The Gallery Trust Child Protection and Safeguarding Policy

Orion Academy
(adapted central policy)

2026/2027

This document is based on guidance from
Keeping children safe in education 2026 - GOV.UK
and Working Together to Safeguard Children 2026 - GOV.UK

Monitoring arrangements

This policy will be reviewed at least **annually and/or following any updates to national and local guidance and procedures** by The Gallery Trust Designated Safeguarding Manager. At every review, it will be approved by the Board of Trustees.

Updated	1st September 2026
Date ratified	21 September 2026
Chair of Trustees	Chris Scrivener
Safeguarding Trustee	Helen Barter
Chair of RIB	Simon Terrington
Designated Manager for Gallery Trust	Alison Cox

This policy sets out the child protection and safeguarding policy and procedures for The Gallery Trust

Contents

Section	Page
Part 1	
Contacts	4
Aims	5
Legislation and Statutory Guidance	5
Principles and Values	7
Definitions	8
Acronyms	10
Equality Statement	10
Roles and Responsibilities	11
Confidentiality	17
Recognising Abuse	18
Online Safety	31
Part 2	
Students with special educational needs, disabilities, or health issues	34
Students with medical conditions	34
Young Carers	35
Students with a social worker	35
Children We Care For (CWCF)	35
Students who are lesbian, gay or bi-sexual	36
Students who are questioning	36
Part 3	
Complaints and concerns about schools safeguarding policies or procedures	39
Part 4	

Based on [Keeping children safe in education 2026 - GOV.UK]

Training	41
Links with other polices	43
Part 5	
Appendix 1: Types of abuse	44
Appendix 2: Specific safeguarding issues	46
Appendix 3 Other information	61
Appendix 4: Safer recruitment and selection processes	64

PART 1 Child Protection and Safeguarding

Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
School		
Designated Safeguarding Lead (DSL) (Strategic Overview)	Julia Hyde	julia.hyde@orionacademy.co.uk 01865 771703 (Orion Academy)
Deputy DSL (DDSL) (Operational Overview)	Gail Phillips	gail.phillips@orionacademy.co.uk 01865 771703 (Orion Academy)
Deputy DSL - DDSL	Rani Tandon	rani.tandon@orionacademy.co.uk 01865 771703 (Orion Academy)
Deputy DSL - DDSL	Joseph Barrett	joseph.barrett@orionacademy.co.uk 01865 771703 (Orion Academy)
Deputy DSL - DDSL	Jerrome Sobers	jerome.sobers@orionacademy.co.uk 01865 771703 (Orion Academy)
Designated person for Children We Care For	Rani Tandon	rani.tandon@orionacademy.co.uk 01865 771703 (Orion Academy)
Designated Safeguarding Lead for Branch out provision	Jerrome Sobers	jerome.sobers@orionacademy.co.uk 01865 771703 (Orion Academy)
Designated person for PREVENT	Julia Hyde	julia.hyde@orionacademy.co.uk 01865 771703 (Orion Academy)
Designated person for children with medical needs	Gail Phillips	gail.phillips@orionacademy.co.uk 01865 771703 (Orion Academy)
Designated person for online safety	Julia Hyde	julia.hyde@orionacademy.co.uk 01865 771703 (Orion Academy)
Executive Headteacher	Julia Hyde	julia.hyde@orionacademy.co.uk 01865 771703 (Orion Academy)
Rapid Improvement Board (RIB) Chair	Simon Terrington	c/o The Gallery Trust: 01865 557004 or c/o Orion Academy: 01865 771703
Trust		
Designated Safeguarding Manager for Gallery Trust	Alison Cox	a.cox@thegallerytrust.co.uk Mobile: 07385 724198

Safeguarding Trustee	Helen Barter	h.barter@thegallerytrust.co.uk c/o The Gallery Trust: 01865 557004
Chair of Trustees	Chris Scrivener	c.scrivener@thegallerytrust.co.uk
Other		
Local Authority Designated Officer (LADO) and	Jo Lloyd	Lado.safeguardingchildren@oxfordshire.gov.uk 01865 810603
Education Safeguarding Advisory Team	Manager: Jo Lloyd	ESAT.safeguardingchildren@oxfordshire.gov.uk 01865 810603
Multi Agency Safeguarding Hub (MASH)		0345 050 7666
MASH Education Rep	Katrina Johnson	Katrina.Johnston@oxfordshire.gov.uk) 0345 050 7666
Out of Hours emergency duty team		0800 833 408
Police		101 In emergencies 999
Channel helpline		020 7340 7264

All schools in The Gallery Trust recognise its responsibility for safeguarding and child protection.

