

Author	Owen Walters	Target group	All employees, consultants and volunteers
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## Child Protection and Safeguarding Policy

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## Introduction and context

Anthem Schools Trust and Oxford Spires Academy fully recognises its statutory responsibilities for Child Protection and Safeguarding. It is committed to promoting the welfare of children and young people and expect all staff and volunteers to share this commitment and be appropriately trained.

This is a statutory policy and is on every Anthem school website. The policy is based on an Anthem wide template but adapted to local context for every Anthem school.

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## Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education](#) September 2025, [Working Together to Safeguard Children 2023](#), and the [Academy Trust Governance Guide](#). We comply with this guidance and the procedures set out by our local safeguarding partnership.

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
- The 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, 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 governors and headteacher should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of students (where we can show it's proportionate). This includes a 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

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## Scope and publication

Safeguarding and child protection is everyone's responsibility and as such this policy applies to all staff (including agency staff), Trustees, ACC members, national team staff and volunteers working in each school and applies wherever staff or volunteers are working with students even where this is away from the school, for example at an activity centre or on an educational visit. This policy is published on the school's website and can also be made available in large print or another accessible format if required.

The Trustees will facilitate a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

The Trustees take seriously their responsibility under Section 175 of the Education Act 2002 and are aware of their obligations in relation to the legislation and statutory guidance above to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our schools to identify, assess and support those children who are suffering harm.

### **The DfE defines safeguarding and promoting the welfare of children as:**

- 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.

Children includes everyone under the age of 18.

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect **specific** children who are suffering, or are likely to suffer, significant harm.

Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

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## Principles

The school has a statutory duty to promote and safeguard the welfare of children and have due regard to guidance issued by the Department for Education. This school recognises its legal and moral duty to promote the wellbeing of children, protect them from maltreatment, and respond to

child abuse, as well as its responsibility to follow the local inter-agency procedures of Oxfordshire County Council

Safeguarding Multi-agency Partnership (MAP: the multi-agency partnership consists of three member groups – the Police, the integrated care boards and the Local Authority Social Care. These have been established from September 2019.

We recognise the importance of a whole school approach to safeguarding and child protection; all systems, processes and policies should operate with the best interests of the child at their heart and in accordance with local procedures. We believe that every child, regardless of age, has at all times and in all situations a right to feel safe and protected from any situation or practice which results in a child being physically or psychologically damaged. We believe that children must receive the right help at the right time to address risks and prevent issues escalating.

We believe that children have the right to have their views heard and considered by all professionals when making decisions to keep the child safe from harm. We will actively enable and encourage children to participate in an open dialogue with all school stakeholders about safeguarding matters and include them in decisions about safeguarding practices, developing an inclusive and open ethos to keeping them safe.

We agree that we have a primary responsibility for the care, welfare and safety of the students in our charge, and we will carry out this duty through our teaching and learning, extra-curricular activities, pastoral care and extended school activities. We will teach about safeguarding, including keeping safe online, as part of providing a broad and balanced curriculum covering relevant issues through personal, social health and economic education/RSHE and teach children to recognise when they are at risk and how to get help when they need it.

We additionally understand that as a school we 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, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our Behaviour & Ethos Policy, pastoral system and as above, our inclusive and regularly delivered RSHE curriculum.

We always maintain an attitude of 'it could happen here'. When we have concerns about the welfare of a child, staff will always act in the best interest of the child and will raise these with the school's DSL. In exceptional circumstances, such as in an emergency or a when a genuine concern has not been appropriately acted upon, staff members will speak directly to children's social care.

The school seeks to adopt an open and accepting attitude towards children as part of their responsibility for pastoral care. The school hopes that parents/carers and children will feel free to talk about any concerns and will see school as a safe place if there are any difficulties at home.

We recognise that a child who is abused or who witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal, to aggressive or withdrawn.

Every complaint or suspicion of abuse from within or outside the school will be taken seriously and will be referred to an external agency such as children's social care services, the Local Authority Designated Officer (LADO), police or the NSPCC, by the school, as appropriate and in line with this

policy. (The appropriate person(s) only (Headteacher and/or DSL or deputy DSL or Head of Safeguarding) will have completed the relevant information gathering and due consideration process appropriate to their level of skill and expertise, prior to seeking further advice or making a referral.)

The LA children's social care services, LADO and NSPCC contact details will be displayed throughout the school for ease of reference for the school community and children.

The name of the school's DSL and their Deputy will be clearly advertised throughout the school, with a statement explaining the school's role in referral and monitoring.

The name of the Anthem Executive Director of Education will be clearly displayed in the school office for school staff.

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## Equality statement

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

### We give special consideration to children who:

- Have special educational needs or disabilities or certain health conditions.
- Those who are educationally disadvantaged.
- Are young carers.
- Are looked-after or previously looked after.
- Are cared for under a kinship arrangement.
- 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 abuse.
- Are at risk of honour-based abuse including FGM and/or forced marriage, sexual exploitation, or radicalisation.
- Appear vulnerable to criminal exploitation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are missing or absent from education for prolonged periods and/or repeat occasions.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

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## Key staff

### School Designated Safeguarding Lead (DSL)

The school has appointed a Designated Safeguarding Lead (DSL) from the senior leadership team in accordance with KCSIE September 2025 guidance.

**The DSL (under the Headteacher) is responsible for matters relating to child protection and welfare in this school:**

Shelley Baker (Designated Safeguarding Lead)

[safeguarding@oxfordspires.anthemtrust.uk](mailto:safeguarding@oxfordspires.anthemtrust.uk) / 01865 428200

**In their absence, these matters will be dealt with by the Deputy Designated Safeguarding Lead:**

Rebecca Henry (DDSL) and Sydnee Richardson (DDSL)

[safeguarding@oxfordspires.anthemtrust.uk](mailto:safeguarding@oxfordspires.anthemtrust.uk) / 01865 428200

The DSL is key to ensuring that proper child protection and safeguarding procedures and policies are in place and adhered to. They will also act as a dedicated resource available for other staff, volunteers and Anthem Community Council (ACC) Members to draw upon. Parents/Carers are welcome to approach the DSL if they have any concerns about the welfare of any child in the school, whether these concerns relate to their child or any other. The DSL will liaise with the Local Authority and work with other agencies in line with statutory guidance *Working Together to Safeguard Children, 2023* and *Keeping Children Safe in Education, September 2025*.

There will always be cover for this role and arrangements for this are as follows:

When the DSL is off site, absent or unavailable, staff can contact the Deputy DSL as above, or The Headteacher (Louise Cowley) / Deputy Headteacher (Maurice Dixon) who also have DSL training.

### LA Child Protection and Safeguarding

LA children's social care: Oxfordshire Safeguarding Children Partnership (OSCP)

LA designated officer(s): Jo Lloyd – 01865 810603

LA Channel Panel: Oxfordshire Channel – 0345 050 7666

### Looked-After Children

**The Designated Teacher for Looked-After Children (DLAC) is:**

Sarah Bhatti – [Sbhatti@oxfordspires.anthemtrust.uk](mailto:Sbhatti@oxfordspires.anthemtrust.uk)

The DLAC has received appropriate training in accordance with the latest statutory guidance.

The DLAC will liaise with the Virtual Head for Looked-After Children to ensure that the funding assigned to the child/young person is put to best use. The role will also encompass the needs of post-LAC students. The arrangements for covering this role should the DLAC be absent or unavailable are as follows:

In the absence of the DLAC, please contact the deputy - [MYusof@oxfordspires.anthemtrust.uk](mailto:MYusof@oxfordspires.anthemtrust.uk)

## **Anthem contacts**

Executive team member with responsibility for safeguarding:

Executive Director of Professional Services and General Counsel: Claire Pannell

Executive Director of Education: Elma Lawson

Head of Safeguarding: Owen Walters

## **Roles and responsibilities**

### **All staff and volunteers (including school staff, national team staff, Trustees and ACC members)**

All staff and volunteers will safeguard children's wellbeing and promote their welfare: protecting them from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and by taking appropriate action to enable all children to have the best outcomes.

