)
- Working together to improve school attendance (July 2026)
- Behaviour in Schools: advice for headteachers and school staff (2024)
- Filtering and Monitoring Standards (Updated August 2026)
- Cyber Security Standards for schools and colleges guidance (Updated August 2026)
- After-school clubs, community activities, and tuition (2026)
- Crime and Policing Act (2026)

3. Roles and responsibilities

3.1 St Dunstan's Education Group

St Dunstan's Education Group ('the group') is committed to safeguarding children and young people and recognises that safeguarding and promoting the welfare of children is everyone's responsibility. The Group is committed to acting in the best interests of the child at all times and to providing a safe and secure environment for all children in its care. Adults in our school take all welfare concerns seriously and encourage children to talk to us about anything that worries them. We will always act in the best interest of the child.

It is of paramount importance that all adults working for or with St Dunstan's Education Group are aware of their responsibility to safeguard and promote the health, safety and welfare (both physical and emotional) of all children in the Group, inside and outside school. All employees, governors, volunteers and other adults in regular contact with children in the care of the Group must, therefore, understand and comply with St Dunstan's Education Group Safeguarding and Child Protection Policy and related documents and take action where necessary to enable all children to have the best outcomes.

St Dunstan's Education Group has a primary responsibility for the care, welfare and safety of all pupils in our charge. We are committed to providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment, whether that is within or outside the home, including online, preventing impairment of children's mental and physical health or development and ensuring that children grow up in circumstances

consistent with the provision of safe and effective care (Working Together to Safeguard Children 2026).

External hires and out-of-school providers are responsible for their own safeguarding and child protection policies and procedures, however the school may refer any concerns they have about the provider to the local authority.

3.2 The Group Board of Trustees
The Group Board of Trustees has ultimate responsibility for safeguarding but will delegate day-to-day responsibility to the Group Chief Executive Officer (CEO), who in turn delegates responsibility to the Heads of the Group's Schools.

As stated in *Keeping Children Safe in Education*, the Group Board of Trustees is expected to:

- Have regard to the guidance outlined in *Keeping Children Safe in Education* , ensuring that policies, procedures and training in the school is effective and complies with law at all times
- Nominate a Designated Safeguarding Link Trustee to take leadership responsibility for the schools' safeguarding arrangements and to ensure all members of the Group Board and the Local School Boards have attended Safeguarding and Child protection (including online safety) training as part of their induction.
- Ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare
- Ensure there is an annually updated effective safeguarding policy which is in accordance with government guidance and Lewisham Safeguarding Children Board safeguarding arrangements put in place with the three safeguarding partners. They must ensure the policy is available via the school websites or other means.
- Ensure the Staff *Code of Conduct* and Staff *Acceptable Use* policies are kept updated by the Group.
- Ensure there are appropriate policies and procedures in place to respond to children who are absent or go missing from education including having at least two emergency contacts for each child.
- Ensure the Group's schools have appropriate cyber security systems in place.
- Review (at least once every academic year) filtering and monitoring procedures in the group's schools
- Ensure the group's schools have a restrictive interventions policy.

3.3 The Designated Safeguarding Lead (DSL)
As stated in *Keeping Children Safe in Education*, the each school will appoint a DSL who is expected to:

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them
- Refer cases of suspected abuse to the local authority children's social care as required (which may be devolved to another member of the safeguarding team)
- Support staff who make referrals to local authority children's social care

- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Refer cases where a crime may have been committed to the Police as required
- Act as a point of contact with the three safeguarding partners in line with Working Together to Safeguard Children
- Liaise with the Head of the school to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- As required, liaise with the "case manager" and the designated officer (LADO) at the local authority for child protection concerns in cases which concern a staff member
- Liaise with staff and leadership teams in matters of safety and safeguarding (including online and digital safety), including promoting educational outcomes by sharing information about safeguarding, welfare and child protection issues
- Act as a source of support, advice and expertise for all staff, raising awareness of safeguarding and child protection amongst staff and parents / carers.
- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff
- Be alert to the specific needs of children in need, those with special educational needs and young carers
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation including that these allow information to be shared, without consent if necessary, for the purpose of keeping children safe
- Understand the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners.
- Ensure detailed, accurate, secure written records of concerns and referrals
- Understand and support the school with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalization
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Be able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses
- Ensure the school's child protection policies are known, understood and used appropriately

- Ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Group Board regarding this
- Ensure the child protection policy is available publicly and parents / carers are aware of the fact that referrals about suspected abuse, neglect or exploitation may be made and the role of the school in this
- Deliver annual staff safeguarding training according to the needs of the team and/or in response to current practices.
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- Ensure children leaving the school have their child protection file securely transferred to the new school or college as soon as possible as well as any other appropriate information necessary to safeguard the child in their new setting
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff
- Be available during school hours to discuss safeguarding concerns with staff and make adequate and appropriate cover arrangements in their absence. This includes the use of a shared mailbox detailed in part B of this policy.
- Act as the designated teacher for children who have a social worker (or devolve as appropriate to another member of the safeguarding team), including liaising with the relevant virtual school headteacher.
- Ensure there are appropriate policies and procedures in place to respond to children who are absent or go missing from education including having at least two emergency contacts for each child.
- Work with others to review filtering and monitoring procedures in the school, in conjunction with IT Services and the Group Board Safeguarding Link, including providing training to staff about their responsibilities.
- Lead on Family Help assessments as required.

3.4 Staff

Staff are responsible for the provision of pastoral care in the school. Staff will:

- Implement the framework outlined in this policy, including specific roles for tutors and teachers
- Read and understand at least Part 1 of Keeping Children Safe in Education in full and review at least annually.
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and the wider safeguarding team, the behaviour policy, the online safety policy (includes the expectations, applicable roles and responsibilities in

relation to filtering and monitoring) and the safeguarding response to children who go missing from education/who are absent from education.
- Be aware of the school's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
- Drug taking and/or alcohol misuse
- Unexplainable and/or persistent absences from education
- Serious violence, criminal exploitation (including that linked to county lines), radicalisation
- Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

3.4 Students and parents/carers

Students and parents/carers are responsible for communicating effectively with the school regarding any support that may be required.

Use My School Portal to keep to date with communications from the school.

4. Safeguarding and child protection framework

4.1 Purpose and Aims

All pupils at the Group schools are entitled to fulfil their optimum potential and be kept safe and healthy, regardless of age, ability, sex, gender, religion, or sexual identity.

This policy and its related documents aim to:

- Ensure all staff are aware that it is their responsibility to play an active role in ensuring the safety of all the children in the school and to follow the school's safeguarding policies and procedures.
- Ensure all staff are aware of their duty to report concerns to the appropriate Designated Safeguarding Lead (DSL) or, if appropriate, directly to the appropriate local authority children's social care team.
- Provide clear direction to all staff and others about expected actions in dealing with safeguarding issues, including those related to online safety, in accordance with internal and local authority children's social care procedures.
- Ensure that safeguarding concerns are identified early so that informed prompt action can be taken.
- Ensure that referrals are handled sensitively, professionally and in ways that support the needs of the child.
- Identify which children may be particularly vulnerable.
- Ensure that parents/carers are aware of our policies and procedures.
- Make clear our commitment to the development of sound procedures and good practice, including in record-keeping.
- Make clear our commitment to working with local authority children's social care, Clinical Commissioning Groups, and police as appropriate to safeguard children.
- Give priority to the interests of pupils over those of the institution.
- Ensure that listening to children is a cornerstone of practice.

4.2 Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's mental or physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe
- and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Children include everyone under the age of 18.

The following 3 safeguarding partners are identified in *Keeping Children Safe in Education* . They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

4.3 Equality Statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are LGBT. The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT (or are perceived to be) can be targeted by other children. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. We endeavour to reduce the additional barriers faced by proving a safe space for them to speak to a staff or student LGBT lead.

The Group recognises that 'Adultification bias is a form of racial prejudice where children of minority groups, typically Black children, are treated by adults as being more mature than they actually are. Actions committed by these children that would be deemed normal for child development are more likely to be treated as opportunities for discipline and children are more likely to be seen as having malicious intentions. A clear example of this bias in action is when a Black child is assumed to be older than their actual age. These perceptions could in turn perpetuate the maturity of Black children and the assumptions of adults can lead to these students experiencing harm and can lead to Black children are not receiving the safeguarding responses they need.

This can inadvertently send a clear message in terms of worth and value to children as to who is and is not perceived as worthy of support. This can then impact on how Black children view themselves and what they then identify and understand to be harmful. Ultimately, this type of

behaviour normalises harm and feeds into the narrative that Black people can withstand any form of abuse.'

5. Confidentiality and information sharing

Timely information-sharing is essential to effective safeguarding. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

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

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved

- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners guidance includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Where a child leaves the school, the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving.
- For pupils transferring schools who have previously carried, threatened with or used a knife or other weapon, a weapon risk assessment, including a safety and support plan would be implemented prior to them joining the school.

In line with KCSIE 2026, the school recognises that cyber security is part of its safeguarding responsibilities. The Group Board, School Boards and school leaders will take reasonable measures to protect personal information, in line with the Cyber Security Standards for Schools and Colleges, so that a cyber-incident, data breach or system failure does not compromise the safety of pupils or the school's ability to monitor and respond to safeguarding concerns.

6. Identifying abuse and recognising particularly vulnerable children

All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for early help.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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

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

We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online. It should be remembered 'that sometimes

children will 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. This should not prevent staff from having a professional curiosity and speaking to the DSL about any concerns.

The safety of pupils in our Group schools is paramount. The school takes a zero-tolerance approach to any form of abuse and takes steps to help staff understand that abuse can be present in any institution at any time.

All staff should be aware of the types and indicators of abuse so that they can identify children who may be in need of help. Known or suspected abuse will be handled sensitively but immediately and with due care. The school educates staff in how to identify signs of abuse and exploitation as well as ensuring awareness of historical abuse indicated by a child.

Staff should share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered that sometimes children will 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.

The Group understands the importance of contextual safeguarding and ensures the safeguarding team consider community risks and issues that may impact on the safety and vulnerability of children in its care as well as wider environmental factors in a child's life that may be a threat to their safety and/or welfare. The forms of abuse listed below may occur in both intra and extra-familial contexts.

All staff are 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. School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy and making a report on CPOMS.

Abuse, neglect, and exploitation are all forms of maltreatment that can severely impact a child's well-being. Abuse involves actively causing harm, such as hitting a child, while neglect refers to failing to protect a child from harm, such as leaving a small child home alone or placing dangerous objects like knives or matches within reach of an unattended toddler. Exploitation, another serious form of maltreatment, involves taking advantage of a child for personal gain, which can include forcing them into labour, engaging them in illegal activities, or subjecting them to sexual abuse. Each of these forms of maltreatment can have devastating effects on a child's physical, emotional, and psychological health.

Abuse takes many forms, and children experiencing abuse or harm don't necessarily behave in set ways. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. However, abused children may display some of the following behaviours.

- Withdrawn
- Suddenly behaves differently
- Anxious, afraid or showing unexplained fear
- Clingy
- Depressed
- Aggressive
- Problems sleeping
- Eating disorders
- Wets the bed
- Soils clothes
- Takes risk
- Misses school
- Changes in eating habits
- Obsessive behaviour
- Nightmares
- Drug misuse
- Alcohol misuse
- Self-harm
- Thoughts about suicide
- Risky sexual behaviour
- Unexplained increase in social media activity, especially at odd hours
- Presence of older boyfriend/girlfriend or adult friend
- Evidence of expensive gifts, money or possessions without clear explanation
- Changes in school performance
- Extreme secrecy or privacy, particularly regarding online activities
- Low self-esteem or self-worth

6.1 Physical Abuse

Physical abuse is when someone hurts or harms a child or young person on purpose. It includes violent acts such as hitting with hands or objects, slapping, kicking, shaking, poisoning, burning and drowning. It's important to remember that physical abuse is any way of intentionally causing physical harm to a child or young person. It also includes making up the symptoms of an illness or causing a child to become unwell.

6.1.1 Signs of physical abuse

Physical abuse can be indicated by:

- Bruises
- Broken or fractured bones
- Burns or scalds
- Bite marks.
- Scarring
- The effects of poisoning, such as vomiting, drowsiness or seizures
- Breathing problems from drowning, suffocation or poisoning.

6.2 Emotional Abuse

Emotional abuse is any type of abuse that involves the continual emotional mistreatment of a child. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child.
Emotional abuse is often a part of other kinds of abuse, which means it can be difficult to spot the signs or tell the difference, though it can also happen on its own.

Emotional abuse can include humiliating, ignoring, threatening or shouting at a child. It can also involve trying to control their lives, not allowing them to have friends or never saying anything kind, expressing positive feelings or congratulating a child on successes.

It could include verbal abuse such as criticism, belittling, or name-calling.

6.2.1 Signs of emotional abuse

There might not be any obvious physical signs of emotional abuse, neglect or exploitation. As children grow up, their emotions change. This means it can be difficult to tell if they're being emotionally abused. But children who are being emotionally abused might:

- Seem unconfident or lack self-assurance
- Struggle to control their emotions
- Have difficulty making or maintaining relationships
- Act in a way that's inappropriate for their age.

Young children might:

- Be overly affectionate to strangers or people they don't know well
- Seem unconfident, wary or anxious
- Not have a close relationship or bond with their parent
- Be aggressive or cruel towards other children or animals.

Older children might:

- Use language you wouldn't expect them to know for their age
- Act in a way or know about things you wouldn't expect them to know for their age
- Struggle to control their emotions
- Have extreme outbursts
- Seem isolated from their parents
- Lack social skills
- Have few or no friends.

6.3 Sexual Abuse

When a child or young person is sexually abused, they're forced or tricked into sexual activities. Sexual abuse can happen anywhere - and it can happen in person or online. Children are more likely to know their abuser than not.