1. Aims

The trust aims to ensure that:

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

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Academy trusts: governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to The Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of students at the school
- Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our trustees and headteacher should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our trust and its schools to take positive action to deal with particular disadvantages affecting students with certain protected characteristics (where we can show it's proportionate). This includes the duty to make reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as: sexual violence; homophobic, biphobic or transphobic bullying or racial discrimination
- Operation Encompass statutory guidance, which explains that the police must notify any relevant education establishment of any incidents involving domestic abuse

For schools with students under the age of 8 within the Trust:

- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the

'2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children

For schools with early years within the Trust:

- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

This policy also complies with:

- our funding agreement and articles of association.
- The Oxfordshire safeguarding Children Partnership policies and procedures.

3. Principles and Values

Children have a right to feel secure and cannot learn effectively unless they do so.

All children have a right to be protected from harm. All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account *contextual safeguarding* (see Part 2) in accordance with the guidance.

We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children.

Whilst the school will work openly with parents as far as possible, it reserves the right to contact Children's Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

4. Definitions

Definitions table

Safeguarding and promoting the welfare of children means	• Providing help and support to meet the needs of children as soon as problems emerge • Protecting children from maltreatment whether that is within or outside the home, including online • Preventing impairment of children's mental and physical health or development • Ensuring that children grow up in circumstances consistent with the provision of safe and effective care • Taking action to enable all children to have the best outcomes
Child protection	is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
Abuse	is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
Neglect	is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.
Making or sharing of nudes or semi-nudes	is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.
Children	includes everyone under the age of 18.

3 safeguarding partners	The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs: ● The local authority (LA) ● Integrated care boards (previously known as clinical commissioning groups) for an area within the LA ● The chief officer of police for an area in the LA area They work with relevant partners through the Oxfordshire Safeguarding Children Partnership (OSCP), under the leadership of an Independent Chair
Victim	is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
Alleged perpetrator(s) and **perpetrator(s)**	are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of students) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.
Staff	applies to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity. This also includes parent volunteers, LAB or RIB members, and The Gallery Trust Trustees.
Parent	refers to birth parents and other adults in a parenting role, for example adoptive parents, step-parents, foster carers, special guardians.
Exploitation	**r**efers to Child exploitation which is when someone uses a child for financial gain, sexual gratification, labour or personal advantage.

Based on [Keeping children safe in education 2026 - GOV.UK]

5. Acronyms

DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead
OSCP	Oxfordshire Safeguarding Children Partnership
LCSS	Locality Community Support Service
MASH	Multi Agency Safeguarding Hub
LADO (DO)	Local Authority Designated Officer
DSM	Designated Safeguarding Manager
ST	Safeguarding Trustee
LAB	Local Academy Board
RIB	Rapid improvement Board

6. 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 are all vigilant to the special needs (SEN), disabilities or health conditions that our children have, and recognise this may make them even more vulnerable to abuse.

We give special consideration to children who:

- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are Children We Care FOR (CWCF) or previously CWCF
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

7. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and trustees, and those serving on committees or local committees and governance professionals across our trust and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The trust and its schools play a crucial role in preventative education. This is in the context of a whole-school approach to preparing students 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 academy which is based on the DfE Behaviour in schools guidance
- Pastoral support
- Planned programme of Relationships, Sex and Health Education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships.
    - Boundaries and consent.
    - Stereotyping, prejudice, and equality.
    - Body confidence and self-esteem.
    - How to recognise an abusive relationship (including coercive and controlling behaviour).
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support.
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable.

7.1 All staff

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (KCSIE), in full and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for students who are LGBTQ+ to speak out and share their concerns
- Receive appropriate safeguarding and child protection training which is updated regularly.

- Receive training around online safety which includes
    - an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
    - how to respond to the inappropriate use of online technologies
- Receive safeguarding and child protection (including online safety) updates (for example,
    - via email
    - e-bulletins
    - staff meetings
    - regular training throughout the school year
    - morning briefings

  as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- Receive training to support them if a child makes a disclosure
- Stay calm and do not show that you are shocked or upset.

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 DSL and DDSL's for their school
    - the role and identity of the trust DSM
    - the behaviour policy for their school
    - the online safety policy for their school,
    - the safeguarding response to children who go missing from education/who are absent from education
- The trust'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

7.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team: the DSL at Orion Academy is Julia Hyde (Executive Headteacher). The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. In an urgent safeguarding situation, the DSL or DDSL can be contacted out of school hours on 07940 731829.