All staff and volunteers must read Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [\*Keeping Children Safe in Education September 2025\*](#), and review this guidance at least annually. It is a recommendation from Anthem Schools Trust that all staff and volunteers also read Part 5.

All staff and volunteers will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

Trustees, Executive Team members, the Head of Safeguarding, members of the School Leadership Teams, DSLs and their deputies, ACC Safeguarding Champion, and members of the National Team should read the document in its entirety.

All staff and volunteers will be aware of:

- Our systems which support safeguarding, including this child protection policy (including procedures for dealing with child-on-child abuse), the relevant Code of Conduct, the role and identity of the DSL and deputy/deputies, the E-safety policy which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, the Behaviour & Ethos Policy, and the safeguarding response to children who go missing from education.
- The early help 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.
- 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 and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), Domestic Abuse, indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).

- Mental Health problems and how in some cases they are an indicator of the child being at risk of harm.
- The terms victim and perpetrator ensuring they recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way thus using a term that the child is comfortable with; equally for alleged perpetrator(s)/perpetrators thinking carefully about what terminology is used (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. (As a school we will decide what's appropriate and which terms to use on a case-by-case basis).
- 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 children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children and thus will provide a safe space for these students to speak out and share their concerns.
- What to look for to identify children who need help or protection.

All new staff and volunteers will receive basic safeguarding training as part of their induction and be expected to read and understand the Child Protection and Safeguarding Policy.

The section on training and the appendix of this policy outline in more detail how staff and volunteers are supported to do this.

## DSL

The DSL is a member of the senior leadership team. As set out above, our DSL is Shelley Baker. 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.

When the DSL is absent, the deputy – Rebecca Henry – will act as cover.

If the DSL and deputy are not available, Louise Cowley (Headteacher) will act as cover (for example, during out-of-hours/out-of-term activities).

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.
- The DSL will actively challenge decisions made by professionals or agencies where the DSL believes a child remains at risk. This includes use of the local escalation or professional disagreement protocols.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, 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.
- The DSL will also:
  - Keep the Headteacher and the Head of Safeguarding informed of any issues, in line with the Escalation Checklist.
  - Liaise regularly with the ACC Safeguarding Champion.
  - Attend regularly and contribute to the Anthem DSL forums.
  - Prepare for and support the termly safeguarding Deep Dives and the biannual external safeguarding audit.
- 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.

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

The DSL and their deputy must undertake child protection training and training in inter-agency working every two years (or more regularly) and will attend annual refreshers provided by the LA/MAP to remain updated on policy, procedures and developing concerns nationally and regionally.

## The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction; and
- 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 and volunteers undertake appropriate safeguarding and child protection training, including online safety training, and updating the content of the training regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate. Making decisions regarding all low-level

concerns, though they may wish to collaborate with the DSL and/or Head of Safeguarding on this.

- Ensuring the relevant staffing ratios are met, where applicable.
- Ensuring the school has at least two emergency contact details for each student.

## Head of Safeguarding

The Head of Safeguarding is tasked with overseeing safeguarding practice across all of Anthem's schools. The Anthem Head of Safeguarding:

- Offers support, guidance and training to DSLs, DDSLs and Headteachers on all safeguarding matters.
- Provides oversight and support with more serious safeguarding matters, including Significant Safeguarding Incidents, as set out in the Escalation Checklist.
- Monitors CPOMS and BromCom safeguarding data across all Anthem schools.
- Conducts termly safeguarding Deep Dives at every school.
- Maintains the safeguarding dashboard and monitors and reports on trust wide safeguarding data to the Director of Education (North & South) and Anthem executive team and aids reporting to Trustees.
- Runs termly DSL forums.
- Supports with the ACC Safeguarding Champion forum.
- Keeps this Child protection and Safeguarding policy under review and carries out an annual update.
- Provides safeguarding training for all staff and volunteers.
- Keeps up to date on all safeguarding legislation, guidance and best practice and disseminates this to all staff and volunteers as required.

## Anthem Executive Director of Professional Services and General Counsel

The Executive Director of Professional Services and General Counsel:

- Maintains executive oversight of Trust-wide safeguarding data, risks, processes and systems.
- Consults on and sets the Anthem safeguarding strategy, keeping this under review and refining processes and procedures as required.
- Oversees the internal Deep Dive and external safeguarding audit processes.
- Ensures safeguarding is considered and prioritised at every level of governance across Anthem.
- Monitors and analyses Trust-wide safeguarding data, with the support of the Head of Safeguarding, and reports this to Trustees.

## ACC Safeguarding Champion

The ACC Safeguarding Champion is responsible for ensuring that safeguarding is at the forefront of everyone's minds in all the work that the ACCs do. The ACC Safeguarding Champion will:

- Be familiar with the school's policy, procedures and reported data in relation to child protection, safeguarding and wellbeing.

- Meet with the DSL once a term to check in, support with the Anthem Safeguarding Deep Dive actions and act as a sounding board for the DSL.
- Act as a link between the DSL and the ACC.
- At ACC meetings, keep safeguarding at the forefront of the ACC's collective mind as matters are discussed and remind others of how those matters might impact the safety and wellbeing of students.
- Ask the DSL, Headteacher and Head of Safeguarding questions about the status of actions arising from the internal safeguarding deep dives and external audits of safeguarding at their school.
- Raise any concerns they may have about safeguarding in line with the school's Child Protection and Safeguarding Policy as appropriate. Refer other people to this policy as appropriate.
- Encourage ACC colleagues to recognise and be aware of safeguarding issues at all times.
- Suggest further advice is sought from the DSL or Head of Safeguarding where appropriate.

ACC Safeguarding Champions are not expected to be experts in safeguarding, nor do they hold any formal or legal responsibility for safeguarding practice in the school. Specifically, they are not responsible for the following:

- Responding to queries about safeguarding at the school.
- Directly investigating or making enquiries into safeguarding matters.
- Checking the Single Central Register.
- Conducting safeguarding audits at the school.
- Signing off any safeguarding-related policies or documents.
- Representing the school or the Trust during an Ofsted inspection.

Further detail about the ACC Safeguarding Champion role is set out within the [ACC Safeguarding Champion Role Description](#).

## Trustee Safeguarding Champion

The Trustee Safeguarding Champion is responsible for ensuring that the Trust and its schools create safe environments for adults and students through robust safeguarding practices. Specific tasks include:

- Ensuring the Board is knowledgeable about the safeguarding policies and procedures that should be in place and kept up to date and that it provides effective challenge to the Trust in this regard.
- Maintaining awareness of DfE requirements in relation to safeguarding and communicating these to the Board as appropriate.
- Linking with the Executive Director of Professional Services and General Counsel who leads the safeguarding network and oversees the Trust Safeguarding Strategy.
- Oversight of the Anthem Safeguarding Dashboard and reporting back to the Board the summary RAG ratings for each school.
- Oversight of the External Trust Safeguarding Audit process (every 3 years) and reporting back to the Board the outcomes.

- Providing appropriate scrutiny, support and challenge to the Trust's Safeguarding Strategy development and progress.
- Occasionally visiting schools to observe at first hand their safeguarding provision.
- Ensuring that Board members are aware of, and that they access, online and other safeguarding training where it is a statutory requirement or where it is beneficial to individuals and the Board as a whole.