Under-13s can never legally consent to sexual activity.

There are two types of sexual abuse - contact and non-contact abuse.
Contact abuse is where an abuser makes physical contact with a child. This includes:

- Sexual touching of any part of a child's body, whether they're clothed or not
- Using a body part or object to rape or penetrate a child
- Forcing, causing or enticing a child to take part in sexual activities including touching, kissing and non-penetrative sexual acts
- Making a child undress or touch someone else.

Non-contact abuse is where a child is abused without being touched by the abuser. This can be in person or online and includes:

- Exposing a child to sexual acts whether in person or online (including showing pornography)
- Forcing, causing or enticing a child to make, view or share child abuse images or videos
- Making, viewing or distributing child abuse images or videos
- Forcing, causing or enticing a child to take part in sexual activities or conversations online or through a smartphone.

6.3.1 Signs of sexual abuse

Children who are sexually abused may show the following:

- Avoiding being alone with or frightened of people or a person they know.
- Language or sexual behaviour you wouldn't expect them to know.
- Having nightmares or bed-wetting.
- Alcohol or drug misuse.
- Self-harm.
- Changes in eating habits or developing an eating problem.
- Physical symptoms such as bruises, bleeding, discharge, pains or soreness in their genital or anal area, sexually transmitted infections or pregnancy.

6.4 Neglect

Neglect is the ongoing failure to meet a child's basic needs and the most common form of child abuse. This can put children and young people in danger. And it can also have long term effects on their physical and mental wellbeing.

There are 4 types of neglect.

- **Physical neglect** is failing to meet a child's basic needs, such as food, clothing or shelter, and/or failing to ensure a child is properly supervised or kept safe.
- **Educational neglect** is failing to ensure a child is given an education.
- **Emotional neglect** is failing to give a child the nurture and stimulation they need. This could be through ignoring, humiliating, intimidating or isolating them.
- **Medical neglect** is failing to provide proper health care. This includes dental care and refusing or ignoring medical recommendations.

6.4.1 Signs of neglect

Children who are being neglected may show the following:

- Being smelly or dirty
- Being hungry or not given money for food
- Having unwashed clothes or inappropriate clothing for the weather
- anaemia
- Body issues, such as poor muscle tone or prominent joints
- Medical or dental issues
- Missed medical appointments, such as for vaccinations
- Not given the correct medicines
- Poor language or social skills
- Regular illness, infections or skin issues
- Repeated accidental injuries, often caused by lack of supervision
- Thin or swollen tummy
- Tiredness
- Untreated injuries
- Weight or growth issues.
- Living in an unsuitable home environment, such as having no heating
- Being left alone for a long time
- Taking on the role of carer for other family members.
- Becoming clingy
- Becoming aggressive
- Being withdrawn, depressed or anxious
- Changes in eating habits
- Displaying obsessive behaviour
- Finding it hard to concentrate or take part in activities
- Missing school
- Showing signs of self-harm
- Using drugs or alcohol

6.5 Domestic Abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- Physical or sexual abuse;
- Violent or threatening behaviour;
- Controlling or coercive behaviour;
- Economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- Psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

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

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

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

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

6.6 Exploitation

Child exploitation encompasses various forms of abuse and maltreatment, including sexual exploitation, forced labour, trafficking, modern slavery and the use of children in illicit activities such as drug trafficking (County Lines). It also involves the manipulation or coercion of children into performing activities that are harmful to their physical, mental, or emotional development.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

6.7 Vulnerable Groups

6.7.1 SEND

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

We offer extra pastoral support for these pupils via their form tutors, the SEND team and wider pastoral teams.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO. The school consider extra pastoral support and attention for these children, and ensure any appropriate support for communication is in place.

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

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

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

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

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

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

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

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

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

Our DSLs are appropriately trained, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

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

Any concerns should be reported to the DSL.

6.7.7. Pupils who are questioning their gender

Supporting pupils who are questioning their gender

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

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment,

and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.
A member of the safeguarding team will lead in these cases.

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

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

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

Considering requests for support with social transition
The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

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

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

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered

- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition
- The school will ensure that the decision-making process is documented and records are kept.
- The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

Rules on single-sex spaces
Pupils are not allowed into toilets, changing rooms or showers designated for the opposite biological sex, with no exceptions.

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

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

7 Child-on-child abuse, including harassment and violence

Child-on-child abuse includes but is not limited to:

- Bullying including cyber-bullying
- Physical abuse such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm
- Sexual violence such as rape, assault by penetration and sexual assault (including grabbing other children's body parts without their consent).
- Sexual harassment such as sexual comments, remarks, jokes, flicking bras or otherwise interfering with clothes, brushing against someone and online sexual harassment such as coercion, sharing of unwanted explicit content and sexual messages online.
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI
- Initiation/hazing type violence and rituals.
- Discrimination, including racism and faith-targeted abuse.

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

Behaviour which is not abusive at first may become abusive quickly or over time. Statistically girls and young women are more likely to be abused by their peers and boys and young men are more likely to be identified as abusers. This can be driven by wider societal factors such as everyday sexist stereotypes. Pupils with SEND, certain health conditions or pupils with certain characteristics such as sexual orientation, ethnicity, race or religious beliefs can also be at higher risk of suffering child on child abuse including peer group isolation and prejudice-based bullying. Pupils with SEND may also be disproportionately impacted by bullying without showing signs and may face barriers to reporting these challenges. The SENDCO or Learning Support Coordinators will always be involved when there is a child-on-child abuse concern about a child on the SEND register. Despite this, the school recognises that pupils of any age or sex are potentially at risk from child-on-child abuse and therefore all adults working for the school must take allegations of child-on-child abuse seriously and be vigilant in reporting such abuse in accordance with the procedures below.

Children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. Child on child abuse must always be recognised as a form of abuse and should never be dismissed as banter or an inevitable part of growing up. It can have a lifelong impact and so must be dealt with seriously.

The school recognises that children's sexual behaviour exists on a continuum from developmentally expected, to inappropriate, problematic or violent. Harmful sexual behaviour (HSB) can occur online or face-to-face and will usually be automatically considered harmful if there is a power differential between the two children such as an age gap of over two years or a developmental difference. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

The school recognises that the racism and faith-related discrimination can significantly affect a child's wellbeing, welfare and sense of safety. Victims of such discrimination are given additional pastoral support with the school.

The school aims to prevent child on child abuse by dealing with the risks proactively, not just reactively, adhering to the DfE guidance in KCSIE. All pupils are spoken to in assembly by the DSL or DDSL, with further work undertaken by Form Teachers and Tutors so that they understand the different forms of child-on-child abuse and how to report it in school. Annual specialist workshops on sex and relationships education and on online behaviour, referring specifically to sharing nudes and semi-nudes, are provided by external specialists and/or school staff to both pupils and parents /carers. This includes education on the 4Cs: Content, Contact, Conduct and Commerce

Positive values, including equality and respect for diversity are promoted through our PSHEE programmes in order to minimise the risks of child-on-child abuse for vulnerable groups.

Gender roles, stereotyping, prejudice, healthy relationships are among other relevant topics covered in these programmes.

The group recognises the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment. We will Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes. Staff are training to recognise that exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL.

The school focuses on providing a safe atmosphere and culture in which pupils feel able to share their concerns openly and have them listened to. Derogatory or sexualised language or behaviour is not acceptable and will be challenged. Racism and other prejudicial behaviour is not acceptable and the school promotes an inclusive, anti-discrimination culture. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

In addition, the school provides students, parents / carers and staff with training and current advice relating to the possession and sharing of nude or semi-nude images of children and young people, and coercion to produce such images. Procedures are in place for dealing with incidents involving such incidents, based on the advice by the UK Council for Internet Safety (see appendix *Sending Nudes and Semi Nudes* and the *IT Policy*). All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response.

The school recognises that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place both inside and outside of school and is simply not being reported.

8. Honour-based abuse, including FGM and forced marriage

Honour based abuse is the internationally recognised term describing cultural justifications for violence and abuse. The Association of Chief Police Officers (ACPO) defines honour-based abuse as 'A crime or incident, which has or may have been committed, to protect or defend the honour of the family and/or community'. This may include Female Genital Mutilation and/or Forced Marriage.

Honour based abuse is a domestic abuse issue, a child abuse concern and a crime. If any child is suspected to have been victim of, or at risk of harm from honour-based abuse, the DSL must

be notified immediately, and this information will be passed on to the appropriate Safeguarding Children Board for the child in question.

8.1 Female Genital Mutilation
Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. The disclosure of FGM should be reported directly to the police as well as to the DSL.

- FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.
- Risk factors for FGM include:
- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman
- Many girls suffer health problems for the rest of their lives after the operation, including but not limited to urinary, menstrual, stomach and mental health problems.
- Call the 24 hour helpline 0800 028 3550 if you are worried a child is at risk of FGM.
- There is a legal duty that requires any teacher, who is informed by a girl under 18 that an act of FGM has been carried out on her, to make a report to the police by calling 101, the single non-emergency number. Where there is a risk to life or likelihood of serious immediate harm, teachers should report the case immediately to police, including dialling 999 if appropriate.
- In most cases reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day.

For more details see: Mandatory reporting of female genital mutilation: procedural information (accessible version) - GOV.UK

8.2 Legal Age for Marriage
The Marriage and Civil Partnership (Minimum Age) Act 2022 came into force in February 2023 means that 16- and 17-year-olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. Any concerns that students may be getting married should be referred to the DSL.

8.3 Forced Marriage
A forced marriage is a marriage in which one or both spouses do not consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure. There is a clear distinction between an arranged marriage and a forced marriage. An arranged marriage is entered into freely by both parties, although their families take a leading role in the choice of the partner. Forced marriage is a form of abuse and should be treated as such. Any child at risk of being entered into a forced marriage should be reported to the DSL, and this information will be passed along to the appropriate local authority children's social care service for that particular child.

9. Child sexual exploitation

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document *Child sexual exploitation: Definition and a guide for practitioners* (DfE 2017)
Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

- Having prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be

committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.
CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

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

10. Child criminal exploitation

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. This may constitute modern slavery. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".' Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.
If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

11. Prevent and risks of radicalisation

The Group and its schools are committed to upholding its legal responsibility under the Counter-Terrorism and Security Act (July 2015) to 'have a due regard, in the exercise of our functions, to prevent people from being drawn into terrorism.' Staff must be aware of the risks posed by online activity of extremist and terrorist groups and their responsibility to identify individual children who may be at risk of radicalisation or being drawn into terrorism/extremist activity (more detailed information is found in related document *Prevent*).

The London borough of Lewisham has been identified in the Government's Prevent Strategy as one of the priority local areas for action. This borough-wide initiative between Lewisham, the Police and other key agencies and communities aims to deter extremist groups and support vulnerable people.

Prevent is part of the national counter-terrorism strategy and aims to stop people being drawn into or supporting terrorism. The strategy focuses on three key areas which are:

- Respond to the ideological challenge of terrorism and the threat from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- Work with sectors and institutions where there are risks of radicalisation that we need to address
-

Possible signs of radicalisation may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, artwork or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others

Our schools have internet filtering in place to protect children from exposure to extremist material on the internet.

Promotion of fundamental British values and the school values is incorporated into the curriculum, particularly in PSHEE lessons which provide a safe environment to debate controversial issues and help build pupils' resilience to radicalisation. This supports pupils to make a positive contribution to the development of a fair, just and civil society.

The suspicion / disclosure of potential involvement in terrorism or the identification of anybody who is susceptible or vulnerable should be reported to the DSL (or directly to the Lewisham Prevent Programme at 07710 387 930 or who will advise on referrals to Channel if required). The referral should be made to the borough in which the child lives, so alternative Prevent contact details may be required. You can also speak to local police in person/via 101 or call the DfE helpline on 020 7340 7264. Staff should use their judgement to identify children at risk and act proportionately.

12. Visitors, including speakers

Appropriate arrangements need to be in place for the supervision of external visitors or speakers who will be coming into contact with pupils. This guidance is outlined in full in our *Visitors Policy*. Visitors to the school will be issued with safeguarding guidance (*Safeguarding Brochure*) as a matter of routine.

It is the responsibility of all staff to ensure that no visitor has unsupervised access to pupils at any time and to monitor the content of any presentation. Pupils are not allowed to invite guests on site, and all invitations must be overseen by a member of the teaching staff.

As part of their general safeguarding responsibilities and the Prevent duty, staff should refer to the *Visitors Policy* which contains further information on how to ensure visiting speakers are vetted for links with extremism.

13. Harmful sexual behaviour, sexual violence and sexual harassment between children

The Group's schools' response to reports of child-on-child sexual violence and sexual harassment will be decided on a case-by-case basis with the designated safeguarding lead (DSL) taking a lead role, supported by other agencies as required.
Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents

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

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

If a report of sexual abuse, violence or assault is being made, particular care should be taken to ensure an appropriate environment is chosen to receive the report and that at least two members of staff are present, respecting the wishes of the pupil as to the sex/gender of these staff where possible.

All reports of child-on-child abuse will be responded to immediately. All staff are trained to manage a report/disclosure of child-on-child abuse. Staff are to ensure that where images or videos of a sexual nature are involved, they follow the procedures outlined in the Appendix 7 *Sending Nudes and Semi Nudes* and **do not** view or forward illegal images of a child.

Where there has been a report of sexual violence, the DSL (or member of the safeguarding team) will make an immediate risk and needs assessment considering:

- The victim, especially their protection and support
- The alleged perpetrator
- All other children at the school, especially any actions that are appropriate to protect them.

Reports of sexual violence or sexual harassment should also include the time and location of the incident. Subsequent risk assessments will include any actions required to make the location safer.