Contact details of the other DDSLs can be found at the beginning of this Policy:
Rani Tandon, Joseph Barrett and Jerrome Sobers.

If the Academy DSL team is not available, Alison Cox, The Gallery Trust Designated Safeguarding Manager, will act as cover (for example, during out-of-hours/out-of-term activities).

Contact details: a.cox@thegallerytrust.co.uk

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (Oxfordshire MASH LADO, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Make sure that staff have appropriate Prevent training and induction
- Act as a lead practitioner for the local authority

The DSL will also:

- Keep the Executive Director / Designated Safeguarding Manager informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensure that child protection files are kept up to date on our electronic CPOMS system, ensuring there are clear actions and outcomes
- Where children leave the school, ensure their child protection file is transferred to the new school

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

7.3 The Trustees and LAB / RIB members

The Trustees and Local Academy Board / Rapid Improvement Board members will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Ensure that all staff who work directly with children read **at least part 1** of Keeping Safe in Education (KCSIE) and those staff who do not work directly with children read **part 1** of KCSIE
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation.

- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- Appoint a Trustee to monitor the effectiveness of this policy in conjunction with the full board of trustees. The Safeguarding Trustee for the Gallery Trust is Helen Barter
- The trustees will make sure:
    - An appropriate senior member of staff from the school leadership team is appointed to the role of the designated safeguarding lead.
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
    - That all staff undergo appropriate safeguarding and child protection training, relevant to their role that covers online safety, and their role and responsibilities in relation to filtering and monitoring, and that such training is regularly updated and is in line with advice from the safeguarding partners
    - Ensure that each school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect students
    - Ensure that all schools in the Trust have appropriate cyber security systems in place and review their effectiveness at least once every academic year. This includes:
        - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
        - Ensuring that reviews are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
        - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the schools in meeting these standards
        - Appoint an appropriate 'case manager' in the event that an allegation of abuse is made against the headteacher/head of school

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within a whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level

concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors). See our Allegations Management Policy and Low Level Concerns policy for further details
- This policy reflects that The Gallery Trust is a Trust of special schools and that all our students can face additional barriers to any abuse or neglect being
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed.
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

All Trustees and LAB / RIB members will read Keeping Children Safe in Education in its entirety to ensure that they understand their management responsibilities, and the statutory duty that the trust will work to.

The Gallery Trust Board of Trustees has responsibility for safeguarding and child protection across all schools

7.4 The Headteacher / Executive Headteacher / Head of School

The Executive Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and updating the content of the training regularly.
- Acting as or appointing an appropriate person as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see part 3 for more details and our allegations management policy).
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

Our primary schools and early year providers:

The Headteacher/head of school will:

- Ensure the relevant staffing ratios are met, where applicable
- Ensure each child in the Early Years Foundation Stage is assigned a key person
- Oversee the safe use of technology, and devices like mobile phones and cameras in the setting

7.5 Local Authority Virtual School Head Teachers

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

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

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

8. Confidentiality

Our staff are all aware of the importance of upholding confidentiality. However, all staff know that the safeguarding of our students will always be our priority, and this will be paramount over UK GDPR.

- 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 and 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:
    - The DSL will still contact Oxfordshire MASH, and act upon the advice that they provide
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children, but will always act in the best interest of the child
    - The DSL will consider that:
        - Parents or carers should normally be informed (unless this would put the victim at greater risk)
        - If it is believed that a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to the MASH

        - 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 includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

    - The OSCP also provides guidance and advice https://www.oscb.org.uk/wp-content/uploads/2019/06/GDPR_Remember-002.pdf
    - 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

All our staff sign a confidentiality agreement and The Gallery Trust Code of Conduct

9. Recognising abuse and taking action

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

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 for a child who:

- Has a disability or has certain health conditions and has specific additional needs
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved

- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

Staff, volunteers, trustees and local board members must follow the procedures set out below in the event of a safeguarding issue.

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

Make a referral to the MASH and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

If a member of the DSL team is not available our staff know they must make the referral.

- Tell the DSL as soon as possible if you make a referral directly.
- Referrals can be made over the phone and then must be followed up by completing the online MASH referral form through the MASH portal:

https://www.oxfordshire.gov.uk/business/information-providers/multi-agency-safeguarding-hub
https://www.gov.uk/report-child-abuse-to-local-council

9.2 If a child makes a disclosure to you

- Listen to and believe them.
- Allow them time to talk freely
- Do not ask leading questions if you need to ask further questions to clarify and gather further details remember T.E.D and the "WH" questions:
    - Tell me
    - Explain to me
    - Describe to me
    - Where …….
    - Who …….
    - What …….
    - When …….

- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Alert the school DSL immediately.
- Record your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Alternatively, if appropriate, make a referral to the MASH and/or the police directly, and tell the DSL as soon as possible after that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready or know how to tell someone that they are being abused, exploited or neglected.
- Not recognise their experiences as harmful.
- Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

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

9.3 If you discover that FGM has taken place or a student is at risk of FGM

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

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

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

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

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

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

- **Consent and Choice:** For adults over 18, sharing information or involving agencies like the police or social care requires the individual's consent, unless there is an immediate risk to life or safety or another vulnerable person is at risk.
- **Police Contact:** If a crime is being reported or there is an immediate safety concern, contact Thames Valley Police by calling **101** (non-emergency) or **999** (emergency).
- **Adult Social Care:** Concerns regarding an adult's safety, care, or support needs can be raised directly with Oxfordshire County Council Adult Social Care.

9.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

- Gather as much detail as you can.
- Record on CPOMS
- Where possible, speak to the DSL first to agree a course of action.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team, the trust DSM and/or take advice from the MASH.
- You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible. NSPCC
- Make a referral to local authority children's social care directly, if appropriate.
- Share any action taken with the DSL as soon as possible.

Early Help assessment

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

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

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

In Oxfordshire a strengths and needs assessment needs to be completed and shared with the Local Authority. This will be completed with parents to identify the needs of the family and the child

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible.

The local authority should make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Procedure for Referring to Early Help:
The identifying practitioner must initiate an Early Help Assessment (EHA) using the local Strengths and Needs Form. This tool maps out family strengths, risks, and required outcomes. Explicit parental consent is mandatory for all Early Help pathways.
https://www.oxfordshire.gov.uk/children-and-families/childrens-services/early-help-childrens-services

Escalation Procedure (No Response or Professional Disagreement)
If you submit an Early Help request, attempt to coordinate a plan, or raise a vulnerable child concern, and you face a complete lack of response, delay, or an active disagreement regarding thresholds, you must log and enact the OSCP RESOLVE Policy:
https://www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/resolving-professional-concerns-and-escalation/

9.5 If you have concerns about extremism
If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to your DSL first to agree on a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team, the Trust DSM and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate by calling the MASH. Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and Local Academy Board members can call to raise concerns about extremism

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

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

9.6 If you have concerns about mental health

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

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

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

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

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

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

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

9.7 Concerns about a staff member, supply teacher, trainee teacher, volunteer or contractor

If you have concerns about a member of staff (including any of the above), or an allegation is made about a member of staff (including any of the above) posing a risk of harm to children, speak to the headteacher/head of school as soon as possible. If the concerns/allegations are about the headteacher/head of school, speak to the chair of the RIB - Simon Terrington.

The headteacher/head of school / Chair of RIB will then follow the procedures in The Gallery Trust Allegations Management procedure.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher/head of school, report it directly to the Designated Safeguarding Manager for the Trust, Alison Cox, or local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Our schools that are early years providers will inform Ofsted of the allegation and actions taken, within the necessary timescale

9.8 Allegations of abuse made against other students

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

We also recognise the gendered nature of child-on-child abuse. However, in The Gallery Trust all our students are vulnerable due to their special needs, disabilities or health conditions. All child-on-child abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence
- Could put students in the school at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes including where generated by AI), which may include or be driven by misogyny/misandry

See individual schools Child on Child Abuse Policy for full details

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

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

- You must record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the student against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting students and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate students about appropriate behaviour and consent.
- Ensure students are able to easily and confidently report abuse using our reporting systems.
- Ensure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment

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

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, such as by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent the school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

9.9 Sharing of nudes and semi-nudes ('sexting')

This approach is based on guidance from the UK Council for Internet Safety and Department of Science, Innovation and Technology and Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK

Your responsibilities when responding to an incident

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

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).
- Delete the imagery or ask the student to delete it.
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will consider a review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. They will also consider a discussion with the school link LCSS worker. This will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s).
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the student (in most cases, images or videos should not be viewed).
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).

- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the students involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved).

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See Part 2 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their special educational needs).
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The imagery involves sexual acts and any student in the images or videos is under 13.
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the headteacher/head of school and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

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

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

Informing parents/carers

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

We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

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

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g., moving them out of classes with the victim, and the reason(s) behind any decision(s).
- We will think carefully about what information we provide about the other child involved,

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling 101 or 999 if the child is at immediate risk of harm.