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## **Additional contact information**

### **NSPCC helplines**

Main contact: 0808 800 5000 ([help@nspcc.org.uk](mailto:help@nspcc.org.uk))

ChildLine: 0800 1111

FGM direct line: 0800 028 3550

Gangs direct line: 0808 800 5000

Whistleblowing advice line: 0800 028 0285

### **Forced Marriage Unit**

020 70080151 ([fm@fco.gov.uk](mailto:fm@fco.gov.uk))

### **Tackling Extremism and Radicalisation (Prevent)**

[counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)

020 7340 7264

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## Recognising and responding to safeguarding concerns

### Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- 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
- Is suffering from mental ill health
- 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
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff (including temporary staff) and volunteers must follow the procedures set out below in the event of a safeguarding issue.

Where a staff member or volunteer has a concern and the DSL or DDSL cannot be located or where the staff member feels the response from the DSL/DDSL is inadequate, the staff member **MUST** refer the case into Social Care using the processes and procedures below.

### If a child is in immediate danger

Make a referral to children's social care 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.**

Tell the DSL as soon as possible if you make a referral directly.

If, a child is in immediate danger or at risk of harm a referral should be made immediately to the Multi Agency Safeguarding Hub (MASH) on 0345 050 7666 and/or the police on 101/999 immediately. Outside MASH opening times and on bank holidays, a referral can be made to the Emergency Duty Team (EDT) on 0800 833408. EDT can only respond to emergencies that cannot wait until the next working day.

MASH opening hours - Monday – Thursday – 8.30am-5pm, Fri – 8.30am-4pm

Further information on how concerns can be reported can be found here:

<https://www.gov.uk/report-child-abuse-to-local-council>

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## **If a child makes a statement or allegation of abuse to you**

### **If a child discloses a safeguarding issue to you, you should:**

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- 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. Reassure them that you are taking their statement or allegation of abuse seriously, will help keep them safe and that they are not creating a problem for reporting abuse, sexual violence or sexual harassment.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up 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. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record and any evidence must be shared with the DSL as soon as possible.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible 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.

## **Action by the Designated Safeguarding Lead – concerns about students**

### **The action to be taken by the DSL will take into account:**

- The local inter-agency procedures of the Oxfordshire Safeguarding Partnership.

- The nature and seriousness of the suspicion or allegation. An allegation involving a serious criminal offence will always be referred to children's social care or the Police. In case of serious harm, the Police will be informed from the outset.
- The wishes of the student who has made the allegation, provided that the student is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a student's wishes.
- The wishes of the student's parents /carers provided they have no interest which is in conflict with the student's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the DSL is concerned that disclosing information to parents/carers would put a child at risk; s/he will take further advice from the relevant professionals before making a decision to disclose; and
- Duties of confidentiality, so far as applicable (and as referenced above)

## Referral

If there is room for doubt as to whether a referral should be made, the DSL may consult with children's social care services on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, the DSL will make a referral without delay. If the initial referral is made by telephone, the DSL will confirm the referral in writing to children's social care services within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact children's social care services again. Should the school require further support in escalating the case then they will contact the Head of Safeguarding.

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## Reporting and recording

It is the responsibility of all adults in school to ensure that any safeguarding concerns they may have are reported to the DSL in school.

All staff are required to record any concerns on CPOMS at the earliest opportunity, and no later than the end of the same working day.

Any urgent concerns, where a child might be at risk of significant or immediate harm must be reported immediately to the DSL (or in their absence the DDSL) and then reported in writing onto CPOMS as soon as possible within the same day or as directed by the DSL on that occasion.

All reports will include complete details of the child, any others involved and of the incident. All names will be written in full, and all people mentioned will be given their designation (i.e. 'Fred, father of John'). As much as possible the language used by the child/student in any statement or allegation of abuse, will be reported and not substituted by the adult reporting.

The report will be considered a formal document and so all details must be clear so that, if referenced at a later stage, the person reading it has a clear understanding of who is involved and what occurred and the rationale for any decisions made.

Reports may be submitted as part of legal proceedings.

Where a student has such a file, this will be indicated on their general student file.

Next steps for the concern will be followed up by the DSL and DDSL. (See referral procedures.)Record-keeping

We will hold records in line with our Retaining Records Policy.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded on CPOMS. This should include instances where referrals were or were not made to another agency such as 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.

### **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.

Non-confidential records will be easily 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.

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:

- Five days for an in-year transfer.

or

- Within the first five 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.

Concerns and referrals will be kept in a separate child protection file for each child.

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## **Confidentiality and information sharing**

Timely information sharing is essential to effective safeguarding.

The Data Protection Act 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe except in circumstances where damage may be done to a person or group of people; 'this includes allowing practitioners to share information without consent...' (KCSIE Sept 2025 paragraph 118). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and where appropriate the school will seek advice from Anthem Trust.

The school will ensure that all child protection records are kept confidential and only allow disclosure to those who need the information in order to safeguard and promote the welfare of children. The school will cooperate with police and children's social services to ensure that all relevant information is shared for the purposes of child protection investigations.

Regardless of any duty of confidentiality, if any member of staff has reason to believe that a child may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the DSL (who in turn will refer immediately to the local authority children’s social care) in accordance with this policy. All staff may raise concerns directly with children’s social care services.

## Flowchart for procedures if you have concerns about a student’s welfare



**(no immediate danger)**

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## Significant Safeguarding Incident (SSI)

To ensure that appropriate action has been taken by schools following a Significant Safeguarding Incident (SSI), the school must follow the SSI process. This concept has been developed to ensure that high risk safeguarding concerns are appropriately reviewed by Anthem Schools Trust and shared in line with information sharing expectations and trust communication expectations.

An SSI may consist of the following:

- Any immediate child protection concerns (i.e. where police must be called or an emergency referral to Children's Social Care via telephone must be completed)
- Sexual Abuse Allegations
- Reference to suicide or attempted suicide (student or parent/carer)
- High Risk FGM
- High Risk Prevent
- Significant Police Incident (i.e. weapon/illegal drugs/hate crime)
- Student pregnancy
- Where a student has been reported missing

The Head of Safeguarding must be notified of any Significant Safeguarding Incident (SSI) via the CPOMS 'SSI' category. This ensures immediate oversight and guidance from the Head of Safeguarding. The school safeguarding team should cooperate with follow-up requests to confirm the steps taken and resolution reached.

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## Early help

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.

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## 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 2 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 disclose, they should also discuss the case with the DSL and involve 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.

If, a child is in immediate danger or at risk of harm a referral should be made immediately to the Multi Agency Safeguarding Hub (MASH) on 0345 050 7666 and/or the police on 101/999 immediately

## **If you have concerns about a child (as opposed to a child being in immediate danger)**

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger on page 25.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).

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 and/or take advice from local authority children's social care. You can also seek advice at any time from the Anthem Head of Safeguarding or the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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## **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 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 and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). 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 DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and ACC members can call to raise concerns about extremism with respect to a student. You can also email [counter.extremism@education.gov.uk](mailto: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

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## Reporting systems for our students

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:

- Have systems in place for students to confidently report abuse.
- Promote our reporting systems and ensure they are easily understood and are 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 students are supported through a structured year system. Students may raise concerns directly with their Head of Year or Year Team Support Manager. In addition, a dedicated Safeguarding Team is available to provide guidance and support. For those who prefer to report concerns anonymously, a “Whisper Box” is located near the library, and a “Whisper Button” is available on the student portal. Reporting options are explained to students during assemblies at the start of the academic year and are reinforced regularly through assemblies and character development lessons.
- The school also operates a “Trusted Adult” scheme, enabling students to identify a member of staff with whom they feel comfortable seeking advice or support. When a disclosure is made, staff will explain to the student the necessary next steps. This may involve sharing information with designated staff members and, where appropriate, external agencies such as social care services or the police. In all circumstances, the safety and wellbeing of students remain the highest priority.
- All staff members receive training on handling disclosures and are committed to taking every concern seriously. Staff provide reassurance and support to students throughout the reporting and safeguarding process.