The DSL will engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it's likely that professional risk assessments by social workers or sexual violence specialists will be required. The DSL will use these risk assessments to inform the school's approach to responding to the report and will inform our own risk and needs assessments. Guidance on risk assessments is found in *Keeping Children Safe in Education* part 5 and in the Policy *Sexual Violence and Sexual Harassment between Children*.

The DSL is likely to be the most appropriate person to advise on the school's response to a report of child-on-child abuse. How the DSL manages the report, including when to inform the alleged perpetrator, will depend on a number of important considerations, which are outlined in *Keeping Children Safe in Education part* 5 and in the Policy *Sexual Violence and Sexual Harassment between Children*. Where a report is going to be made to children's social care and/or the police, as a general rule the DSL should speak to the relevant agency to discuss next steps and how the alleged perpetrator will be informed.

There are 4 likely scenarios that the DSL should consider when managing reports:

- Some reports should be managed internally, where early help or statutory interventions are not required.
- Some reports should be managed through providing early help (as outlined in chapter 1 of Working Together to Safeguard Children), where statutory interventions are not required.
- Some reports should be referred to children's social care, where a child has been harmed, is at risk of suffering significant harm, or is in immediate danger.
- Some reports should be referred to the police (usually in parallel with a referral to children's social care), where a report of rape, assault by penetration or sexual assault is made.

Where scenarios involve working with children's social care, the school should not wait for the outcome of an investigation before protecting the victim and other children. The DSL should work closely with children's social care to ensure the school's actions do not jeopardise a statutory investigation, however, immediate consideration must be given to safeguarding the victim, alleged perpetrator and all other children. Further advice on managing reports is found in *Keeping Children Safe in Education part* 5 and in the Policy *Sexual Violence and Sexual Harassment between Children*.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it under certain UK GDPR law. Advice should be sought from the DSL who will consider the following:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority's children's social care
- Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

13.1 Ongoing response
The victim:

The nature of how the school supports the victim will depend on:
- The age and developmental stage of the victim, the nature of the allegations and the potential risk of further abuse

- The needs and wishes of the victim

Often, victims may not disclose the whole picture of abuse immediately, so dialogue should be kept open and encouraged. It is also important to understand intra-familial harms and identify any necessary support for siblings following incidents of sexual violence or sexual harassment. Further guidance on supporting victims is found in *Keeping Children Safe in Education* part 5 and in the Policy *Sexual Violence and Sexual Harassment between Children*.

The alleged perpetrator:
It can be difficult to balance the need to safeguard the victim (and other children) by providing the alleged perpetrator with an education and safeguarding and implementing disciplinary sanctions. The DSL should provide support (and sanctions as appropriate) on a case-by-case basis, considering:

- The age and developmental stage of the alleged perpetrator
- The nature of the allegations and risk of harm to other children
- Any unmet needs that the alleged perpetrator may have.

Further guidance on supporting the alleged perpetrator is found in *Keeping Children Safe in Education part* 5 and in the Policy *Sexual Violence and Sexual Harassment between Children*.

As a matter of effective safeguarding practice, schools should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

14. Serious violence

Serious violence is a continuing safeguarding concern which may involve:

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

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

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

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).
If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

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

15. Physical and mental health

The Group and its schools recognise that promoting good physical and mental health for pupils is a priority and is committed to ensuring that physical and mental health and wellbeing of pupils is promoted.

We recognise that staff can play an important role in preventing self-harm and also in supporting pupils, peers and parents /carers of pupils who self-harm or are recovering from self-harm (see Appendix *Self-Harm*).

Staff can play an important role in preventing eating disorders and also in supporting pupils, peers and parents /carers of pupils currently suffering from or recovering from eating disorders (see pastoral care policy appendix *Eating Disorders*).

All staff should 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. Further information on the link between mental health and safeguarding, along with signposts for guidance and support can be found in paragraphs *Keeping Children Safe in Education* .

School staff are not expected or trained to diagnose mental health conditions or issues (this should only ever be done by a trained professional), but may notice behaviours that may be of concern, such as:

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by referring on CPOMS or speaking to a member of their safeguarding team. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person. If you have a mental health concern that is **not** also a safeguarding concern, speak to the Head of Year or relevant member of staff to agree a course of action.

16. Safeguarding continued professional learning

All Governance volunteers and all staff are supplied with the summary statutory guidance from *Keeping Children Safe in Education* and a central record is kept that this information has been received, read and understood.

All Governance volunteers, staff and other volunteers are supplied with copies of the safeguarding and child protection policy, undergo mandatory annual safeguarding training in accordance with the London Safeguarding Children Procedures and receive regular reminders and bulletins about the procedures in place to ensure that they can assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective. This training is regularly updated. A formal record is kept on the issuing of guidelines and individual training received. Annual safeguarding training includes:

- The safeguarding and child protection policy, including the Prevent duty
- The expected pupil behaviour policy and behaviour management procedures
- The employee code of conduct
- The BYOD, staff acceptable use policy and guidance for community members on the use of social media
- The Whistleblowing (Speaking up') policy
- Part 1 of KCSIE

The DSL, Deputy DSLs and other members of the safeguarding team undertake full refresher training at least every two years and the DSL attends regular network meetings as well as keeping up to date with weekly and monthly local and national safeguarding bulletins and attends Lewisham Prevent training.

Through the regular training programme outlined above, the school ensures that a culture of continued learning and development relating to safeguarding is promoted, with staff given ongoing opportunities to ask questions, raise concerns and review their own practice.

17. Safer recruitment

St. Dunstan's Education Group is committed to safer recruitment in education and the Group's recruitment policy and procedures (see policy *Safer Recruitment and Safeguarding Questions*) will ensure pupil safeguarding remains an absolute priority when appointing staff.
All new members of staff and new governance volunteers receive safeguarding induction as soon as possible after start date, and certainly before they have unsupervised access to children. Induction training also includes training on the *Employee Code of Conduct*, *Safeguarding and Child Protection Policy*, *Expected Pupil Behaviour Policy* and the identity and the role of the DSL.

All staff must obtain assurance that any staff employed by another organisation and/or working with the pupils on another site (for example, in a separate institution) that appropriate safeguarding checks and procedures are undertaken in accordance with the school policy.

18. Staff Code of Conduct

All Staff have the responsibility to behave appropriately and report concerns regarding colleagues in accordance with the *Safeguarding and Child Protection Policy* and *Whistleblowing Policy*.

Further information on expected staff behaviour is found in the *Employee Code of Conduct* and *Staff Guidance on Interaction with Pupils*.

Staff who are involved in performing arts, sports provision and other activities that could potentially involve close one to one teaching should pay particular reference to *Staff Guidance on Interaction with Pupils*, which has detailed instructions on the safeguarding arrangements in place for these children.

All staff working in EYFS, visiting EYFS or working with EYFS must read and understand the *EYFS Mobile Phones Policy*. Staff should never use phones in EYFS settings or around EYFS children, unless there is an emergency and no other way to call for help.
The Group Safeguarding Link Trustee will meet at least termly with the Group DSL to review safeguarding practice and procedures.

This policy and its implementation will be reviewed by the Group Board annually. The Group Board should consider whether the procedures are satisfactory and being properly enacted. The implementation of the policy will be checked, monitored, reviewed and evaluated. The Group Board overview will consider any trends and patterns identified during the year. Their conclusions should be clearly minuted.

19. Online safety, filtering and monitoring

Our schools are phone-free by default.

Pupils are given clear guidelines on the use of mobile phones and are taught how to keep themselves safe online (including the dangers of cyber-bullying, keeping personal data safe

and the dangers of sending nudes). This information is presented in an age-appropriate way. This includes how to recognise when they are at risk and ask for help, for example if they are being blackmailed online. In delivering this programme, the school refers to the resources of the UK Safer Internet Centre and CEOP's Thinkuknow website to ensure the most up to date resources are used. Further details on our approach to online safety can be found in the Digital Safeguarding and Online Safety Policy.

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

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

Many children have unlimited and unrestricted access to the internet via mobile phone networks. This access means some children, whilst at school, could sexually harass their peers via their mobile and smart technology, share nude or semi-nude: consensually and non-consensually (often via large chat groups), view and create AI generated intimate images, and view and share pornography and other harmful content. To mitigate against these risks, pupils are educated about these risks and pupils and staff are expected to sign an Acceptable Use agreement to ensure the school ICT systems, internet and mobile data whilst in school are used appropriately.

Pupils and parents / carers receive annual education on the most up to date online safety risks from a member of the UK safer internet centre.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will consider referring into the Cyber Choices programme

The Group's schools have internet filtering in place to protect children from exposure to extremist material on the internet. Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Our monitoring includes physical monitoring, the use of LAN school, monitoring internet searches and school-issued individual devices. We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures; presently this only applies to the Sixth Form.

Each year our DSL, along with IT Services and a Group Board member, review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed. All our staff undertake training during the August - September INSET to understand the risks of poor filtering and monitoring and know how to share their concerns. They also receive annual cybersecurity training.

20. Remote teaching and learning

The below guidance applies when individual pupils or cohorts are involved in remote teaching and learning. Remote teaching and learning is no longer offered due to the effects of COVID-19 but the below guidance stands in place, should the physical school site need to close due to unforeseen events, or should remote teaching and learning need to be put in place for any other reasons.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads know who our vulnerable pupils are and have the discretion to offer a place to those who are at the threshold of receiving support from local authority children's social care. The lead contact for liaison with Children's Services is the DSL.

Pastoral staff at the school, including Heads of Year and members of the Individual Pupil Needs team, will make contact with vulnerable pupils and/or their parents /carers on a regular basis to check on their safety and wellbeing and record a summary of this conversation on CPOMS. We also continue to work with local authority children's social care for children on a Child Protection or Child in Need plan.

Any urgent safeguarding concerns will be escalated immediately in liaison with our three safeguarding partners.

Pupils and parents/ carers are subject to our Digital Safeguarding and Online safety policy which details the expectations of pupils and parents/ carers during remote online learning, including appropriate online behaviour and having suitable clothing and backgrounds.

Staff have received updated safeguarding training relating to safe online learning. In the event of remote teaching, all live classes and Teams have at least two teachers invited and classes are recorded and the video backed up so that footage can be reviewed if there are any concerns.

Child-on-child abuse during remote learning will continue to be dealt with according to our Safeguarding and Child Protection Policy and in accordance with the principles laid out in *Keeping Children Safe in Education*, in the event of remote teaching.

The impacts of lockdown and remote learning on the mental health and wellbeing of children are not to be underestimated and the school will take steps to monitor the wellbeing and mental health of pupils and respond appropriately.

In the event of remote teaching, for all pupils in the school a daily tutorial will take place where the Form Tutor or Form Teacher will be able to monitor the wellbeing of members of their tutor group. The school will regularly signpost support available for mental health and wellbeing both in school and through external agencies and charities. Where there are concerns about a pupil's wellbeing or mental health, additional measures may include online meetings with a member of the pastoral team, communication with a child's parents or carers, remote counselling with the school counsellor. Where appropriate, the school may refer to external agencies, such as CAMHS.

21. Alternative provision

When our schools place a pupil in an alternative provision, we maintain responsibility for the safeguarding of that pupil. We will ensure that the placement meets the pupil's needs and that their safety and well-being are prioritised.

We recognise that pupils in Alternative Provisions often have complex needs and may be more vulnerable to harm.

Therefore, it is crucial for the Group Board to be aware of these additional risks. To support this, we adhere to ensuring that all placements are conducted with the highest standards of care and protection for our pupils.

The schools will obtain written confirmation from all alternative providers that appropriate safeguarding checks have been completed for all individuals working with pupils equivalent to those that schools would undertake for their own staff.

This includes a commitment from the provider to inform the school of any changes that could pose a risk to pupils, such as new staff appointments, so the school can be assured appropriate vetting has occurred. The school will also maintain accurate records of each child's placement, including the address of the AP or subcontracted provision being accessed.

To ensure ongoing safety and suitability, placements will be reviewed at least half-termly, with checks on attendance, safeguarding practices, and the child's overall wellbeing. Where safeguarding concerns arise, the placement will be immediately reviewed and terminated, if necessary, unless or until those concerns are satisfactorily resolved.

22. Children and the court system

Children may sometimes be required to provide evidence in criminal courts, whether as victims of crimes or as witnesses. We recognise the significant impact this can have on a child's emotional and psychological well-being, our school is committed to supporting children throughout this challenging process.

To assist children in understanding the court system, there are two specific guides available from the government on 'Going to court', which we would refer to:

Going to Court (5-11 year olds) - This guide explains the court process in simple terms, including the special measures available to support young children.

Going to Court and being a Witness (12-17 year olds) - This guide offers a more detailed explanation of the court process, appropriate for older children.

Both guides include diagrams illustrating the courtroom structure and explain the use of video links to help children understand what to expect.
When children are required to give evidence, our school will:

- Provide Emotional support: Offer counseling services and emotional support through our school's support staff.
- Provide Educational Support: Ensure that children understand the court process by discussing the age-appropriate guides in a safe and supportive environment.
- Coordinate with Families: Work closely with families to understand the child's needs and coordinate support strategies.

23. Monitoring

The Group Safeguarding Link Trustee will meet at least termly with the DSL to review safeguarding practice and procedures.

This policy and its implementation will be reviewed by the governors annually. The governors should consider whether the procedures are satisfactory and properly enacted. The implementation of the policy will be checked, monitored, reviewed and evaluated. The governors' overview will consider any trends and patterns identified during the year. Their conclusions should be clearly minuted.

At every substantive review, the policy will be approved by the SDEG Group Board.