Recording incidents

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

Curriculum coverage

Individual students SEND needs are considered and the curriculum is delivered at developmental appropriate levels, see individual schools RSHE policies for full details.

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality.
- The risk of damage to people's feelings and reputation.
- students also learn the strategies and skills needed to manage:
    - Specific requests or pressure to provide (or forward) such images
    - The receipt of such images
    - Working with our local schools' police officer about all of the above

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

9.10 Reporting systems for our students

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

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

To achieve this, we will:

- Ensure our children know that they can talk to staff to report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for students.
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback.

All staff have had training around listening to the students and what steps to take, in line with this policy, around taking action to act in the best interests of all our students.

All students will be reminded about the fact they can talk to any adult who they choose if they have concerns or information they need to share.

9.11 Strengths and Needs Assessment

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

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

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

The DSL will work closely with our LCSS and liaise with the link social worker that is allocated to our school.

9.12 Referral

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

If you make a referral directly you must tell the DSL as soon as possible.

The local MASH will make a decision about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. Further details about referrals to the Oxfordshire MASH can be found on the

OSCP website
https://www.oxfordshire.gov.uk/business/information-providers/multi-agency-safeguarding-hub

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Details of the MASH are above in the contacts table on page 4, if you feel a child is at risk of significant harm call the MASH to share all the information that you have.

Further guidance for staff can be accessed through What to do if you're worried a child is being abused - GOV.UK

9.13 Notifying parents or carers

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

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

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the Oxfordshire MASH, our LCSS team or the child's own social worker if they have one, before doing so.

We will act on the guidance that we are given from colleagues in social care or the police.

10. Online safety and the use of mobile technology including AI

10.1 Online safety and the use of mobile technology

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

To address this, The Gallery Trust aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- The schools in The Gallery Trust are mobile phone-free environments by default. See individual school Mobile Phone policies for full details
- 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 students about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim.
    - Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training or guidance 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.
    - Have a clear policy in place for students around the use of mobile phones in school.
    - Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
        - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when students are not present.
        - Staff will not take pictures or recordings of students on their personal phones or cameras.
- Make sure staff are 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 student is in breach of our policies on the acceptable use of the internet and mobile phones.

- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Have 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 overseen by Julia Hyde, with the support of Luke Franklin (School Business Manager) and IT support
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to the individual school's Online Safety Policy which you can find on their website.

10.2 Artificial intelligence (AI)

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

The Gallery Trust recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard students. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose students 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 Gallery Trust will treat any use of AI to access harmful content or bully students in line with this policy and the individual schools Anti-bullying, Behaviour and Online 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. The Gallery Trust requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

PART 2

1 Students with special educational needs, disabilities, or health issues

We recognise that all our students have special educational needs or disabilities (SEND) or certain health conditions and can face additional safeguarding challenges. We know they are three times more likely to be abused than their peers without such additional needs. Additional barriers can exist when recognising abuse 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.
- students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students.
- The potential for students with SEND 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.
- 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

The Gallery Trust 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.

All our staff read the EHCPs (Education Health Care Plans) for the students that they work directly with to ensure they have a good understanding of the additional needs of individual students. Our staff work hard to know our students, ensuring they are able to recognise and respond to any concerns or changes in behaviour that they identify.

Addition support can be accessed from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service:
- Find your local IAS service
- Oxfordshire

2 Students with medical conditions

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

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their

family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.
See individual school's Supporting Students with Medical Needs policy and The Gallery Trust Allergies Policy for full details

3 Young carers

The Gallery Trust 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

4 Students with a social worker

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

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

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

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

5 Children We Care For (CWCF)

We will ensure that staff have the skills, knowledge and understanding to keep CWCF and students who were CWCF 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 Head Teachers
- We have appointed a designated teacher, Rani Tandon (PSHE Lead) who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the Designated Teacher will:

- Work closely with the DSL (if they are not the DSL) to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how student premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

6. Students who are lesbian, gay or bisexual

The trust recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, students who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See individual schools Behaviour Policy for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL (or a DDSL if the DSL in unavailable)

7. Students who are questioning their gender

7.1 Supporting students who are questioning their gender

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

We will take a strong, proactive stance on all forms of bullying based on gender. See individual school's Behaviour Policy for more detail.

The Gallery Trust will ensure that children and their families are aware that, while the trust will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, we are conscious of the rights of students and staff in relation to their religion or belief.

When supporting a student questioning their gender, we will take into account the principle of taking a careful approach.

The DSL will lead in these cases

7.2 Involving parents/carers in cases of students questioning their gender

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

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

Where a student 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.