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## Home visits

Home visits may be carried out as part of early help, attendance and absence monitoring, welfare checks, or when there are safeguarding concerns. All home visits are risk assessed in advance, recorded, and conducted by staff in line with the school's safeguarding procedures and Anthem guidance.

Where possible, home visits will be pre-arranged. Staff conducting home visits must follow the Home Visits policy and the guidance set out in the Anthem Schools Trust Safeguarding Handbook (June 2025) and Anthem Attendance Ambitions document, ensure their visit is logged on CPOMS, and inform the DSL of any safeguarding concerns arising from the visit.

All staff must remember that the same safeguarding responsibilities apply during home visits as on school premises.

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## 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 will make a decision within one 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 contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

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## If you have a concern about mental health

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

Staff will be alert to behavioural signs that suggest a student may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a student that is also a safeguarding concern, take immediate action by following the steps above.

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

Any concerns that staff may have relating to student's mental health will be recorded on CPOMS. These concerns will be addressed with the parent/carer where appropriate and referrals made to mental health support services if required. Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

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## Vulnerable groups and specific safeguarding issues

### Children with special educational needs, disabilities or certain health conditions

We recognise that students with Special Educational Needs (SEN) or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. 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 student'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 SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these students. This includes:

Oxford Spires Academy is committed to providing additional support for vulnerable students to ensure that their academic, social, and emotional needs are met. Provision may include targeted interventions such as one-to-one or small group support, mentoring, and access to pastoral and safeguarding staff. The school works in partnership with parents, carers, and external agencies to ensure that appropriate strategies are implemented and regularly reviewed. Additional measures, including support with literacy, numeracy, attendance, and wellbeing, are tailored to reduce barriers to learning and promote positive outcomes. Through this approach, the school seeks to safeguard and promote the welfare of vulnerable students, enabling them to participate fully in school life and achieve their potential.

Any abuse involving students with SEND will require close liaison with the DSL (or deputy) and the SENCO.

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### Students with a social worker

It is recognised that when a child has a social worker, it is an indicator that they may be in a situation which puts them more at risk than most students. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

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

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### Young carers

A young carer is a child or young person under the age of 18 who provides care, assistance, or support to a family member who has a physical disability, mental health condition, chronic illness, or

substance misuse issue. This care can be practical, emotional, or supervisory and may go beyond what would normally be expected for someone of their age.

Young carers may be at increased risk of poor mental health, persistent absence, social isolation, and educational underachievement. It is therefore essential that young carers are identified as early as possible and offered appropriate support.

The school recognises the potential safeguarding implications for young carers and is committed to supporting them through a whole-school approach, which includes:

- Ensuring staff are trained to identify indicators that a student may be undertaking a caring role, such as frequent tiredness, anxiety, poor attendance, lateness, or difficulties with homework.
- Including young carers as a vulnerable group in the school's Vulnerable Student Tracker (VST) and ensuring they are RAG-rated appropriately.
- Engaging with parents or carers sensitively and appropriately to discuss any caring responsibilities, while recognising the possible need for professional curiosity and early help intervention.
- Making referrals to local young carers services or other agencies where appropriate and working in partnership with professionals to ensure a coordinated plan of support.
- Providing reasonable adjustments and targeted pastoral or academic support to reduce the impact of caring on the student's education and wellbeing.
- Ensuring young carers have a named staff member they can go to for advice and support.
- The school will ensure young carers' voices are heard and that they are supported to enjoy and achieve in line with their peers.

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## **Looked-after children, previously looked-after children & those cared for under a kinship care arrangement**

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children, previously looked-after children and those cared for under a kinship care arrangement safe. In particular, we will ensure that:

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

We have appointed a designated teacher, **Sarah Bhatti**, who is responsible for promoting the educational achievement of looked-after children, previously looked-after children and those who are cared for under a kinship care arrangement 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 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 children, previously looked-after children and those cared for under a kinship care arrangement, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

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## Vulnerable Student Tracker (VST)

Each school must maintain a Vulnerable Student Tracker (VST) which is reviewed at least weekly by the safeguarding team. The tracker will identify students who are vulnerable or at risk, using a RAG-rating system to highlight concerns. It should also capture risk assessments, external professional involvement, and referrals made. This ensures continuity in safeguarding practice and provides clarity for new safeguarding staff.

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## Students who are lesbian, gay, bisexual or gender questioning

We recognise that students who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

The school is committed to providing robust pastoral support for LGBTQ+ students, ensuring that all young people feel safe, respected, and able to thrive within our community. Staff will provide a listening ear and a non-judgmental space where students can share concerns in confidence. Where appropriate, students will be signposted to internal and external sources of specialist support, including counselling services and local LGBT organisations. The school will also work proactively with families, where appropriate, to promote understanding and care. Pastoral staff will advocate for LGBT students within the wider school context, challenging discrimination, addressing incidents of bullying, and ensuring that inclusive practices are embedded across teaching, activities, and enrichment opportunities. Through this approach, the school seeks to foster a culture of acceptance, belonging, and positive wellbeing for all students.

When families/carers are making decisions about support for gender questioning students, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning student, we will take a cautious approach as there are still unknowns around the impact of social transition, and a student may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the student). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where students can speak out or share their concerns with members of staff.

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## **Allegations of abuse made against other students (child-on-child abuse) - harmful sexual behaviours/sexual violence and sexual harassment**

All staff should be aware that children are capable of abusing other children, should be able to identify this, be aware of the importance of their role in preventing it and know how to respond where they feel a child may be at risk.

We recognise that even if there are no reported cases of child-on-child abuse, it may still be taking place but is just not being reported. We have a zero-tolerance approach to abuse, and it 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 recognise that the abuse can happen in or out of school, face-to-face or online and can occur simultaneously between the two; that it is more likely that girls will be victims and boys' perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students harming other students will be dealt with under our school's Behaviour & Ethos 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 e.g. 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)

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

- You must tell the DSL and record the allegation, 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 – the victim(s), the child(ren) against whom the allegation has been made and any other children affected by child-on-child abuse – with a named person they can talk to if needed, aware there may be physical and mental health implications requiring further support as well as signposting for additional support. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- 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 children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another agency is investigating or has investigated an incident does not (in itself) prevent our 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 LA 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.
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

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

- There’s no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies.
- The DSL will have to balance the victim’s wishes against their duty to protect the victim and other children.
- The DSL should consider that parents or carers should normally be informed (unless this would put the victim at greater risk).
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children’s social care.
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

**Regarding anonymity, all staff will:**

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims’ identities.

The government’s [information sharing advice for safeguarding practitioners](#) includes seven ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

**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 can 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
- Support students 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 student’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 student 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

## Informing parents/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 student, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. 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)

## External agencies

Whether or not the school decides to refer a particular complaint to children's social care services or the police, the parents/carers and student will be informed of their right to make their own complaint or referral to the children's social care services or the child protection unit of the Police and will be provided with contact names, addresses and telephone numbers, as appropriate.

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## Contextual safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors in the wider community outside the school and/or can occur between children outside the school.

All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. They should consider the context within which such incidents and/or behaviours occur. Assessments of children should consider whether wider environmental factors/risks/issues are present in a child's life and whether they are a threat to their safety and/or welfare. Details of the school's key contextual issues are shared with the Trust via the Oxfordshire safeguarding partnership.