24. Links with other policies

This Safeguarding policy links to the following policies:
- Expected Pupil Behaviour
- Anti-Bullying
- Curriculum
- Pupil Attendance
- Equal Opportunities Policy
- Data Protection/GDPR Policy
- Digital Safeguarding and Online safety
- Acceptable Use
- HR Staff Handbook including Employee Code of Conduct
- Speaking Up (Whistleblowing)
- Gender
- Safer Recruitment
- Visitors and Contractors
- Intimate Care
- AI

Part B - School-Specific Arrangements

25. St Dunstan's Group Safeguarding Essential Contacts

Safeguarding concerns or queries should be directed to (safeguarding@stdunstans.org.uk), in the first instance, to ensure the email is received regardless of staff absence.

Designated Safeguarding Lead (DSL)	St Dunstan's College (whole)including EYFS	Lucy Clewley, Deputy Head Pastoral	020 8516 7200 lclewley@stdunstans.org.uk
Deputy Designated Safeguarding Lead (DDSL)	Senior School	Eden Wood Head of Year 11	020 8516 7200 ewood@stdunstans.org.uk
Deputy Designated Safeguarding Lead (DDSL)	Junior School including EYFS	Ailsa Cameron, Junior School Deputy Head Pastoral Andrew Coley, Junior School Deputy Head Pastoral (Parental Leave)	020 8516 7225 acameron@stdunstans.org.uk 020 8516 7225 acoley@stdunstans.org.uk
Safeguarding Team Member	Senior School	Jade McLellan - Head of St Dunstan's College	020 8516 7200 jmclellan@stdunstans.org.uk
Safeguarding Team Member	Senior School	Emma Latham - Deputy Head Academic	020 8516 7200 elatham@stdunstans.org.uk
Safeguarding Team Member	Senior School	Alex Brewer – Head of Sixth Form	020 8516 7200 abrewer@stdunstans.org.uk
Safeguarding Team Member	Junior School including EYFS	Laura Whitwood - Head of Junior School	020 8516 7225 lwhitwood@stdunstans.org.uk
Safeguarding Team Member	Junior School	Andrea Rose - Head of EYFS	020 8516 7225 arose@stdunstans.org.uk
Safeguarding Team Member	Junior School	Michael Clifford - Head of Year 1 and 2	020 8516 7225 mclifford@stdunstans.org.uk
Safeguarding Team Member	Junior School	Hannah Stanton - Head of Year 3 and 4	020 8516 7225 hstanton@stdunstans.org.uk
Safeguarding Team Member	Junior School	Ben Chambers - Head of Year 5 and 6	020 8516 7225 bchambers@stdunstans.org.uk
Safeguarding Team Member	Junior School including EYFS	Alex Murphy - Junior School Deputy Head Academic	020 8516 7225 amurphy@stdunstans.org.uk
Group Designated Safeguarding Lead (DSL)	Group	Nick Hewlett - CEO	nhewlett@stdunstans.org.uk
Group Safeguarding link Trustee	Group	Lisa Walker	LWalker@stdunstans.org.uk

Lewisham LADO		Lovona Brown	020 8314 7280 LewishamLADO@lewisham.gov.uk
Lewisham Children's Safeguarding Partnership		www.safeguardinglewisham.org.uk/lscp	
Lewisham Safeguarding		mashagency@lewisham.gov.uk	020 8314 6660
Southwark Safeguarding		mash@southwark.gov.uk	MASH 020 7525 1921 (Mon-Fri 9am-5pm) 020 7525 5000 (out of hours)
Southwark Schools Safeguarding Coordinator	Apo ÇAĞIRICI	020 7525 2715/07946 453527 Apo.Cagirici@southwark.gov.uk	
Southwark Local Authority Designated Officer (LADO)	Eva Simcock	020 7525 0689	Eva.Simcock@southwark.gov.uk
Southwark Children Safeguarding Partnership		www.safeguarding.southwark.gov.uk	sscp@southwark.gov.uk
Bromley Safeguarding		MASH mash@bromley.gov.uk 020 8461 7373	MASH mash@bromley.gov.uk 020 8461 7373
Bromley Children Safeguarding Partnership		www.bromleysafeguarding.org	BSCP@bromley.gov.uk To contact the LADO: Telephone 020 8461 7669/020 8313 4325 Email:
Greenwich Safeguarding Children partnership			020 8921 4477 To contact the LADO: Telephone: 020 8921 3930 Email:

Those with specific responsibilities with respect to safeguarding (including but not limited to the Safeguarding Team) receive training to undertake their roles and also receive refresher training at least once every two years.

Although routinely the Designated Safeguarding Lead (DSL) or a member of the safeguarding team makes referrals to external support services, anyone can make a referral to the appropriate local authority children's social care team or other relevant safeguarding partner (referral should be to the services based in the borough in which the child resides). You can do this in the first instance of concern for a child, or you can refer to the local authority children's social care team or relevant safeguarding partner if you feel that the DSL has not acted appropriately in dealing with a concern you've passed on to the school. Safeguarding children

is everyone's responsibility. You can and should persist in seeking help for a child you believe to be at risk of harm.

If you think a child or young person may be in immediate danger, call 999. Otherwise contact the Lewisham Families First Contact Point (FFCP) on one of the numbers listed below. If your concern regards a child residing in another London borough, you can find safeguarding contacts for all 32 boroughs on the London Safeguarding Children Board website: Children's Safeguarding Contacts London | London SCP

Lewisham Families First Contact Point (FFCP) can be contacted on:

020 8314 6660 or 020 8314 6000 (out of hours) or via their email MashAgency@lewisham.gov.uk

The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe.

The school has positive working relationships with local safeguarding agencies and officials and interacts with statutory agencies to ensure the safety of pupils is supported effectively.

If you think a child or young person may be in immediate danger, call 999.

26. Children Who Are Absent From School

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children. We monitor attendance carefully through the ISAMS register and address poor or irregular attendance without delay. Further detail on escalation for Children Missing Education can be found in the Pupil Attendance Policy.

We will always follow up with parents/carers when pupils are not at school. St Dunstan's College requests that all parents/carers provide at least two emergency contact numbers for each pupil and encourages parents/carers to inform the school of any changes as soon as possible.

In response to the guidance in Keeping Children Safe in Education the school has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
- Leave school to be home educated

- Move away from the school's location
- Remain medically unfit beyond compulsory school age
- Are in custody for four months or more (and will not return to school afterwards); or
- Are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

St Dunstan's College is a relatively open site and thus it would be easy for a pupil to disregard school rules and leave the site without permission. If a pupil's non-presence in a lesson or activity suggests that this may have taken place, staff should:

- Inform the DSL and College Office.
- Checks will be undertaken to try and ascertain whether the pupil is on site. Locations to be considered include: Medical room, Music rooms, LRC, Toilets, Sports Fields.
- If pupils still cannot be located, DSL will agree next steps with additional members of the senior leadership team, which could include calling 999.

The safety and whereabouts of all Junior School pupils are closely monitored throughout the school day. If a pupil is unexpectedly absent from a lesson, activity or supervised session, and their whereabouts is unknown, staff will immediately inform the Junior School Office and a member of the Junior School Leadership Team.

Checks will be undertaken without delay to establish the pupil's location, including contacting relevant staff and searching appropriate areas of the school site, such as classrooms, specialist teaching areas, the Wellness Centre, toilets, playgrounds, sports facilities and other supervised locations. Checks of their individual timetables for sessions such as LAMDA or Music Lessons will be completed.

If the pupil cannot be located promptly, the Junior School Deputy Head Pastoral (DDSL) and the Head of Junior School will assess the situation and determine any further action required in conjunction with the DSL. Where there are concerns that a pupil may be at risk or has left the school site, parents/carers and appropriate external agencies, including the Police, may be contacted.

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities and that certain groups of children are more at risk of going missing including children at risk of harm/neglect.

St Dunstan's College will liaise with Lewisham local authority when the whereabouts of a child is unclear or unknown and agree joint next steps, in accordance with the guidance in *Children Missing Education* (September 2016). This includes routine notification for children leaving the school for example due to relocation, change to home education or permanent exclusion.

27. Early Years Foundation Stage
The school will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

Staff are not permitted to use personal mobile phones to take photographs or videos of any children in the Early Years Foundation Stage. All staff working in EYFS, visiting EYFS or working with EYFS must read and understand *the EYFS Mobile Phones Appendix*. Staff should never use phones in EYFS settings or around EYFS children, unless there is an emergency and no other way to call for help.

Full details of EYFS supervision arrangements and ratios can be found in related document *EYFS Supervision*.

28. Safeguarding International Students

All members of admissions and recruitment teams have a role to play in ensuring the safety, wellbeing and protection from exploitation of the children which the school sponsors.
We recognise that schools which have the ability to sponsor Child Student visa applications could be seen as soft targets for somebody trying to facilitate child trafficking into the UK, and that we all members of the admissions and recruitment teams have a responsibility to try to prevent this from happening and to report any suspected cases of this.

Children and families whose first language is not English may be particularly vulnerable to exploitation and extra care should be taken to ensure that parents understand what they are consenting to.

Sponsored and other international pupils in the UK without their parents/carers may be particularly vulnerable and may need additional support in terms of their safety and wellbeing. The pastoral team and the safeguarding team will lead in communication with host families, external agencies and families, via our dedicated International Pastoral Tutor, to ensure this happens.

29. Disclosures and Reporting Procedures – What to do if you have a concern

Members of staff may suspect a case of abuse from a variety of sources:

- A pupil discloses to them personally
- From behaviour of, or marks on, the pupil (e.g. bruises, welts, lacerations, abrasions, burns)
- Indications through schoolwork
- A pupil informs them that he/she knows or suspects that another pupil is being abused
- Another third party informs them that he/she knows or suspects that a pupil is being abused.

Any allegation against other adults including family members will be taken seriously. There are no thresholds of seriousness or credibility of any allegation. It is vital that all children feel listened to and taken seriously.

IF YOU BELIEVE A CHILD IS AT RISK OF IMMEDIATE HARM, YOU MUST CALL 999 BEFORE ANY OTHER ACTION IS TAKEN.

Safeguarding and Child Protection is *everybody's* responsibility, including staff, parents / carers and visitors, and pupils and anyone can make a referral to the appropriate Local Safeguarding Children Board if they believe a child is at risk of being harmed.

29.1 Staff

All staff have a duty to report any Safeguarding or Child Protection concerns without delay. There are a number of avenues of reporting concerns:

- All staff have access to CPOMS, the school's secure online safeguarding reporting system. Wherever possible, CPOMS should be used to log welfare, safeguarding or child protection concerns. These concerns are immediately sent to the DSL, or a nominated deputy in the absence of the DSL, who will act on them in accordance with Lewisham SCB procedures.
- This should also be followed up in person or via a phone call with the DSL, to ensure the message has been seen to be actioned.
- Any supporting documents, such as body maps or written notes from pupils should be signed and dated and handed in to the DSL. Body maps are available from the DSL and on CPOMS, these should be used to mark any injuries seen on a child.
- If for some reason a member of staff is unable to report their concern on CPOMS, they should report their concern in writing (either hard copy or email) to the DSL or Deputy DSL without delay.
- If there is no other avenue for reporting available at the time of an incident or disclosure, the staff member may report by phone to the DSL or Deputy DSL, who will make notes which will be shared with the reporting staff member for signing as soon as possible.

29.2 Parents and Visitors

Any parent / carer or other visitor to St Dunstan's College has a duty to report any safeguarding or child protection concerns. All visitors to the school are provided with a *Safeguarding Brochure*, which is also available at the College Office/Junior School Office. All parents / carers and other stakeholders will be made aware that there is an official procedure to be followed in any situation where a safeguarding concern is raised, and a copy of this process will be made available if they wish to read it. As outlined in this guidance, any adults with concerns about a child's safety during the course of their visit at St Dunstan's College must:

- Immediately inform the DSL
- Write careful notes about what they have heard, witnessed or have been told. Sign, time and date all notes.

29.3 Pupils
Pupils will be educated in assemblies about safeguarding procedures such that they can understand that they can approach any member of staff if they need help. Pupils also have a duty to report any Safeguarding or Child Protection concerns relating to fellow pupils. Pupils are provided with information on how to report their concerns through the PSHEE programmes, and guidance is also available on the school VLE. Any pupil with concerns about another child's safety at the school must:

- Immediately inform the DSL
- Write (or be supported to write depending on age) careful notes about what they have heard, witnessed or have been told. Sign, time and date all notes.

29.4 Pupil Concerns and Disclosures
If a child discloses to you that they are being harmed or abused:

- Reassure the pupil that she/he is right to tell and is not to blame
- Do not promise confidentiality. Explain that you have to make sure that the pupil is safe and may need to ask other adults to help you do this.
- Believe the child. It is important to say 'I believe you and I am going to help you'.
- Remain calm. Do not show shock, anger or disbelief.
- Remain non-judgemental. Do not ascribe feelings to the child, e.g. by saying something like 'you must be angry/sad/hurt'. Simply affirm the child's feelings as they are expressed. 'It's OK to feel that way'.
- Do not question the pupil. Let the pupil tell you what she or he wants to and no more. The pupil may have to disclose to a specialist later and too much detail now may interfere with later investigations.
- Listen carefully and repeat the pupil's words. When the pupil has finished, make sure that she/he feels secure and explain what you are going to do next.
- Consider the child's immediate safety, which could depend on the time they are speaking to you (for example, are they about to leave the school site at the end of the day?).
- Follow up by making arrangements with the pupil to speak to them later. They have chosen you as an adult they can trust.
- Report. Make notes, including the date and time of the pupil disclosure on CPOMS. It is important to record as much as you can remember using the pupil's own words. Write facts and information only, taking care to avoid opinion. It is crucial that your notes be made as soon as possible after the disclosure, and certainly on the same working day. If you are unable to use CPOMS to log your notes, you should write them and time, date and sign them before handing the original hardcopy to the DSL.
- Do not attempt any examination or remove any part of a pupil's clothing to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. The pupil should only be examined by an appropriate doctor.
- Do not investigate. No member of the school staff shall conduct an investigation concerning child abuse. This will be done by Children's Services and/or the Police.
- Do not discuss the report with the parent or anyone else involved in the care of the child, until the concerns have been reported in line with this policy and discussed with a member of the safeguarding team to agree next steps.