7.3 Considering requests for support with social transition

The Gallery Trust will not initiate any action regarding social transition. However, when a student or their parent/carer requests that the individual school makes changes or puts support in place to facilitate the student 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 with support when necessary from The Gallery Trust Central services team and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education).

In making decisions about supporting social transition, The Gallery Trust 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 Gallery Trust will make decisions in line with the following principles:

- The Gallery Trust 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 individual 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 individual school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

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

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

7.4 Rules on single-sex spaces

Students are not allowed into toilets, changing rooms, showers or designated areas for the opposite biological sex, with no exceptions

7.5 Rules on single sex sports

Individual schools 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 individual 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, or developmental age, to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and students must not be allowed to participate in sports designed for the opposite sex.

Part 3: Complaints and concerns about school safeguarding policies

1.1 Complaints against staff

It is important to recognise the difference between a complaint and an allegation. If an allegation is made this will be referred to the LADO in line with our Allegations Management Policy (see more details in section 3)

1.2 Other complaints

All complaints will be taken seriously and will be dealt with in line with our Complaints Procedure

1.3 Confidential reporting (Whistleblowing)

The Gallery Trust has a specific Confidential Reporting Policy. This policy covers concerns regarding the way The Gallery Trust and its schools safeguards students – including poor or unsafe practice, or potential failures

If you would prefer to raise your concerns outside of the school then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or email https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/ or make contact with Oxfordshire County Council.

If you believe that a member of the school staff is harming a child and that this has been reported to the headteacher and no or insufficient action has been taken, or the member of staff you have concerns about is the headteacher, then you are able to contact the LADO team on 01865 810603 or email lado.safeguarding@oxfordshire.gov.uk

Record-keeping

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

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Our staff will undergo training on recording information.

Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.

Concerns and referrals will be kept on our electronic safeguarding system CPOMS.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained until the child is 24, unless there are reasonable grounds to justify retaining them for a longer period of time after they have left school, for example on an ongoing enquiry, part of an allegation in relation to a staff member. The DSL or Head Teacher can seek support from The Trust Designated Safeguarding Manager in relation to these decisions.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

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

Part 4 Training

4.1 All staff

All staff members will undertake safeguarding and child protection training at induction, which will include a focus on confidential reporting procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

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

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

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

Volunteers will receive appropriate training, if applicable.

All staff will receive annual training focusing on the relevant updates in Keeping Children Safe In Education

Our schools that have early years settings will ensure at least half of all other staff must hold at least an approved level 2 qualification. We will make sure that children are adequately supervised, especially whilst eating, and decide how to use staff to ensure children's needs are met. We will inform parents and/or carers about how staff are organised, and, when relevant and practical, aim to involve them in these decisions. Children will usually be within both sight and hearing of staff and always within sight or hearing.

All staff in early years settings who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues

Supervision is available to all staff, but may be offered as part of team meetings

4.2 The DSL and Deputy DSL(s)

The DSL and Deputy DSL(s) will undertake level 3 child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, attending The Gallery Trust DSL forums, attending conferences or external forums, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

4.3 Trustees

Trustees and local board members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

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

As the chair of trustees/local school board may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher/head of school, they receive training in managing allegations for this purpose.

4.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

4.5 Training table

Type of training	Staff/volunteers	Requirement to update
Generalist level safeguarding training	All	Every 3 years is the statutory requirement but there should be at least annual updates
DSL training	DSL and DDSL's	2 years elearning through the OSCP and an inhouse face to face training session
Lead Trainer training	DSL and any DDSL's who are going to lead the generalist training	No requirement
Safer recruitment training	Members of SLT, LAB's and Trustees All recruitment panels	Every 5 years

	must have at least one member who is safer recruitment trained	
PREVENT training	All	This is part of safeguarding training There should be an annual update on PREVENT

Links with other policies

This policy links to the following policies and procedures:

- Behaviour policy
- Staff Code of Conduct
- Complaints Policy
- Health and Safety Policy
- Attendance policy
- Online Safety, including use of mobile phones
- Relationships, sex and Healtheducation policy
- First Aid policy
- Confidential Reporting
- Mobile phone policy
- First Aid Policy
- Students with Medical Needs Policy
- Anti-bullying Policy

- Equality statement
- Designated Teacher for CWCF

Part 5 - Appendices

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: Types of Abuse

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

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

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

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

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

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

- Physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse

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

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

Appendix 2: Specific Safeguarding Issues

This appendix is mostly based on the advice in Keeping Children Safe in Education (KCSIE) 2026), in particular part 1

Part 1 also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime. Please refer to KCSIE if you would like to read more details on these areas

1. Assessing adult-involved nude and semi-nude sharing incidents

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

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

1.2 Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform

- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

1.3 Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

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

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

2. Children who are absent from education and missing children

2.1 Children who are absent from education

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk of becoming missing from education. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families
- Children who are being exploited

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Our schools that have EYFS settings will ensure that if a student is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an

immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

2.2 Missing children/children who have unexplainable and/or persistent absences from education

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

All our staff are aware that children being absent from school , particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, socalled 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. All our staff are aware of our schools absence procedures and children absent from education education procedures.