There are several contextual safeguarding concerns relevant to the catchment area of Oxford Spire Academy. These include abusive behaviours (such as online abuse, neglect, child-on-child abuse, domestic abuse, and substance misuse), exploitation, anti-social behaviour, emotional-based school avoidance, and mental health challenges. These issues are reflected within the Academy's Safeguarding Strategic Plan, which outlines measures to effectively educate and support staff, students, and families. In light of national concerns regarding sexual violence and sexual harassment in schools, this area also forms a key component of the Strategic Plan. The Safeguarding and Pastoral Teams work in close partnership with relevant external agencies to ensure appropriate and effective support is provided.

Children's social care assessments should consider such factors, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Further information can be found in Appendix 2 below; KCSIE September 2025 Part 1, Annex B, Working Together to Safeguard Children (2023) and [www.contextualsafeguarding.org.uk](http://www.contextualsafeguarding.org.uk)

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## Domestic abuse and Operation Encompass

Domestic abuse is defined in the Domestic Abuse Act 2021 as any incident or pattern of incidents of controlling, coercive, threatening, degrading or violent behaviour, including sexual violence, between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. It can include physical, emotional, psychological, sexual, financial abuse, and coercive control.

Children can be victims of domestic abuse directly or indirectly. They may see, hear, or experience the effects of abuse at home, or suffer harm by being forced to live in a climate of fear and control. Experiencing domestic abuse can have serious, long-term emotional and behavioural consequences and is recognised as a form of harm in its own right.

The school is a participating member of **Operation Encompass**, a national initiative that aims to safeguard children who have been exposed to domestic abuse. Through this scheme, the police share information with the DSL if a child has been present at or involved in a domestic abuse incident.

When the school receives a notification via Operation Encompass:

- The information is treated as sensitive and confidential, and only shared with relevant staff on a need-to-know basis.
- The DSL (or Deputy DSL) will take appropriate action to support the child, ensuring they feel safe, listened to, and understood.
- The DSL may hold a meeting with the child, liaise with the pastoral team, consider whether a safety or support plan is needed, and monitor for further concerns.
- The school will work with other agencies where appropriate and consider an Early Help referral or contact with Children's Social Care, depending on the context and level of concern.

All staff should remain alert to signs of domestic abuse, including emotional distress, withdrawal, aggression, physical injuries, frequent absences, or disclosures from the student. If a member of staff suspects a child is at risk due to domestic abuse, they must report it to the DSL immediately.

The school ensures staff receive training on the impact of domestic abuse, including its potential effects on mental health, attendance, learning, and wellbeing.

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## The use of 'reasonable force' in schools and colleges

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard students.

The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the

arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained from violence or injury.

Staff may use reasonable force to prevent students from hurting themselves or others, from damaging property, or from causing disorder. Decisions on whether to use force must be based on professional judgement and consideration of individual circumstances, particularly for students with SEND or health conditions. The school follows DfE guidance, [\*Use of Reasonable Force\* \(2013, updated in January 2025\)](#).

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.

When using reasonable force in response to risks presented by incidents involving students with SEN or disabilities or with medical conditions, we will, in considering the risks, carefully recognise the additional vulnerability of these groups (under the Equality Act 2010) in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty.

Further detail can be found in the School Behaviour & Ethos Policy.

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

If staff become aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images or videos — including computer-generated imagery that appears realistic (also known as 'sexting' or 'youth-produced sexual imagery') — they must report it to the DSL without delay.

### Staff must not:

- View, copy, print, share, store or save the imagery, or ask a student to share or download it. If the imagery has been viewed accidentally, this must be reported to the DSL immediately.
- Delete the imagery or request that the student deletes it.
- Question the student(s) involved about the imagery. This is the responsibility of the DSL.
- Share information about the incident with other staff, students, or parents/carers, unless directed by the DSL.
- Blame, shame, or express judgment toward any student involved.

Staff should calmly explain that the incident will be reported and reassure the student(s) that they will receive support.

### Initial review meeting

Following a report, the DSL will convene an initial review meeting with appropriate staff, which may include the person who reported the concern and members of the safeguarding or senior leadership team. This meeting will assess the available information and determine:

- Whether there is an immediate risk to any student
- Whether a referral to the police and/or children's social care is necessary
- Whether it is essential to view the imagery to safeguard a student (in most cases, imagery should not be viewed)

- What further information is needed to decide the most appropriate response
- Whether the image(s) have been widely shared and via which platforms (if known)
- Whether action is needed to delete or remove the images
- Any contextual factors about the students involved that may influence risk
- Whether there is a need to contact another school, college, or individual
- Whether parents/carers should be informed (in most cases, they should)

## **Mandatory referral circumstances**

An immediate referral to the police and/or children's social care will be made if:

- The incident involves an adult. (Some adults may pose as children to groom or exploit.)
- There are concerns about coercion, blackmail, grooming, or the capacity to consent (e.g. due to SEND).
- The content depicts acts that are developmentally inappropriate or violent.
- Any student depicted in a sexual act is under the age of 13.
- A student appears to be at immediate risk of harm (e.g. presenting as suicidal or self-harming).

If none of these apply, the DSL — in consultation with the Headteacher and relevant staff — may decide to manage the incident internally. This decision will be documented in line with this policy.

## **Further review by the DSL**

If external referrals are not made at the initial stage, the DSL will carry out a further review to gather relevant facts and assess any ongoing risk. This may include interviews with the students involved (where appropriate).

At any point, if concerns arise that a student has been harmed or is at risk of harm, a referral will be made immediately to children's social care and/or the police.

## **Informing parents and carers**

Parents and carers will be informed at an early stage, unless doing so is considered likely to place a student at risk of harm. The DSL will make this decision in line with safeguarding procedures.

## **Police involvement**

Where police involvement is required, referrals will be made through the school's agreed procedures:

If the school assesses the risk of harm to be high, the police will be contacted immediately via 999. For lower-risk concerns, or where the matter is not ongoing, the school will seek support by contacting 101. Oxford Spires Academy has a designated Schools Police Liaison Officer who works in close partnership with the Safeguarding Team to provide support and deliver education to students on key topics relating to safety and the criminal justice system.

## **Recording and monitoring**

All incidents involving the sharing of nudes and semi-nudes, and the decisions made in response, will be recorded in accordance with the record-keeping arrangements set out in section 14 of this policy.

## Curriculum and education

Students are taught about the risks and implications of sharing nudes and semi-nudes through the Relationships and Sex Education and computing curriculum. Teaching includes:

- What the sharing of nudes and semi-nudes is
- Common contexts in which it may occur
- The legal, emotional and social consequences
- How to identify when it is abusive or may constitute online sexual harassment
- The impact on wellbeing and reputation

Students also learn how to manage:

- Requests or pressure to share images
- The receipt of unwanted images

This policy is shared with students so they are aware of the school's safeguarding processes and know that they will be supported.

Teaching follows best practice and prioritises:

- A safeguarding-first approach
- Child-centred, non-judgemental delivery
- Encouraging dialogue and understanding
- Challenging victim-blaming attitudes
- Empowering students with the knowledge and skills to protect themselves

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## Concerns and allegations about staff

### Safeguarding concerns about a staff member, supply teacher, volunteer or contractor

We recognise the possibility that adults working in the school may harm children, including, volunteers, supply teachers, agency staff or contractors. If you have concerns about any adult in the school, speak to the Headteacher without delay, in their absence the DSL.

Where there are concerns about the Headteacher, this should be referred to either the Director of Education (North/South) or the Executive Director of Education who must inform the Chief Executive Officer of the Trust immediately.

The Headteacher/Executive Director of Education/DSL will then follow the procedures set out in the Trust Allegations Against Staff Policy.

If a staff member feels unable to raise their concerns/issues with their Headteacher then report it directly to the LADO; if they feel that their genuine concerns are not being addressed, they must refer to the Whistleblowing Policy and/or contact the trust or the NSPCC Whistleblowing advice line directly.