29.5 What Happens Next?
All cases of alleged or suspected abuse will be treated seriously. The DSL will follow the procedures set out in *Keeping Children Safe in Education.*

Normally, a co-ordination meeting between the DSL and the member of staff who has raised the concern is advised, and all matters disclosed will be treated in strictest confidence. During this meeting, consideration should be given to the provision of support for the child and for the member of staff who made the original report.

Any co-ordination meeting should also consider:

- Whether medical treatment or assessment is required
- Siblings and other members of the child's family
- Implications for other pupils
- The likely attitude of parents/carers
- Immediate welfare of child – e.g., how does he/she get home, fear of going home, etc.

The DSL will complete an assessment using the Common Assessment Framework or other assessment guidance provided by the local authority children's social care or local safeguarding partners, which will guide the decision of whether or not to refer the child to the local authority children's social care or local safeguarding partners for further action. In situations where a child has suffered or is likely to suffer significant harm, the DSL will seek advice from the local Multi-Agency Safeguarding Hub immediately and refer to children's social care, informing the police as required. If a child has not suffered or is not likely to suffer significant harm but a concern has still been raised, the DSL will seek advice from the local Multi-Agency Safeguarding Hub and refer for an Early Help assessment or to children's social care as appropriate. In all cases, children will also be provided with pastoral support in school which will involve Team around the Child approaches as necessary.

Notes about decisions to refer or not to refer, and reasons for this decision will be made. These notes and minutes from any meetings regarding the child will be kept confidentially on CPOMS, with access available only to the DSL and other members of the Safeguarding Team as appropriate. In some cases further interventions may be necessary and these can lead to inter-agency assessment using local processes which will be overseen by the DSL.

It is best practice to work with parents /carers and seek their consent before referring a child to external agencies. However, there may be cases where seeking consent would cause unnecessary delay or place a child at further risk of harm. In such cases, the DSL, or one of their deputies, may refer the child without parental consent.

If you have reported a concern to the DSL, you can and should request follow-up information to find out what actions are being taken to safeguard the child. You should also be aware that you may be asked to support social workers to take decisions about individual children, in line with guidance from *Working Together*.

The DSL will produce a termly safeguarding report for governors. This report will summarise all reports of safeguarding and child protection concerns and the actions taken in each case. The reports will not include the names of any pupils or staff, unless there is an exceptional reason to do so.

If you have reported your concern directly to a Local Safeguarding Children Board or the LADO, you should also expect a response within 2 days. If you are unsatisfied with the response provided, or if no response has been provided, you should contact the DSL, local authority children's social care or LADO as appropriate to request action. St Dunstan's College and the local authority children's social care each have escalation procedures if you are unsatisfied with the outcome of your concern. You should send your concern to the Head of the School or the local authority children's social care if, after registering your dissatisfaction with the initial result with the DSL, you still feel that more should be done. local authority children's social care escalation procedures vary by locality, and can be found on the local authority children's social care websites.

29.6 Early Help and Family Thrive
The College works with different boroughs, depending on the borough in which the family reside. However, the following information is based on Lewisham terminology, as that is the borough the school is based in and that the DSL attends regular safeguarding meetings with.

The College is committed to identifying children and families who may benefit from early support and providing help as soon as concerns emerge. Early intervention can prevent needs from escalating and improve outcomes for children and young people.

The school follows Lewisham's Multi-Agency Threshold Guidance, which is based on the London Continuum of Need and the statutory guidance Working Together to Safeguard Children (2026). The guidance assists practitioners in assessing a child's level of need and ensuring children and families receive the right support at the right time.

The four levels of need are:

- **Level 1 – Universal Needs:** Children whose needs are met through universal services.
- **Level 2 – Additional Needs:** Children and families who would benefit from early help to prevent needs from escalating.
- **Level 3 – Complex Needs:** Children and families requiring coordinated multi-agency support through targeted early help (Family Help) or other specialist services.
- **Level 4 – Acute Need:** Children who are suffering, or are likely to suffer, significant harm and require statutory intervention from Children's Social Care.

Community-Based Early Help

Community-based early help is available to all children, young people and families who require additional support before problems escalate. This support is provided through universal and community services and may include:

- schools and educational settings;

- health visitors, school nurses and primary healthcare;
- children's centres and family hubs;
- youth services;
- parenting programmes;
- community and voluntary sector organisations; and
- other local support services.

Where a child's needs can be met through community-based services, the school will work collaboratively with families and partner agencies to ensure appropriate support is accessed at the earliest opportunity.

Targeted Early Help (Family Help)

Where a child or family's needs are more complex, persistent or require coordinated support from several agencies, a referral may be made for Targeted Early Help (Family Help).

In Lewisham, Family Help provides consent-based, targeted support for children, young people and families whose needs cannot be met through community-based early help alone but who do not meet the threshold for statutory Children's Social Care intervention.

Family Help practitioners work with children, families and partner agencies to:

- undertake a Family Help (Early Help) Assessment;
- identify strengths, needs and desired outcomes with the family;
- coordinate a multi-agency plan of support;
- act as the Lead Practitioner where appropriate;
- convene and chair Team Around the Family (TAF) meetings;
- provide direct work with children, young people and parents/carers;
- support families to build resilience and sustain positive change; and
- regularly review progress to ensure support remains proportionate to the child's needs.

The school will actively participate in Family Help assessments, Team Around the Family meetings and review meetings, sharing relevant information to promote the safety and wellbeing of children.

Working with Parents and Carers

Where appropriate, the school will discuss concerns with parents or carers before making a referral for community-based early help or Targeted Early Help (Family Help), seeking their consent and encouraging their participation in the assessment and planning process. However, safeguarding the welfare of the child is paramount. Where there are concerns that a child may be at risk of harm, or where seeking consent would place the child at increased risk or compromise a safeguarding enquiry, the school will share information and make referrals without consent in accordance with statutory safeguarding guidance and local multi-agency procedures.

Reviewing Early Help

Where an Early Help or Family Help assessment is in place, the school will contribute to multi-agency planning and review meetings. The support plan will be reviewed regularly to consider progress, identify any changes in need and determine whether support should:

- continue;
- be increased through Targeted Early Help (Family Help) or statutory services; or
- be stepped down to community-based early help or universal services once outcomes have been achieved.

If, at any stage, there is evidence that a child is suffering or is likely to suffer significant harm, the Designated Safeguarding Lead (DSL) will make an immediate referral to Lewisham Children's Social Care in accordance with local safeguarding procedures.

Lewisham Family First Contact Point (FFCP)
Referrals to Children's Social Care are only made for children with needs at Level 3 or 4 of the Continuum of Need. This is determined where children are identified as requiring specialist services in order to achieve or maintain a satisfactory level of health or development or to prevent significant impairment of their mental and/or physical health and development and/or who are disabled. They may require longer term intervention from specialist services. In some cases these children's needs may be secondary to the adults needs. This is the threshold for an assessment led by children's social care under Section 17, Children Act 1989 although the assessments and services required may come from a range of provision outside of children's social care.

Staff with concerns should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the DSL/Deputy DSL/ Headteacher or the Chair of Governors (for allegations against the Headteacher) are all unavailable
- they are convinced that a direct report is the only way to ensure the child's safety.

As advised in KCSIE 2026 the DSL (including any deputies) should liaise with the three safeguarding partners in line with Working Together to Safeguard Children and NSPCC – When to call the Police

30. Safeguarding Allegations Against Staff: Procedures

At St Dunstan's College, we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers, trainee teachers and agency staff. St Dunstan's Education Group has a *Whistleblowing Policy* which is available in the Staff Handbook. Any allegation against a member of staff or a volunteer will be taken seriously. There are no thresholds of seriousness or credibility of any allegation. Allegations or concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a

child, parent / carer or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is an allegation if the person has:

- Behaved in a way that has harmed a child, or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and/or;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

Any Safeguarding and Child Protection allegations involving members of staff or volunteers must be reported *immediately* to the Head of the School without delay. An allegation against the DSL must be referred *immediately* to the Head of the school, without informing the DSL. An allegation against the Head of the school must be referred *immediately* to the CEO, without informing the Head of the school. An allegation against the CEO must be referred *immediately* to the Chair of Governors, or in his absence, the Deputy Chairman of Governors, who will take independent action. Where an allegation is against the CEO, the CEO must not be informed of the allegation prior to contact with the Chair of Governors and LADO. In this instance, the DSL will also not be informed.

The Head of the College will follow the procedures set out in *Keeping Children Safe in Education*, and may deputise the duties set out below to the DSL, as appropriate.

This will involve immediate contact with the Local Authority Designated Officer (LADO) to discuss the allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these. Discussions may also involve the CEO, DSL, legal advisors and Governors. All discussions should be recorded in writing and communication (or not) with both the individual and the parents / carers of the child / children will be agreed in consultation with LADO and any external agencies.

If, after discussion between the Head of the College (or DSL, if they have chosen to deputise to them) and the LADO, it is considered that the Head of the School should handle the allegation, then they will undertake the appropriate action promptly, and normally within 24 hours. Any decision about suspension will be taken after careful consideration with due weight given to the views of the LADO.

The Head of the College has to decide whether any concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Further information can be found in *Staff Handbook*. If the concern has been raised via a third party, the Head of the School (or DSL, if they choose to deputise to them) should collect as much evidence as possible by speaking directly to the person who raised the concern, to the individual involved and to any witnesses. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be 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.

- Low-level concerns should be recorded in writing, including:
- Name of individual sharing their concerns
- Details of the concern
- Context in which the concern arose
- Action taken

Records must be kept confidential, held securely and comply with the Data Protection Act 2018 and be kept at least until the individual leaves the Group's employment. The Head of the School's Executive Assistant oversees the tracking of low-level concerns and serious allegations against staff.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO. The records' review might identify that there are wider cultural issues within the school that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

The Head of the School will make every effort to maintain confidentiality and guard against unwanted publicity. The restrictions apply up to the point where the accused person is charged with an offence, or the DfE (Department for Education) and/or the TRA (Teaching Regulation Agency) publish information about an investigation or decision in a disciplinary case.

The Head of the School will ensure that the school reports to the DBS (Disclosure and Barring Service) any person (whether employed, contracted, a volunteer or pupil) whose services are no longer used for regulated activity and who have caused harm or posed a risk of harm to a child. In this context, ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging / refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher

training, or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence. 'Compromise agreements' cannot be used to prevent a referral being made to the DBS when it is legally required nor can an individual's refusal to cooperate with an investigation. The school will respond to requests from the DBS for information they hold.

The Head of the School will also consider making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had they not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Further guidance to making this decision is published on the TRA website.

If there has been a substantiated allegation against a member of staff, the school should work with the LADO to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

Parents or carers of the child concerned must be made fully aware of the allegations. If delay arises in consulting with the LADO, then the DSL or a named deputy should maintain daily contact with the parents / carers. However, the identity of the member of staff involved should not be given until specific legal advice has been obtained.
If the conclusion is that the allegation is completely unfounded, the decision to take the matter no further should be recorded, and the information placed in a confidential file.

When all actions undertaken as a result of the allegation have been completed, then any matters arising from that action will also be overseen by the DSL. The DSL will brief the Head of the School regularly on progress until all matters arising have been concluded.

In the event of enquiries being made by other parents /carers they should be told only that an allegation of misconduct has been made against a member of staff, and that it is being investigated. No further information should be given without first seeking legal advice. Any legal advice sought does not and will not override advice received from the LADO.

Where an allegation is made against an individual not employed directly by St Dunstan's College, for example a supply teacher, the school will ensure the allegation is dealt with properly. This may involve working with the LADO, police, and/or children's services and employment agencies to support collection of facts, taking the lead when appropriate, and keeping the agency's human resource manager updated.

31. Online safety and the use of mobile technology

Please note that Early Years phone policy is covered in the appendices.

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

To address this, our school aims to:

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

The 4 key categories of risk

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

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

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

- Educate pupils about online safety as part of our PSHEE (Stuart and Usherwood) curriculum, including:
- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyberbullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras on the school site:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - The exceptions to this are to access iSAMS, SOCs, Authenticator App and Teams for school purposes. These should be time-limited and, where possible, made clear to students what they are needing to use the device for. WhatsApp use is not permitted when pupils are present, even for communication with staff.
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras.

The School recognises that there will need to be expanded phone use during off-site activities, such as fixtures and trips, but this should always be as limited as possible and, keeping in mind, that we are phone-free as a default.

- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Carry out an annual review of our filtering and monitoring effectiveness. This will be conducted by the Director of Digital Services with the support of our DSL and IT support
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the Child Protection and Safeguarding Policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our IT policies which can be found on our website.

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

St Dunstan's College recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the

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

The College will treat any use of AI to access harmful content or bully pupils in line with this policy and our Behaviour policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education (KCSIE). Our full approach to AI is contained in our AI policy.

32. Care Lists and Counselling Services

There is a difference between safeguarding children who have suffered or are likely to suffer significant harm and those who may, for whatever reason, be in need of additional support (listening services and early help). The former are reported to Children's Social Care immediately whereas the latter can be helped in a variety of ways.

Pupil concerns will be dealt with in a friendly and supportive manner so that each pupil will develop the understanding that staff can be trusted to help in any situation. St Dunstan's College provides a secure environment for the pupils to talk to or consult with adults who can give help if and when it is required, or who will arrange appropriate assistance for the child using external, professional agencies.

Staff are trained to recognise variations in pupil behaviour that may indicate emotional or physical concerns and guidance and support is given to pupils who may be experiencing difficulties of a sensitive nature either within school or at home, by developing appropriate and effective strategies.