Further information and support includes:

- Guidance on school attendance Working together to improve school attendance - GOV.UK including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education Statutory Guidance for Local Authorities September 2016 .
- further information for colleges providing education for a child of compulsory school age can be found in: Full-time enrolment of 14 to 16-year-olds in further education and sixth-form colleges: 2023 to 2024 academic year - GOV.UK
- general information and advice for schools and colleges can be found in the Government's Missing Children and Adults - A cross government strategy

3. Child Exploitation

Tackling Child Exploitation – is the non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice

3.1 Child Criminal exploitation (CCE)

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into

criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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

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.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

3.2 Child sexual exploitation (CSE)

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: https://assets.publishing.service.gov.uk/media/5a7f8e3640f0b62305b87dbc/CSE_Guidance_Core_Document_13.02.2017.pdf and Preventing Child Sexual Exploitation | The Children's Society

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

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

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

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

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Discriminatory behaviour (including racism, faith-targeted abuse, and other prejudice-based incidents)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')

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

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set, speaking to the DSL in the first instance.

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

5. County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, student referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network

6. Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

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

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

Police must notify a school/education setting 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 by 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.

7. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

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

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care. Where children are living independently from their parent/carers

(e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

8. So-called 'honour-based' abuse (including FGM and forced marriage)

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

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

8. Female Genital Mutilation (FGM)

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Part 1 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/student already being known to social services in relation to other safeguarding issues.
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider).
- FGM being known to be practised in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion).
    - Being unexpectedly absent from school.
    - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

9. Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e., we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

- Speak to the student about the concerns in a secure and private place.

- Activate the OSCP procedures and refer the case to the local authority's designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

10. Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech

- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Further information on the individual school's measures to prevent radicalisation are set out in other school policies and procedures, including curriculum planning.

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

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

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

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

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

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

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

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

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

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in Part 1

11.2 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 group
- 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 student being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

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

Appendix 3: Other information

1. **The Role of the Appropriate Adult**

How the Police conduct themselves when a person is detained and / or questioned is covered by the Police and Criminal Evidence Act 1984 (PACE) Code C. In paragraph 1.7 the PACE guidance advises that "The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons". Our role as an appropriate adult is to observe that the police are acting properly and fairly in relation to a vulnerable detained person's rights and entitlements, as well as helping the detained person understand their rights.

Equally important is that if the AA considers that the rights of the detained person are not being respected, or the police are not acting properly in their dealings with a detained person, the AA must act to protect the child and raise their concerns by speaking to an officer of the "rank of inspector or above". This therefore means that if the AA is not happy about something there is clear recourse to a senior officer who can then review and determine what steps should be taken. The active nature of the AA role is reinforced in Home Office Guidance for Appropriate Adults, which states that the AA is not just an observer. It is crucial that we ensure that the appropriate staff member is identified to be the AA, it needs to be someone that has the confidence to be able to escalate concerns in this way. The Headteacher should always ensure the right staff member is identified to be the AA, advice can be taken from the Trust DSM.

Safeguarding is therefore inherent within the AA role – this could be as basic as an AA reviewing the custody record of the young person that has been detained to check that they have been given regular opportunities to access food and drinks, and to have appropriate breaks. It is expected that the AA will support the young person to understand what is being said to them, allowing them to participate fully in the process. This is especially crucial for the children in our schools. The staff member must know the child well and have a clear understanding of their additional needs and their EHCP.

For anyone requiring an AA, this can be a crucial part of the role with many people – Children and young people can default to giving a "yes" or "no" answer, this could be for various reasons:

- They may look for what they see is the quickest and easiest route out of the predicament they find themselves in.
- They may give the answer they think the adult wants to hear
- They may not understand what is being asked of them.

The role of AA is therefore a vital and powerful role for children and vulnerable people when detained by the police.