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 Trust safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

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### Managing safeguarding concerns and allegations about staff

The school has policies and procedures for dealing with allegations against staff (including supply staff, volunteers and contractors) that aim to strike a balance between the need to protect students from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. These procedures follow the DfE guidance Keeping Children Safe in Education September 2025, and should be used where an allegation is made about a person working in a school/college that provides education for children under 18 years of age, including members of staff, supply staff, volunteers or contractors, that they have:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child, OR
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside the school.

All allegations against staff/volunteers will be reported to the Headteacher immediately, or to the Director of Education (North/South) Executive Director of Education in the initial stages where the Headteacher is the subject of the allegation.

Allegations must not be shared with other staff, parents or students.

Where there is any doubt whether a concern or allegation meets the harm threshold, the school should consult with the Local Authority Designated Officer (LADO).

For any safeguarding concerns or allegations against staff, staff must refer to the [Allegations Against Staff Policy](#) which is available on the Anthem Staffroom under People/HR policies.

## **Ceasing to use staff**

If the school ceases to use the services of an accused member of staff (or an ACC member or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used. A referral to the Disclosure and Barring Service (DBS) will be made. If the staff member is a teacher, a referral may/will be made to both the Disclosure and Barring Service and the Secretary of State via the Teaching Regulations Agency (TRA) by the school with the support of the Anthem Executive Director of Education/Head of Safeguarding if required. Any such incidents will be followed by a review of the safeguarding procedures within the school, with a report being presented to Trustees without delay.

## **Resignation**

If a member of staff (or volunteer) tenders their resignation, or ceases to provide their services, any child protection allegations will still be followed up by the school. Resignation will not prevent an investigation or the conclusion of an investigation and may prompt detailed referrals being made to the DBS and/or the TRA.

## **Criminal proceedings**

The school will consult with the LADO following the conclusion of a criminal investigation as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed.

## **Record keeping and retention of documentation**

Details of **substantiated** (sufficient evidence to prove the allegation) and unsubstantiated (insufficient evidence to prove or disprove the allegation) allegations will be recorded on the employee's file and retained at least until the employee reaches the normal retirement age or for a period of ten years from the date of the allegation, if this is longer.

**Substantiated** allegations will be referred to in references.

**Unsubstantiated** allegations will not normally be referred to in reference requests.

Allegations that are found to have been **malicious** (sufficient evidence to prove the allegation and there has been a deliberate act to deceive), **false** (sufficient evidence to disprove the allegation) or **unfounded** (where there is no evidence or proper basis which supports the allegation being made) will be removed from the employee's records.

## **Malicious and unsubstantiated allegations made by students**

Where an allegation by a student is shown to have been deliberately invented or malicious, the Headteacher will consider whether to take disciplinary action in accordance with the School Behaviour & Ethos Policy. The school and the LADO will discuss whether to refer the matter to children's social care to determine whether the student is in need of services, or to consider if the student might have been abused by someone else. Schools may choose to note this malicious allegation on the student's record for information only, where a pattern of malicious referrals might be made. (See KCSIE September 2025, Part 4 for further guidance).

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## Low-level concerns about staff behaviour

Concerns may be graded low level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the relevant Code of Conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- Being over friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- Humiliating students.

**If the concern has been raised via a third party, the Headteacher should collect as much evidence as possible by speaking:**

- Directly to the person who raised the concern unless it has been raised anonymously.
- To the individual involved and any witnesses.

Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

The school will work to ensure a culture of openness, trust and transparency so staff feel encouraged and feel confident about what appropriate behaviour is, about confidentially sharing low level concerns, addressing unprofessional behaviour and/or are able to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

**Low-level concerns should be reported to the Headteacher (or Executive Director of Education if about the Headteacher) and recorded via the school's Low-Level Concern Form <https://forms.office.com/Pages/ResponsePage.aspx?id=pGcNtDFve0GB0B6WvxpVXEDiP3m3feFLt hMjoiE necBUQTRBWTdCV1IZTTFPFVZWFM2NkhCNVc0OS4u> , including:**

- Name\* of individual sharing their concerns.
- Details of the concern.
- Context in which the concern arose.
- Action taken.
- Rationale for the decision
- Date

*(\*if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)*

The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL (and it should be explained to staff how they will work together in the process/procedure for confidentially sharing low-level concerns).

Records must be kept confidential, held securely and comply with the Data Protection Act 2018.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the threshold for harm, then the matter should be referred to the LADO.

If there is any doubt about the low-level concern and whether it meets the threshold or not the school should contact the Head of Safeguarding, the Head of HR and/or the LADO.

If the records' review identifies that there are wider cultural issues within the school that enabled the behaviour to occur, the school may review/revise policies, processes and/or deliver extra training to minimise the risk of it happening again.

For more information, please refer to our [Allegations Against Staff Policy](#) on the Anthem Staffroom, under People/HR policies.

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### Whistleblowing

Whistleblowing is the disclosure of information that relates to a genuine concern of suspected wrongdoing or dangers at work.

Whistleblowing covers concerns made that report wrongdoing that is “in the public interest”.

Examples of whistleblowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Students' or staff health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Damage to the environment
- An abuse of power or authority
- Attempts to cover up the above, or any other wrongdoing in the public interest

A whistleblower is a person who raises a genuine concern relating to the above. Not all concerns about the trust, or individual schools in the trust, count as whistleblowing. For example, personal staff grievances such as bullying, or harassment do not usually count as whistleblowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance. Such complaints should be raised using the Grievance or Dignity at Work policies.

Such unacceptable acts or omissions may have been carried out by employees, caused by faults in procedures or may be oversights that need to be rectified. The act or omission may have finished, be in process or not yet started.

Anthem recognises that the reporting a concern can be a difficult decision to take, not least because of the fear of reprisal. Anthem aims to encourage openness and will support employees who raise genuine concerns in good faith under the Whistleblowing Policy, even if the concern turns out to be unfounded.

Employees are encouraged to report their concerns by emailing the dedicated whistleblowing mailbox: [whistleblowing@anthemtrust.uk](mailto:whistleblowing@anthemtrust.uk)



## Child Protection and Safeguarding Policy

More information about whistleblowing can be found in the [Whistleblowing Policy](#) and at <https://www.gov.uk/whistleblowing>

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## Safer recruitment and safer working practice

### Safer recruitment

To ensure that children are protected whilst at this school, we will ensure that our staff and volunteers are carefully selected, screened, supervised and trained.

We accept that it is our responsibility to follow government guidance regarding safer recruitment.

We will ensure that the checks will be made in conjunction with the relevant agencies including the Teaching Regulation Agency (TRA), the Disclosure and Barring Service (DBS) and the Home Office.

#### The checks include:

- Identity, including name and current address.
- Right to work in the UK.
- Qualifications.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity. 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 will still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- A separate barred list check
- 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
- References (in accordance with the Safer Recruitment Policy).
- Medical Fitness.
- Prohibition from teaching.
- Prohibition from Management (where applicable to the role).
- Childcare (Disqualification) Regulations 2009 (for staff member but not “disqualification by association”).
- Online search on shortlisted candidates (shortlisted candidates to be informed that these will be carried out as part of the due diligence process)

These checks will be made in accordance with the Safer Recruitment Policy. They will be made in accordance with the role applied for.

For overseas checks post EU exit 1st January 2021, see KCSiE 2025 Part 3 and <https://www.gov.uk/guidance/recruit-teachers-from-overseas>.

All checks made will be recorded on the school's Single Central Record (also known as the Register) in line with the guidance. Any other checks (medical, references) are not necessarily required to be recorded but may be at the discretion of the organisation. All the checks however must be maintained in the staff personnel files and appropriately recorded as being so (e.g., on a staff personnel file checklist).