The pastoral teams in the Junior School and the Senior School provide pastoral support for pupils and additional, confidential support is provided by the school's counselling service. In some cases, further interventions may be necessary, and these can lead to inter-agency assessment using local processes which will be overseen by the DSL.

A safeguarding care list is also maintained.

- A safeguarding care list, categorised into three different levels will be maintained.
- The list is updated on a weekly basis in regular meetings between the Heads of Year (Senior School)/Heads of Sections (Junior School) and relevant Deputy Head Pastoral and on a fortnightly basis between the relevant Deputy Head Pastoral and the school's counsellors, College Nurse and SENCO.
- The list is reviewed alongside a review of other information, such as SEND, EAL, medical, academic or pastoral concerns.
- The list contains brief information on area of need, level of need and lead professional. Further details should be kept on CPOMS.
- Confidentially is crucial. No member of staff should ever divulge names on the safeguarding care list to any parent or to any pupil.

Level descriptors:

- *Pupil Watch* – Pupils who we are keeping an eye on, perhaps due to a recent small upset. These are included on the pastoral radar, rather than the safeguarding care lists.
- *Safeguarding care list level 1* – Pupils about whom there is an ongoing welfare concern that is being dealt with in school by pastoral care teams
- *Safeguarding care list level 2* – Pupils about whom there is an ongoing welfare concern that is being supported by external agencies such as CAMHS, children's social care or the NHS. Any academic or pastoral concerns should be channelled through the Head of Section/Year or identified lead professional.
- *Safeguarding care list level 3* – Pupils who have a significant ongoing welfare concern including all children on a child protection plan or children where there is a significant risk of harm such as an eating disorder or suicidal ideation. DSL to be informed immediately of any worrying incidents including absence from lessons etc. Any academic or other pastoral concerns should be sent to the Deputy Head Pastoral and identified lead professional, where appropriate.

In the Senior School and Junior School, a Pastoral Radar is produced and regularly updated to allow all staff to be aware of pupils who may need additional pastoral support. In the Junior School, weekly staff briefings allow for additional verbal updates on pastoral needs. Confidentially is crucial. No member of staff should ever divulge names on the safeguarding care list to any parent or to any pupil.

33. RSE, PSHEE and Pupil Voice

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

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

This is achieved through the delivery of our PSHEE programme which operates throughout St Dunstan's College, taught in our Stuart and Usherwood curricula. As one part of this programme, all pupils are given clear guidelines on the use of mobile phones and are taught how to stay safe online (including the dangers of cyber-bullying and sending nudes). This includes how to recognise when they are at risk and ask for help for example if they are being blackmailed online. In delivering this programme, the school refers to the resources of the UK Safer Internet Centre and CEOP's Thinkuknow website to ensure the most up to date resources are used. Further detail on the Stuart and Usherwood (PSHEE) programmes can be found in *the Curriculum policy* and on our approach to online safety in *the ICT Policy*.

All children at St Dunstan's College are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

The school also operates a College Parliament and a Peer-Mentoring Programme as part of its commitment to ensuring children's voices are heard and that children feel listened to.

Appendix 1 - EYFS Mobile phones

EYFS Use of phones by Staff

All staff who work within EYFS should ensure that their phone is put away and out of sight when children are present. The only exemption is if there is an emergency and there are no other means to get support.

Staff may use their phone in the staffroom and in areas where the EYFS children are not present.

Staff may book the school mobile phone to use on school trip.

Staff may use class iPads to take videos and photos to upload onto the online learning journal only (Tapestry). These remote devices must remain in school and be locked away when not in use.

Staff should exercise caution when using their phone outside of school hours. They should not accept requests from any pupils on social media platforms.

Staff should not take photos or videos of the children on their mobile phones.

If any member of staff is suspected of having unsuitable material on their phone, then the DSL should be contacted immediately.

Use of phones by parents/carers
Parents and carers are not permitted to take photos of their children during events.

Appendix 2 - EYFS Supervision

Supervision of Pupils
In Pre-School, the pupils are supported by a qualified teacher and three teaching assistants (two hold a Level 6 qualification). Each class in Reception has a qualified teacher and one teaching assistant. The key worker for the children will be the Form Teacher in Pre-School or Reception. All Early Years staff hold a full pediatric first aid qualification (PFA).

Each term all staff (including teaching assistants) are interviewed by the Head of EYFS to ensure that they are suitable to work with children. Each year they also complete a staff disqualification declaration.

Missing Child
The safety and whereabouts of all Junior School pupils are closely monitored throughout the school day. If a pupil is unexpectedly absent from a lesson, activity or supervised session, and their whereabouts is unknown, staff will immediately inform the Junior School Office and a member of the Junior School Leadership Team.

Checks will be undertaken without delay to establish the pupil's location, including contacting relevant staff and searching appropriate areas of the school site, such as classrooms, specialist teaching areas, the Wellness Centre, toilets, playgrounds, sports facilities and other supervised locations. Checks of their individual timetables for sessions such as LAMDA or Music Lessons will be completed.

If the pupil cannot be located promptly, the Junior School Deputy Head Pastoral (DDSL) and the Head of Junior School will assess the situation and determine any further action required in conjunction with the DSL. Where there are concerns that a pupil may be at risk or has left the school site, parents/carers and appropriate external agencies, including the Police, may be contacted.

Non-collection
Any child who has not been collected at the end of the day will be taken to the Junior School Office and parents/carers will be contacted. If parents/carers or alternative named contacts, who have been given permission by parents/carers to collect, cannot be reached after one hour then Children's Services will be called and their advice will be followed.

If a child has not been collected from Munchkins After School Care by 1800, parents/carers are called by Munchkins staff. A member of the Junior School Management Team will be informed and ready to support. If parents/carers or alternative named contacts, who have been given permission by parents/carers to collect, cannot be reached after a maximum of one hour then Children's Services will be called and their advice will be followed.

Supervision over the school day
Please see below both Pre-School and Reception supervision ratios throughout the school day. Ratios tend to lie above the recommended minimum to ensure the safety of the children.

Time	**Pre-School (19 children)** **Staffing: 1 Teacher (Level 6 Qualification)** **2 Teaching Assistants (2 Level 6 Qualifications)**
0820	Arrival - 3 members of staff
0835	Registration & Form Time - 3 members
	Snack Time - 2 members (while staff take breaks)
	2 members
1150	Lunch - 2 members (other staff in lunch hall available, if required)
1200	Walk Back to Classroom – 2 members
1215	In Class dance/music activities, followed by carpet session - 2 members
1245	3 members
1445	Snack - 3 members
1510	Dismissal - 3 Members 1 on the gate 1 dismissing children 1 supervising children attending After School Care

Time	**Reception (34 children)** **RE – 17 children** **Staffing: 1 Teacher (Level 6 Qualification)** **1 Teaching Assistant (Level 3 Qualification)** **RL – 17 children** **Staffing: 1 Teacher (Level 6 Qualification)** **1 Teaching Assistant (Level 6 Qualification)** **1 additional staff member in mornings (no qualification)**
0820	Arrival - 2 members
0835	Registration & Form Time - 2 members
0850	Phonics - 2 members
0950	Break - 1 member per class
1010	Snack time - 1 member (another member of staff always within shouting distance)
1050	Activity time - 2 members
1110	Period 2 - 2 members
1145	Lunch - 2 members supervising children, other staff nearby observing and supporting as required
1215	Walk to playground – 3 members
1215-1245	Play time – 2 members

1300	Period 3 - 2 members
1340	Period 4 - 2 members
1425	Break - 2 members
1445	Period 5 - 2 members
1515	Dismissal - 2 members

School trips
On school trips and visits, a separate risk assessment is always written. Ratios for children include 1:2 for Pre-School and 1:4 for Reception, however this can alter depending on the risks identified and location of the trip/visit. There will always be a member of staff on all school visits that holds a full Paediatric First Aid Qualification (PFA).

Wrap Around Care ratio

Please see below the ratio for wraparound care.

Before School Care 0745-0820	**Average 5 in EYFS**	**2 members of staff (One has PFA) Leadership team on site**
After School Care 1515-1800	Average 15 in EYFS	3 members of staff until 1730 (Four with PFA) 1 member of Leadership team on site until last child leaves

Appendix 3 - Safeguarding Questions

To ensure that appropriate candidates are selected for posts working with children, interviewers should explore the following areas:

- What is the candidate's motivation for working with children, and what has attracted them to this post
- Examples of relevant experience working with children
- Probing any gaps in employment / frequent changes in employment

If any of the following areas of concern are identified at interview, further probing questions must be employed.

- An implication that adults and children are equal
- A lack of recognition and/or understanding of the vulnerability of children
- Inappropriate idealisation of children
- Inadequate understanding of appropriate boundaries between adults and children
- Indicators of negative safeguarding behaviours.

All interviews at St Dunstan's College must include at least one of the following questions or ask for a response to a hypothetical safeguarding scenario.

Motivation

- Why do you enjoy working with children?
- Can you give an example of a time you have supported children in your role?

Child Protection

- What would you do if you were concerned about a colleague's behaviour towards children? What behaviours in a colleague would cause such concern?
- Have you ever been in a situation where you have been concerned about a child's welfare? If so, what did you do? Is there anything you would have done differently with hindsight? How did you feel about it?

Boundaries

- Can you give an example of how you have responded to challenging behaviour from a child? How did this affect you?

Scenario

- What would you do if you saw an unrelated staff member and a pupil sitting in a café together? Would that change if it was a staff member and a sixth former?

Appendix 4 - Self Harm

Staff can play an important role in preventing self-harm and also in supporting pupils, peers and parents / carers of pupils who self-harm or are recovering from self-harm.
"Every encounter with a young person who self-harms, for whatever reason, is an opportunity to intervene to reduce their distress and, potentially, to save a life… Young people benefit from a person who is able to listen to them non-judgementally, foster a good relationship, and encourage them to get help." *Royal College of Psychiatrists (2014)*

Key Facts about self-harm and suicide in children and young people

Self-harm refers to any act of intentional self-poisoning or self-injury, irrespective of motivation or intent

It can be considered as a spectrum of behaviours ranging from occasional self-scratching, to cutting, pulling of hair, head banging, taking an overdose with intent to die, or completed suicide.

Reasons for self-harming behaviour vary greatly from person to person
For some young people there is strong suicidal intent, but often there is no intent to die. Often, preceding the act of self-injury is a psychological experience of increasing anger, tension, anxiety, dysphoria and general distress or depersonalisation, which the person feels they cannot escape from or control. Engaging in self-harm provides a temporary release from these distressing emotions. Other reasons include: self-punishment, to draw attention so that other people can see their distress; to make other people feel guilty and change their behaviour; and to tie in socially with peers who self-harm. An immediate feeling of relief, gratification and/or release from depersonalisation follows the act of self-harm. However, despite this transient response, self-harm leads to longer-term negative consequences. Emotionally, it can evoke abiding complex feelings of guilt and shame towards the self.

Self-harm is common
About 17% of girls and 5% of boys will have self-harmed by the time they leave school. Self-harm rates increase from the age of twelve years and are highest in the late teens for females and in early adulthood for males. Onset of self-harm may be related to puberty, especially late or completed puberty, rather than chronological age. Self-harm rates are higher in adolescents from lower socioeconomic groups. About 80% of those admitted to hospital following an incident of self harm have overdosed and around 15% have cut themselves. In the community, cutting is a more common way of self-harming than taking an overdose.

Self-harm is often a hidden behaviour
There is much stigma surrounding self-harm. Only about 1 in 8 adolescents who self-harm present to medical services. Young people who self-harm often say that there was no one they could easily trust to talk to about how they were feeling, leaving them feeling isolated and lonely.

It is important to take self-harm seriously: as an expression of distress; because it causes body damage; and because it is linked with an increased risk of suicide

Although suicide in children and young people is very rare, it is the second most common cause of death among young people. Self-harm is one of the strongest predictors of death by suicide in adolescence, increasing the risk of suicide about ten-fold. Risk of suicide is greater in older adolescents, and in boys and young men who self-harm.

Investigations of suicides in young people young people suggest they usually belong to one of three groups:

- Those with complex, longstanding life and behavioural problems (school failure, family relationship problems, childhood sexual abuse, family violence, personality problems, low self-esteem, and poor peer relationships);
- Those with major psychiatric disorders
- Those in whom the suicidal process occurred as an acute response to life events, especially relationship problems.

Asking about suicide and self-harm does not increase the likelihood of harm to the young person.

It is important that all front-line professionals (including teachers, coaches, and other school staff) become familiar with asking about self-harm and suicide in an open minded, compassionate, way. Remember that self-harm may be a means of showing others how bad they feel.

What Children and Young People say about self-harm
In national surveys, young people say that conflicts with other people, for example, family members, siblings, teachers and boyfriends/girlfriends, are the most common reasons for self-harm. These conflicts could be about different things but they often make young people feel pushed away, left out, unfairly criticised or out of control. Young people also report that they can feel embarrassed or ashamed about self-harming, and that they fear being judged by others including professionals.

They say that it is often very difficult to know who they can talk to about their self-harming behaviour and the strong feelings that go with it, which may feel very private. This includes difficulty talking to their parents / carers (who report, themselves, often feeling guilty about their child's self-harm). Young people say they want to be able to talk to their teachers or GPs, for example, but they are not sure how to start the conversation, and may not feel encouraged by the professional.

Some young people have also voiced concerns with the attitudes of front-line professionals and their perceived lack of understanding of self-harm. These attitudes and perceptions can have a negative effect on the ways in which young people access help and support; many young people report turning to their peers and/or to online support instead of their GPs, teachers or parents.

The role of St Dunstan's' College in preventing and helping students recover from self-harm
St Dunstan's College has a duty to safeguard its pupils against all harm, including self-inflicted harm.