See our full guidance Safeguarding and the role of the appropriate adult

2. Use of alternative provision

There may be occasions where our school places a student with an alternative provision provider, we recognise we continue to be responsible for the safeguarding of that student and ensure that we are satisfied that the placement meets the student's needs.

If we place one of our students in an alternative provision, we recognise the importance of ensuring that governing bodies and proprietors of these settings are aware of the complex needs of our student and the additional risk of harm that our student may be vulnerable to. We quality assurance the placement before a student commences.

The department has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard:

- Alternative provision - GOV.UK and
- Education for children with health needs who cannot attend school - GOV.UK

3. Use of school or college premises for non-school activities

If our school premises/premises are hired or rented out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we ensure that appropriate arrangements are in place to keep children safe.

We will work to the guidance Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings - GOV.UK Keeping children safe in out-of-school settings details the safeguarding arrangements that we will expect these providers to have in place.

This includes ensuring the external organisation understands that if any allegations are made against any of their staff or volunteers, they must inform us so we can be assured that the correct procedures have been followed in line with our allegations management policy, KCSIE and our local OSCP and OCC procedures.

4. Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff during their visit, and will leave their mobile phones in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in and wear a visitor's badge.

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 that confirms their identity and the organisation they work for and:

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

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

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 students or staff.

Appendix 4: Safer recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- The Gallery Trust's commitment to safeguarding and promoting the welfare of children.
- That safeguarding checks will be undertaken.
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children.
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

Application forms

Our online application process will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people (1 will always have been safer recruitment trained) and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them.
- Explore all potential concerns.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list

  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - If they are known to the police and children's local authority social care
  - If they have been disqualified from providing childcare
  - Any relevant overseas information
  - If there is anything that could affect their suitability to work with children (including information online)

- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before the interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references (for example, "To whom it may concern")
- Not rely on applicants to obtain their reference
- Not accept references from a family member
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. If the applicant has never worked with children, then ensure a reference is from their current employer, training provider or education setting
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify where information is vague or insufficient information is provided
- Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this.
- Explore any potential areas of concern to determine the candidate's suitability to work with children.
- Record all information considered and decisions made

Pre-appointment vetting checks

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

New staff

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

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

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

For our early years providers: Where required by the relevant legislation: We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity is work that a barred person must not do. It means a person who will be:

Activity	**Frequency**
• Teaching, training, instructing, caring for, or supervising children • Providing advice or guidance on physical, emotional or educational wellbeing • (For paid workers) Doing any other paid work in school that provides an opportunity for contact with children	• Frequently (once a week or more), or • On more than 3 days in a 30-day period, or • Once at any time between 2am and 6am and with opportunity to have face-to-face contact with children
• Driving a vehicle only for children and their carers or supervisors	• Frequently (once a week or more), or • On more than 3 days in a 30-day period, or
Providing intimate or personal care, including: • Assisting with toileting, washing, bathing and dressing due to a child's age, illness or disability • Assisting with eating and drinking due to illness or disability • Providing health care (physical or mental health)	• Any time, even if only once
Moderating a public electronic interactive communication service (e.g. the school's social media platforms) which is likely to be used wholly or mainly by children	• Any time

The above applies to both paid staff and volunteers, aside from where stated '(For paid workers only)'.

Existing staff and volunteers

In certain circumstances we will carry out all the relevant checks on existing staff or volunteers as if the individual was a new member of staff or a new volunteer. These circumstances are when:

- There are concerns about an existing member of staff's or the volunteer's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

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

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

Agency and third-party staff

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

Contractors

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

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

We will obtain the DBS check for self-employed contractors, or request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school.

We will not keep copies of such checks for longer than 6 months.

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

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

For schools in The Gallery Trust who have students under 8: Where required by the relevant legislation: For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

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

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

For schools in The Gallery Trust who have students under 8: Where required by the relevant legislation: In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- For any existing volunteer who is considered to be engaging in a regulated activity from 1 September 2026:
    - Obtain an enhanced DBS check with children's barred list information; or
    - Obtain a standalone barred list check where:
        - We wish to allow the volunteer to undertake regulated activity prior to obtaining the enhanced DBS check certificate; or
        - We have recently obtained an enhanced DBS check without children's barred list information, and there has been no break in service since that certificate was issued

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Volunteers will not be permitted to begin volunteering in our EYFS provision until we have received the applicant's enhanced DBS certificate including barred list information.

For schools in The Gallery Trust who have students under 8:

- Where required by the relevant legislation: Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Trustees, members and local boards

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

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

The chair of the board will have their DBS check countersigned by the secretary of state.

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

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008)
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a student with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise students on work experience

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

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