Full details of our safer recruitment procedures are set out in the school's Safer Recruitment Policy.

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## Training

### All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing 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 in line with advice from our local safeguarding partnership, national guidance/initiatives and will have regard to the Teachers' Standards. The mandatory training for staff is the child protection policy, the Behaviour & Ethos policy, the staff Code of Conduct, the children missing education guidance and the role and identity of the DSL and the deputy DSLs. Staff are expected to have read these documents.

The DSL will plan the training cycle so that it covers all aspects of child protection and safeguarding according to the school's contextual needs and in line with the whole-Trust safeguarding approach and training content overview.

All staff will have training on online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.

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 (e.g. through emails, e-bulletins, briefings and staff meetings) as required, but at least annually.

Volunteers, agency/supply staff and contractors working in school will receive appropriate training.

All staff of the Trust, including Trustees, ACC members and members of the national team, Head of Safeguarding and Executive Director of Education will undertake training relevant to their roles and responsibilities.

All members of the safeguarding team have access to termly Safeguarding Network meetings, which are led by the Anthem Head of Safeguarding. These meetings include updates on national and local guidelines and legislation, training via case scenarios on various safeguarding topics, discussions with representatives from other schools, updates on processes and procedures, and opportunities for our schools to share and showcase best practices that can be implemented by others.

### The DSL and deputy

The DSL and deputy will undertake child protection and safeguarding training at least every two 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, or taking time to read and digest safeguarding developments).

All safeguarding team members must access 'CPOMS and Record Keeping' training through the Anthem Institute. The DSL and DDSL must attend termly Anthem Safeguarding Forums or ensure they watch the recording for any session that is missed.

A Safeguarding Induction must be provided for all new safeguarding team members using the trust-wide induction framework that is delivered either by the Head of Safeguarding or by the Headteacher and/or the DSL.

They will also undertake Prevent awareness training, including on extremist and terrorist ideologies.

### **Trustees and ACC members**

All Trustees and ACC members will receive training about safeguarding and child protection (including online) at induction, which is updated regularly, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge. It is also so that they 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 ACCs may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

### **Staff who have contact with students and families**

All staff 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.

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### **Early Career Teachers & Trainees (ECTs)**

Early Career Teachers (ECTs), trainee teachers and student placements will receive enhanced safeguarding induction and ongoing supervision. Mentors and senior leaders must ensure safeguarding procedures are embedded early, and supervision includes reflection on safeguarding and professional boundaries.

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### **Clinical supervision**

Anthem Schools Trust recognises the significant impact that supporting our most vulnerable can take. As such, Anthem Schools Trust provide external clinical supervision for our safeguarding teams to ensure effective support and guidance.

Clinical supervision sessions are conducted in accordance with professional standards and are designed to promote reflective practice, enhance decision-making skills, and support the emotional well-being of safeguarding personnel.



## Child Protection and Safeguarding Policy

Case management supervision is also provided to schools via the Head of Safeguarding via the Deep Dive and Deep Dive Light visits as well as via the Significant Safeguarding Incident (SSI) process.

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## Online and digital safety

### E-Safety/online safety at home

We recognise that technology is a significant component of many safeguarding and wellbeing issues and can provide the platform for harmful and inappropriate online material. We endeavour to do everything possible to address this including:

- Having robust processes, including filtering and monitoring systems, in place to ensure the online safety of students, staff, volunteers and ACC members.
- Protecting and educating the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Setting clear guidelines for the use of mobile phones for the whole school community.
- Establishing clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

### The areas of risk are categorised into four areas:

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

With a view to this, 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're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, 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 all students, parents/carers, staff, volunteers and ACC members 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](#).
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- 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.

The DSL will have strategic oversight of the school's online filtering and monitoring systems. The DSL must understand how the system functions, including the categories of risk monitored, escalation routes, and review frequency.

Full details are set out in the trust E-Safety Policy, each school's Mobile Phone Policy and in the government guidance document

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## Artificial Intelligence

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.

We recognise 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.

We will treat any use of AI to access harmful content or bully students in line with this policy and our anti-bullying policy.

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

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## Mobile phones and cameras

Staff (including volunteers, contractors and anyone else otherwise engaged by the school) are not permitted to use their personal mobile phone, while students are present. Use of personal mobile phones must be restricted to non-contact time, and to areas of the school where students are not present (such as the staffroom).

There may be circumstances in which it's appropriate for a member of staff to have use of their phone during contact time for personal reasons. For instance (this list is non-exhaustive):

- For emergency contact by their child, or their child's school
- In the case of acutely ill dependents or family members

The headteacher will decide on a case-by-basis whether to allow for special arrangements. Staff should only use their mobile phones during off-duty breaks or in the case of an emergency.

We will follow the UK General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

In some circumstances, it may be appropriate for staff to use personal mobile phones for work. Such circumstances may include, but aren't limited to:

- To issue homework, rewards or sanctions
- To use multi-factor authentication
- Emergency evacuations
- Supervising off-site trips
- Supervising residential visits

In these circumstances, staff will:

- Use their mobile phones in an appropriate and professional manner, in line with our staff code of conduct
- Not use their phones to take photographs or recordings of students, their work, or anything else which could identify a student
- Refrain from using their phones to contact parents/carers. If necessary, contact must be made via a school device.

Mobile phones should not be used or visible in public areas around the school.

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## Managing safeguarding outside of school

### Alternative Provision

Where a school places a student with an alternative provision provider, the school continues to be responsible for the safeguarding of that student and should be satisfied that the provider meets the needs of the student. (KCSIE 2025, paragraph 168-171)

When placing students in alternative provision, a commissioning process must be followed and documented using the Alternative Provision Policy appendices. Quality assurance visits to providers

must take place fortnightly and safeguarding responsibilities clearly documented. Any part-time timetables or managed moves require parent/carer agreement and must be recorded using trust-approved templates.

Schools will obtain written confirmation from the alternative provider that appropriate safer recruitment checks have been carried out on individuals working at the establishment, i.e., those checks that the school would otherwise perform in respect of its own and agency staff.

Schools will also hold copies of Child Protection and Safeguarding policies for all providers and ensure that the setting is appropriate prior to a child starting a placement.

Full details regarding the checks completed can be found in our Alternative Provision policy.

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## Adults who supervise students on work experience

Schools organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm.

Consideration must be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations would include whether the person providing the teaching/training/instruction/supervision to the student on work experience will be:

- Unsupervised themselves; and
- Providing the teaching/training/instruction frequently (more than three days in a 30-day period, or overnight).

If the person working with the student is unsupervised and the same person is in frequent contact with the student, the work is likely to be regulated activity. If so, the school will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person and receive confirmation in writing. Schools are not able to request an enhanced DBS check with barred list information for staff supervising children aged 16 to 17 on work experience.

If the activity undertaken by the student on work experience takes place in a 'specified place', such as a school or college, and gives the opportunity for contact with students, this may itself be considered to be regulated activity. In these cases, and where the student is 16 years of age or over, the work experience provider should consider whether a DBS enhanced check should be requested for the student in question. (DBS checks cannot be requested for children/young people under the age of 16).

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## Students staying with host families (homestay)

Schools quite often make arrangements for their students to have learning experiences where, for short periods, the student may be provided with care and accommodation by a host family to whom they are not related i.e., as part of a foreign exchange visit or sports tour, often described as 'homestay' arrangements (see Annex D of KCSIE September 2025 for further details).

**School should:**

- Consider the suitability of the adults in the host families.

- Obtain a DBS enhanced certificate with barred list information for any adults in the host home. (Where these are volunteer hosts, the check can be obtained free of charge by the school).

NB: Where there are 16-18-year-olds also living in the house, schools can obtain an enhanced DBS check for these but cannot request a Barred list check.