Lessons to be learned from the results of national surveys (see above) include:
It is important that the school provides high-quality, accessible Healthy Relationship Education for all pupils, to help them understand boundaries in relationships as well as managing conflict and breakdown in relationships.

It is important that a school-wide culture of openness, understanding and support around self-harm and other areas of mental ill-health in children is adopted, so all pupils feel able to talk to their teachers and other school staff without fear of ridicule, disbelief or shame.

It is important that all staff and pupils are educated in mental health. This can be achieved through curriculum, Stuart, assemblies and staff CPL. This education will be supported by the school-wide culture described above.

It is important to listen carefully to students who say that they are, or one of their friends is, self-harming. All instances of self-harming must be taken seriously and consistent procedures must be followed.

The family is a vital support network for young people. The school will in all but the most exceptional circumstances inform the parents / carers if it is discovered or suspected that their child is self-harming. We will work with the child to manage how the parents are informed.

Disclosure Procedures
If a pupil tells you that a friend is or may be self-harming:

Thank the pupil for coming forward and reassure them that it was the right thing to do. Tell the pupil that you will address the problem, but do not elaborate on how this will be done. Report the disclosure on CPOMS or if you are unable to use CPOMS report directly to the DSL, DDSL or another member of the safeguarding team.

If a pupil tells you that they are self-harming:
Speak to the pupil in a quiet place that allows for some privacy, bearing in mind *Staff Guidance on Interaction with pupils*. Ask if they can tell you what they have done and when they self-harmed – this will allow you to ascertain and prioritise any immediate medical care required. If you feel comfortable and confident, ask to see the injuries, ensuring this does not compromise the pupil's privacy. The pupil should be limited to raising sleeves or trouser legs to show injuries. Otherwise, the pupil should be sent to the Wellness Centre to be assessed by the College Nurse.

Report the disclosure on CPOMS, or if you are unable to use CPOMS, report directly to the DSL DDSL or another member of the safeguarding team.

If a pupil threatens self-harm or suicide:
Speak calmly to the pupil, in a quiet place that allows for some privacy, bearing in mind *Staff Guidance on Interaction with pupils*. Try to ascertain their intentions if able – is the pupil in immediate danger? If so, dial 999.

Reassure the pupil that they are being heard and that action will be taken to support them.

Report the disclosure on CPOMS, or if you are unable to use CPOMS report directly to the DSL, DDSL or another member of the safeguarding team.

Guidance for working with pupils who self-harm
If a child discloses to you that they are self-harming or threaten self-harm or suicide:

- Take all self-harm and threats of self-harm seriously
- Empathise. Treat the pupil with respect; get across that you care, and that you want to understand and help.
- Remain calm and compassionate.
- Remain non-judgemental. Reassure that you understand that self-harm may be helping the pupil to cope at the moment.
- Do not promise confidentiality
- Reassure the pupil that you will only tell other adults who can help, and that the pupil will know who you tell.
- Do not react with strong or negative emotions
- This includes alarm or discomfort; asking abrupt or rapid questions; threatening or getting angry; making accusations, e.g. that the pupil is attention-seeking; frustration if the support offered does not seem to be making a difference.
- Do not comment, advise or attempt to 'solve the problem'
- In the first instance. Simply listen, reassure and report. Show the pupil that they can trust that you will first *hear* what they have to say, and later *support* them if another professional needs to be involved.
- Make yourself available
- At the moment in time when the pupil seeks you out or responds to an invitation to talk further.

What Happens Next?
All cases of known or suspected self-harm will be treated seriously.
The DSL, DDSL or another member of the safeguarding team will follow the following advice (in accordance with our local safeguarding partners' advice):

The pupil has experimented with self-harm and has no intention to self-harm again.	The DSL and tutor/other trusted adult in the school have no other significant concerns about the pupil's wellbeing or safety. The appropriate pastoral team will check that the pupil is getting the support they need through school counselling or outside agencies as appropriate. The pupil's parents will be informed about the self-harm; however, the pupil will be involved in this. The pupil will be given the opportunity to talk to their parents before the school contacts them to follow up. If there is any doubt about the pupil's safety or wellbeing, the DSL, DDSL or another member of the safeguarding team will

	contact CAMHS in the appropriate borough for the pupil. The pupil will be placed on the Level 1 or Level 2 safeguarding care list to be monitored as appropriate.
The pupil is continuing to self-harm and/or there are underlying issues causing distress.	The DSL, DDSL, or another member of the safeguarding team must seek advice and input from other professionals. The DSL, DDSL or another member of the safeguarding team or other member of the safeguarding team will refer to CAMHS in the appropriate borough for the pupil. Further sources of support will be sought, in co-operation with CAMHS. The pupil's parents / carers will be informed, with the pupil given the opportunity to be involved in this. The pupil will be placed on the Level 2 Safeguarding Care list, depending on the response from CAMHS, and monitored as appropriate.
The pupil needs immediate protection to avoid serious harm (e.g., self-harm is increasing, persistent suicidal thoughts, plans or means to suicide, suspected abuse or neglect).	The DSL, DDSL or another member of the safeguarding team will refer the pupil to CAMHS and / or and follow the advice given at the time. If the pupil is already working with CAMHS or a social worker, the DSL, DDSL or another member of the safeguarding team. will phone the named professional. The pupil may be taken to A&E for an emergency assessment.
The pupil's life or health is in immediate danger following self-harm (e.g., overdose or significant injury).	**CALL 999**

Further Resources

Local (Lewisham) Services:
Lewisham Centre for Children and Young People (includes Child and Adolescent Mental Health Services (CAMHS)
Kaleidoscope Child Development Centre
32 Rushey Green
SE6 4JF
020 7138 1100

Specialist help for people who self-harm:

The National Self-Harm Network
A forum and resources for those who self-harm and their families, and for professionals who support them. Tips on what to do or say and what not to do or say if you are supporting someone who self-harms. Advice on the use of distractions if someone is trying not to self-harm.

The Mix
Offers help by telephone and email for young people (under 25) who self-harm
080 8808 4994

THESITE.org
TheSite.org offers information and support to 16-25 year-olds. It includes specific support and advice about self-harm.

Childline
Free and confidential support for children.
08000 111

Sources for this guidance
Hawton K, Saunders, K, O'Connor R (2012). Self-harm and suicide in adolescents. *Lancet*. 379: 2313-82.

Appendix 4 - Staff Guidance on Interaction with Pupils

Always

- Work in an open environment. Avoid private or out of sight locations and encourage open communication.
- Speak clearly, without whispering, so that students do not need to come close to hear
- Avoid spending time alone with individual students away from others. When this is necessary, e.g., when offering help after a lesson, ensure the door is open and you are working in a part of the room easily visible from the corridor. You should always let another member of staff know if you are working alone with a pupil.
- Treat all pupils, regardless of race, disability, religion or belief, gender, or sexual orientation equally and with respect and dignity
- Record any concern involving pupil welfare
- Be aware of proxemics; maintain safe and appropriate distances
- Avoid touching students, but where *educationally necessary* (for the purpose of care, instruction or restraint) staff should:
    - Try to demonstrate without touching first
    - Always be able to justify physical contact as unavoidable, summon a colleague as a witness where practical
    - Ask permission; say what you intend to do first and explain why
    - If a pupil seems uncomfortable, stop
    - If physical contact is necessary, only touch hands, arms or shoulder nearest you (don't reach across the body)
    - Be aware of overall proximity and maintain physical space between you and the pupil. Don't stand behind the pupil.
    - Do not touch a pupil's: chest, diaphragm, waist, thighs or buttocks
    - Move away as soon as the contact is no longer required
    - Restraint should involve only the minimum force necessary to protect children at imminent risk of harming themselves or others, or inflicting damage to property.

- Maintain professional boundaries. This may mean using a specific mobile phone or email address for work purposes, rather than personal details
- Present as an exemplary role model by drinking alcohol only in moderation at appropriate functions, not smoking, swearing, allowing suggestive conversations or jokes or wearing less than professional clothing when in the company of pupils
- Seek to be enthusiastic and constructive when giving feedback rather than making negative or critical remarks
- Record any injury that occurs and seek attention from the College Nurse or a qualified First Aider

Never

- Allow allegations made by a child to go unchallenged, unrecorded or not acted upon (this applies to any form of abuse or bullying)
- Lock doors, cover windows or use 'Do Not Disturb' signs
- Impose humiliating or power-based punishments on a student or reduce a pupil to tears
- Engage in rough, physical or sexually provocative games, including horseplay
- Allow or engage in any form of inappropriate touching

- Share a bedroom with a pupil
- Allow pupils to use inappropriate language unchallenged
- Make sexually suggestive comments to a young person, even in fun
- Engage in any form of relationship, sexual or otherwise, with a pupil you work with, even if they are over the age of consent
- Do things of a personal nature for pupils that they can do for themselves
- Invite or allow pupils to stay with you at your home unsupervised
- 'Friend' or 'follow' a pupil on social media, or allow them to 'friend' or 'follow' your personal social media accounts
- Take photographs or videos of pupils unless written/signed consent has been obtained from a parent/carer – see additional guidance below
- Seek physical contact. Try to gently discourage contact, rather than reject students. Model appropriate contact, e.g. shaking hands. Never allow physical contact when you are alone
- Take a child in your car. Where this is unavoidable:
    - Prepare a risk assessment after discussion with the DSL
    - Ensure your insurance covers business passengers and musical instruments
    - Obtain parental permission in writing
    - Take more than one person
    - Sit pupil(s) in the back
    - Travel directly to the destination
    - Keep conversation professional

Attachments
You must share your concerns with the Designated Safeguarding Lead (DSL) if:

- You suspect a pupil is becoming inappropriately attached to you or another member of staff, or
- Your relationship with, or feelings towards, a child or young person are placing you at risk of unprofessional behaviour.

Use of cameras and photographic images of pupils
Parents and carers are welcome to take photographs and videos of their own children during school events for personal and family use. We ask that any images containing other children are not shared publicly online without appropriate consideration for their privacy. The school may place restrictions on photography or filming where necessary to support safeguarding and the welfare of pupils.

If you suspect that photographs being taken by another adult are inappropriate in any way (too intimate, too numerous, etc.) then you should share your concerns immediately with the DSL.

The school will often arrange for photographs to be taken of major school events. When taking such photographs, staff need to be aware if there are pupils whose parent does not allow their children's image to appear in the School or Group's promotional material (information is noted on iSAMS).

Throughout the school, but particularly in the school's Early Years Foundation Stage, video and/or photographic evidence can sometimes be used to record the progress a child is making in order to inform future planning. The consent of a pupil's parent/carer should always be sought before using such an image in a public forum and in EYFS this must be taken using a school device.

NOTE: photography includes photos and videos made on a mobile phone. Ideally school-issued mobile phones or cameras should be used to photograph pupils. If a personal device is used to take a picture on a trip for example, the photo should be uploaded to the school network immediately upon return and then deleted from your device (including the Deleted Items folder). No staff should be in possession of images of pupils on their personal devices for longer than strictly necessary.

Separate rules apply to the use of mobile phones in the Early Years Foundation Stage. Any staff working in this area must read and adhere to the *Appendix 1 - EYFS Mobile Phones.*

Staff and Social Media

Staff who use social media for personal purposes must ensure that their professional reputation (and that of the school) be upheld at all times. Whilst it is possible to use privacy settings to control who sees a personal account, these settings are easily altered. Furthermore, if another individual is 'tagged' or comments on your post or if you post to another person's page, your post may be subject to the privacy settings of the other user. In this way, inappropriate content may be leaked.

Staff should never connect with pupils (current or recently left) or parents of these pupils through their personal social media. School-based accounts may be used for educational purposes, provided every post can be seen by everyone in the group, and that each post is monitored by one or more admin users (at least one of whom should be staff) and can be removed if necessary.

Staff should not breach any confidentiality by sharing images or information about the school, staff or students. Any such breach, as well as inappropriate use of social media which could bring the school into disrepute, is a disciplinary matter.

Appendix 5 – Suicide Prevention

St Dunstan's College aims to ensure that children and young people at our school are as suicide-safe as possible and that our governing body, parents and carers, staff and pupils are aware of our commitment to be a suicide-safer school.

The school is aware that suicide is the leading cause of death in young people and we can play a vital role in preventing suicide in the young people in our care.

Suicidal thoughts are common among young people and it is therefore important to combat stigma as the stigma around talking about suicide and mental health can be a barrier to seeking help and offering help in a timely manner. We promote open but sensitive talk about suicide, avoiding unhelpful language such as associating suicide with crime.

We are aware that talking appropriately about suicide does not create or worsen risk and so we will ensure pupils have the opportunity to speak freely about their worries with members of staff who are appropriately trained, willing and able to help.

Mental Health Awareness and Support
Staff and pupils are educated in mental health, including self-care, through our Usherwood programme which is delivered through form/tutor time, assemblies, Forder sessions, participation and drop-down days.The school also participates in national awareness campaigns such as World Mental Health Day and encourages pupils to play a lead role in positive promotion of mental health.

The school offers mental health support through our pastoral teams, counsellors, Mental Health First Aiders and through referral and signposting to external safeguarding partners and mental health services. Each pupil with a welfare concern is allocated a lead professional and is placed on the school safeguarding care list. Our virtual learning environment (VLE) includes a 'help' button allowing pupils to send a message to the school safeguarding team online when they are in need of support.

The school has a clear anti-bullying policy based on restorative principles to enable conflict between pupils to be resolved at an early stage as we know peer-to-peer abuse is a risk factor for poor mental health. Further detail is available in the Anti-bullying policy.

Students in the Senior School are educated on what to do if another child such as a peer or sibling discloses thoughts of suicide and that they should immediately speak to a trusted member of staff who can arrange appropriate support. Pupils in the Junior School are educated on what to do if they are concerned about the mental health and wellbeing of a peer and know to immediately speak to a trusted member of staff who can arrange appropriate support.

Language and Portrayal of Suicide
The school will refrain from using unhelpful language such as associating suicide with being a crime or referring to a 'successful suicide.' Instead, we will use language recommended by the suicide prevention charity *Papyrus*, such as 'died by suicide.' Staff will be reminded of this in annual suicide awareness training.

The school is aware that talking about methods of suicide can be dangerous and lead to imitative behaviour. Such discussions will not take place in academic lessons or pastoral sessions without direct oversight from the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead. Any treatment of the subject of suicide needs to be sensitive, avoid propagating myths and avoid any sense of romanticising suicide.

Intervention and assessing risk including after attempted suicide
If a member of staff has reason to suspect that a child may be experiencing thoughts of suicide, a trained member of staff will communicate directly with the child using age-appropriate language. Concerns will also be shared with parents / carers and with external mental health services and children's services if they have not already been informed.

Staff should handle any disclosure of suicidal thoughts in the same way as any other safeguarding disclosure. The pupil should be supported without promising confidentiality and the information must be passed on to the safeguarding team and via CPOMS for further action.

The school will conduct a risk assessment when made aware of any pupil who is experiencing suicidal thoughts, whether notified by parents / carers, staff or pupils. This assessment will assess risk of harm to the affected pupil, other pupils and staff and look at how to mitigate against these risks. Key details of the risk assessment will be shared with relevant staff after seeking consent from child and parents.

If, after assessing all available support and mitigation, the school does not feel able to mitigate against the risks to an acceptable level, we will ask that the child remains at home, as with physical illness, until we are able to ensure risks are at an acceptable level and suitable support is in place.

If we believe a child is at imminent risk of harm, we will ensure the child receives help from emergency services by calling 999, taking the child to Accident and Emergency or asking parents / carers to take the child to Accident and Emergency. Minor injuries will be assessed by the Nurse or other first aider who will provide care and advice.

Any child who has engaged in suicidal behaviour who is attending school will need to have a suicide safety plan in addition to a risk assessment. Safety plans are often created in conjunction with a therapist from Children and Adolescent Mental Health Services however, in the event that this is not provided, the Papyrus suicide safety plan will be used by one of the counsellors, who will work with the child and parents / carers to agree the plan for how the young person will keep themself safe from suicide. This plan will always contain the details of a relevant medical professional and helpline for specialist support.

Direct signals of suicidal intent include: talking or writing about wanting to kill or hurt oneself; feeling hopeless or being a burden; as well as looking for ways to kill oneself including online or in person.

Potential indirect signals of suicidal intent include: withdrawal, deterioration in social function, mood swings, reckless behaviour, uncontrolled anger and substance abuse.

Training
The School's Leadership Team facilitates relevant staff training, including Designated Safeguarding Lead Training, Mental Health First Aid and Suicide Awareness training for pastoral staff and bespoke in-house training for all staff working with children and young people.

School Response to a suicide
In the event of a suicide, St Dunstan's Executive Team should be informed immediately and an extraordinary meeting convened. The Chair of the Group Board and the Chair of the Local School Board must also be informed immediately.

A lead contact from within the Executive Team will be designated to liaise with the family of the deceased and any other connected support services. In the event of a suicide, this would ordinarily be the Designated Safeguarding Lead or Head of the Junior School.

If a suicide occurs, it is particularly important that any enquiries from the press are handled sensitively. The Chief Operating Officer (CEO) or in his absence, the Chief Operating Officer (COO) will be responsible for handling all press enquiries. All and any approaches from the press should be directed to the CEO office and no comment provided by any other member of staff. Suitable language for use when speaking about suspected suicide in press communications can be found .

Further information on the school's response to a death in the community, including suicide, can be found in the Pastoral Care Policy.

Supporting Pupils Affected by Suicide
A pupil who has been impacted by suicide, whether in their family or friendship group, may suffer long-term impacts, including being at increased risk of suicide themselves.The school offers support from the immediate pastoral team, and counsellors and can also support with referrals to external agencies such as CAMHS and signposting to relevant charities such as Papyrus.

The school maintains a safeguarding care list of pupils about whom we have an ongoing welfare concern. Pupils who have been impacted by suicide will remain on this list of pupils in need of additional support for the duration of their time at the school.

Reducing Access to Lethal Means
The school understands that a key aspect of suicide prevention is restricting access to lethal means. The Health and Safety Committee meets regularly and reviews advice from the HSE and other relevant organisations and ensures school compliance in storage of chemicals, sharps such as craft knives, medicines and other potentially hazardous materials.

Useful resources
Further useful resources can be found at

- https://papyrus-uk.org
- https://www.samaritans.org/how-we-can-help/schools/

Appendix 6 – Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.
If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.
Visitors are expected to sign in at reception and wear a visitor's lanyard.

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

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

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.
The school welcomes parents / carers and other visitors to our schools and understands the importance and benefits of these visits. At the same time, the school is committed to safeguarding the welfare of pupils and staff as well as protecting facilities and equipment.
This policy applies to visitors to the school during normal school hours and outside of school hours when children are on site in connection with the purposes of the school.

Separate documentation and procedures are in place for individuals, community groups or organisations hiring the school premises for purposes not connected with the school ('hirers'). Hirers are therefore not in the scope of this policy.

Further information is contained in our Visitors and Contractors policy.

Appendix 7 – Nude or Semi-Nude Images

What do we mean when we refer to sending nudes and semi-nudes?

- This 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. This could involve public sharing via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via WhatsApp or via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Alternative terms used by adults may include sexting, youth-produced sexual imagery or indecent imagery. Nudes and semi-nudes also includes AI-generated intimate images.

- The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Images may be created or shared consensually. Conversely, the sharing of nudes or semi-nudes could constitute peer-on-peer abuse. Section 13 in Part A of this policy gives further information to help schools define an incident in order to ensure an appropriate and proportionate response.

- However creating and sharing nudes and semi-nudes of under-18s, even with consent, is always illegal and the response needs careful management.

- This advice does not apply to adults sharing nudes or semi-nudes of under 18-year-olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency. Children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images should be dealt with under the *Safeguarding and Child Protection Policy* and *Expected Pupil Behaviour Policy* as appropriate.

- It is accepted that young people experiment and challenge boundaries, and therefore the risks associated with online activities can never be completely eliminated. However, St Dunstan's College takes a proactive approach to e-safety to help students understand, assess, manage and avoid the risks associated with online activity, including an annual visit from a UKCIS specialist to explain the risks and legislation to Senior School students.

- The Group recognises its duty of care to its pupils who do find themselves involved in such activity as well as its responsibility to report such behaviours where legal or safeguarding boundaries are crossed. Furthermore the Group recognises that the response to an individual case can affect school-wide culture, peer responses and the willingness of other children to speak out.

- The DSL must always be informed of any incidents of pupils sending nudes or semi-nudes and the DSL will consider the range of contributory factors in each case in order to determine an appropriate and proportionate response. This includes placing the child's sexual behaviour within the context of their age and development, using tools such as Brook's Sexual Behaviours traffic light tool and the Hackett continuum of children and young people's sexual behaviours.

Steps to take in the event of an incident
Initial response

- Manage the disclosure from the child in line with the *Safeguarding and Child Protection Policy*. Recognise that the child is likely to be worried and embarrassed so the staff member should ensure the child is comfortable and only sensitive and appropriate questions are asked.
- Following the disclosure, refer to the DSL as soon as possible.
- DSL holds an initial review meeting with the staff member who heard the disclosure and any other members of the safeguarding team needed.
- DSL holds a follow up interview with the child(ren) if appropriate.
- Parents are informed and are involved in the process unless there is good reason to believe that involving them would put the child at risk of harm.
- A referral should be made to Children's Social Care and/or the police if the child has been harmed or is at risk of harm at any point in the process.

Initial review meeting

- Establish whether there is an immediate risk and whether a referral needs to be made to Children's Social Care or the Police.
- If it is necessary to view the image to safeguard the child. Images should not be viewed unless there is no other way to safeguard the child (see Appendix 3 for parameters).
- Establish what further information is needed.
- Establish whether the image has been shared widely and via which platforms. Does immediate action need to be taken to delete or remove images.
- Add any relevant context about the child(ren) involved.
- Decide who else needs to be contacted – other individuals, educational settings and parents.

Option 1: external referral

A referral through MASH must be made if the incident:

- Involves an adult
- Involves blackmailing, coercion or inability to consent
- Is unusual for the child's developmental stage or is violent
- The child in the images is under 13
- The child is at risk due to the sharing of nudes or semi-nudes – is self-harming or suicidal
- If a report is made to the police, this will be recorded as a crime although it does not mean the child involved will have a criminal record.

Option 2: manage internally

If none of the above apply, the incident may be managed internally **if** enough information about the risks is *known* and those risks can be managed internally using the Group's *Safeguarding and Child Protection Policy* and *Expected Pupil Behaviour Policy*.

The decision must be recorded on CPOMS in accordance with the policies above.
Key questions to decide whether it is appropriate to manage an incident internally are:

- Why was the image shared? Was it consensual or coercive?
- Has it been shared without consent or beyond the intended recipient?
- Has the image been shared online? What steps have been taken to contain this?
- How old are the children involved?
- How many people was the image sent to?
- Is the child otherwise vulnerable?
- Would informing parents put the child at risk?

Support for the child(ren) involved

- The child should be interviewed by the DSL, if possible, to establish the facts and determine the best course of action.
- The child's views must be taken into account. They should be reassured of available channels for support and that they will be kept informed throughout the process.
- The interview should use the Tell Describe Explain model for managing disclosures and should not victim-blame.
- The child should be reminded about consent and trust within healthy relationships and advised on who to tell if they feel this consent and trust has been breached.
- The child should be made aware of the laws around sending nudes and semi-nudes but reassured that the intent is not to criminalise children.
- The child should be supported to use Childline's Report Remove tool to get the image removed, delete the image from their own devices and report on any individual sites where the image has been posted.
- Parents / carers should be informed unless this will cause further harm so that they can support with the above messaging and actions.
- Further information on support for children is found in the guidance *Sharing nudes and semi-nudes: advice for education settings working with children and young people (December 2020)*

Searching devices

- The Searching, screening and confiscation advice for schools highlights how the Education Act 2011 gives schools the power to search pupils for devices, search data on devices. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.
- If during a search a teacher finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of school discipline. They can also decide whether the material is of such seriousness that the police need to be involved.
- If the school has decided that other agencies do not need to be involved, then consideration should be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing.
- In most cases, children and young people should be asked to delete the imagery and to confirm that they have deleted them. They should be given a deadline for deletion across all devices, online storage or social media sites. They should be reminded that

possession of nudes and semi-nudes is illegal. They should be informed 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.
- Any decision to search a child or young person's device and delete imagery should be based on the professional judgement of the DSL and should always comply with the safeguarding or child protection policy and procedures of the education setting. All of these decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed unless this presents a further risk to any child or the young person.
- Schools must avoid viewing nudes or semi-nudes unless absolutely necessary to safeguard the child.

Recording incidents
All decisions made and actions taken must be logged in accordance with the school *Safeguarding and Child Protection Policy* which generally will involve logging on CPOMS. Referrals made to external agencies should also be logged here. Nude or semi-nude images should not be copied, shared or stored.

Educating children and young people about nudes
All children are taught about online safety, including the risks of sharing nudes and semi-nudes, during lessons including those of Computer Science, the Stuart Additional Curriculum which incorporates RSHE lessons and form/tutor time, as well as during our annual visit from a UKCIS specialist who talks to all Senior School year groups about online safety.

This content includes:

- What does it mean to share nudes or semi-nudes
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to peoples' feelings and reputation
- Strategies and skills required to manage specific requests or pressure to provide (or share on) such images and/or the receipt of such images
- Who to tell; what to say; what to do; what not to do and where to get support from within and outside of the education setting.

In the Junior School, pupils are taught to recognise digital risks and how to use safe online behaviour, as well as how to build healthy peer relationships and understand consent. This is covered through Computing lessons and the Stuart Curriculum.

The law
Responding to incidents of sharing nudes and semi-nudes is complex because of its legal status. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18.

The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales): It is an offence to possess, distribute, show and make nude or semi-nude images of children.

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

The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal. The relevant legislation is contained in section 33 of the Criminal Justice and Courts Act 2015.

The NPCC has made it clear that incidents involving sharing nudes and semi-nudes should have an immediate focus on safeguarding children, not on criminalising them unnecessarily. Further information on the police response is found in *Sharing nudes and semi-nudes: advice for education settings working with children and young people (December 2020).*

Viewing and deleting nudes and semi-nudes
Staff and parents / carers must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so as outlined below. Wherever possible, responses to incidents should be based on what DSLs (or equivalents) have been told about the content of the imagery.

The decision to view any imagery should be based on the professional judgement of the DSL (or equivalent) and should always comply with the child protection policy and procedures of the education setting. Imagery should never be viewed if the act of viewing will cause significant distress or harm to any child or young person involved.
If a decision is made to view imagery, the DSL (or equivalent) would need to be satisfied that viewing:

- 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
- Is 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 young person or parent or carer in making a report
- 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

If it is necessary to view the imagery then the DSL (or equivalent) should:

- Never copy, print, share, store or save them; this is illegal. If this has already happened, please contact your local police for advice and to explain the circumstances
- Discuss the decision with the headteacher 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 headteacher or a member of the senior leadership team
- Make sure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the headteacher 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. Ensure this is signed and dated and meets any appropriate wider standards e.g. such as those set out in statutory safeguarding guidance and local authority policies and procedures.
- 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.

If nudes or semi-nudes have been viewed by a member of staff, either following a disclosure from a child or young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring school systems), DSLs (or equivalents) should make sure that the staff member is provided with appropriate support. Viewing nudes and semi-nudes can be distressing for both children, young people and adults and appropriate emotional support may be required.