Where schools arrange overseas homestays for their own students, they should liaise with their partner schools abroad to establish a shared understanding of the arrangements in place before and during the visit. They should be satisfied that the arrangements are appropriate and sufficient to safeguard their students. The school retains the safeguarding responsibility for their students.

Where 'homestays' extend to 28 days or more for a student aged under 16 (under 18 if the student has disabilities) this may amount to 'private fostering' (Children's Act 1989) and must be treated accordingly.

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## Private fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The school must be clear who has parental responsibility.

The DSL will speak to the family of the student involved to check that they are aware of their legal duty to inform the LA at least six weeks prior to the arrangement starting (it is a criminal offence not to do so). The school itself has a mandatory duty to inform the local authority of the private fostering arrangements and thus allow the local authority to check that the arrangement is suitable and safe for the child.

Privately fostered children are a potentially vulnerable group who should be monitored by the LA especially if they have come from another country or could be affected by abuse, neglect, trafficking, CSE or modern-day slavery.

(A comprehensive guidance on the circumstances in which private fostering may arise can be found at DfE statutory guidance *Children Act 1989 Private fostering*).

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## Elective Home Education

Parents have the right to educate their children at home (Section 7 of the Education Act, 1996) and may elect to home educate at any stage up to the end of compulsory school age. This is a personal decision that the school should not suggest or influence.

Parents are not required to register or seek approval to educate their children at home (except students on roll of a special school), however, they are required to provide written notification of their intention to home educate to the school so their child can be deleted from the school roll. If a child is registered at the school because of a school attendance order the parents must have the

order revoked by the local authority by providing evidence of a suitable education before the child can be de-registered.

On receipt of written notification to home educate, the school will inform the student's local authority that the student is to be deleted from the Admissions Register. However, where parents orally indicate that they intend to withdraw their child to be home educated, the school should consider notifying the local authority at the earliest opportunity.

If there are safeguarding concerns this information must be reported to the local authority and a referral must be submitted to the local authority's children's social care team if concerns are significant. The Designated Safeguarding Lead should follow the local authority processes for informing them of a parent's decision to home educate.

Should the school have safeguarding concerns the school may conduct further welfare checks e.g. calls home and/or home visits until the local authority provide an update to the school to confirm they are satisfied with the provision provided.

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### **Children Missing Education**

Poor attendance is a potential indicator of abuse or neglect. The school will follow the Trust's five-day protocol to escalate unauthorised absence and notify the local authority as required. The DSL must be informed of repeated or concerning absence.

All Anthem schools follow a five-day protocol when a student is absent without reason, escalating daily from contact attempts to home visits and a police welfare check, with CME referrals submitted by Day 5 if no contact is made and the schools have been unable to locate the student.

Further details of this can be found in our Attendance policy and within our Missing Pupils policy.

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## Site and operational safeguarding

### School premises

The school will take all practicable steps to ensure that school premises are as secure as circumstances permit, conducting regular risk assessments and maintaining a log of risk assessments, and other health and safety checks. All reportable incidents will be reported to the Trust promptly and health and safety processes followed.

Visitors and parents/carers are not allowed into school buildings without a visitor's badge and will be accompanied by a member of staff whilst inside the building(s). Visitors wishing to enter a school building must sign in on arrival and sign out again on departure. Un-badged and unaccompanied visitors inside buildings will be challenged by a member of staff and escorted to the office to complete the signing-in procedures. Those visiting the school site to collect or drop off children or to watch matches or concerts are restricted to appropriate areas and will be directed as to which locations are available to them.

Schools will check the identity of all new agency staff on arrival (by requesting photo id) and ensure the person presenting themselves for work is the same person that the agency has provided vetting checks for.

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### Before and after school activities\*

Where permission has been given for the use of school premises to bodies (such as sports clubs) to provide out-of-school-hours activities, Anthem Schools Trust expects that it will ensure that these bodies have appropriate Child Protection and Safeguarding policies and procedures (including appropriate police checks) and that there are arrangements in place to link with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with these bodies.

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### Contracted services\*

Where the school contracts its services to outside providers, Anthem Schools Trust expects that it will ensure that these providers have appropriate Child Protection and Safeguarding policies and procedures, and that there are arrangements in place to link with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with the provider. (See also the Trust Safer Recruitment Policy).

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### Lettings

As part of the school's letting procedures, all reasonable checks will be made to ensure hirers will not be using the school premises to promote any extremist views. The school will follow guidance set out in Tackling Extremism and Anti-Radicalisation (Prevent) and Letting policies.

The school will follow safeguarding procedures and inform the LADO if there is an allegation of an incident happening while an individual or organisation is using the academy premises to run activities for children

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## Oversight, monitoring and review

### Quality assurance, monitoring and analysis

Anthem Schools Trust places a high priority on the continuous review and analysis of safeguarding data, processes and procedures.

The Head of Safeguarding utilises CPOMS, CPOMS Insight, and Bromcom, which provide detailed insights into trends across the Trust in various safeguarding areas, enabling tailored interventions and support both locally and nationally.

In conjunction with the above analysis, Deep Dive and Deep Dive Light visits are conducted termly by the Head of Safeguarding to review and monitor the implementation and effectiveness of safeguarding processes and procedures at each school within the Trust. These visits may involve:

- Reviews of safeguarding records and case files to verify compliance with policies and procedures.
- Discussions with the DSL, wider staff, and students to gather qualitative data on the safeguarding environment.
- Observations of the school's safeguarding practices in action, including how staff respond to safeguarding concerns and support students.

In addition to the Deep Dive visits, Anthem commissions Judicium Education to conduct external safeguarding reviews to ensure that safeguarding processes and procedures within our schools are compliant and operating at the highest standard.

As part of these reviews, Judicium Education examines all aspects of the schools' safeguarding practices and incorporates the views of both staff and students. A report is produced along with an action plan, the progress of which is reviewed by the Head of Safeguarding during the termly Deep Dive visits to ensure that appropriate action has been taken to address all identified areas.

A national team safeguarding Deep Dive is also conducted by the Head of Safeguarding regularly. This review incorporates safer recruitment, the single central record, training records, low-level concern logs, and LADO logs for the National Team, to confirm that all areas of Anthem are compliant. An action plan is produced and provided to the executive team, ensuring that actions are taken to address identified areas.

Data from CPOMS, Deep Dives, SSI notifications, and other safeguarding metrics are collated in the Trust Safeguarding Dashboard. This is used to track trust-wide trends, identify risks, inform training needs, and provide an overview to the Board of Trustees. The Safeguarding Dashboard is live and is maintained throughout the academic year, enabling the Head of Safeguarding to track the progress of schools while identifying strengths and areas for improvement locally and nationally. The Head of Safeguarding reports to the Executive Director of Professional Services and General Counsel on a weekly basis. Key themes and updates are then shared with the Executive Team to assure all are aware of priorities and areas identified.

The Executive Director of Professional Services and General Counsel reports safeguarding data and analysis to both the Audit & Risk Committee and Full Board of Trustees four times a year, informing strategic decision-making and assessing the impact of the Anthem wide safeguarding processes and procedures.

The information provided within these reports is shared with the schools, the Head of Safeguarding, and Directors of Education, and is fed into the Safeguarding Dashboard and within the reports to both Full Board of Trustees and the Audit & Risk Committee four times a year.

Any serious child protection incidents at the school will be followed by a review of the safeguarding procedures within the school and a prompt report to the Executive Director of Education, the Head of Safeguarding and Executive Director of Professional Services and General Counsel. In addition, the DSL will monitor the operation of this policy and its procedures and will make a termly report to the ACC.

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## Review of this policy

The Trust will undertake an annual review of this policy and how their duties under it have been discharged. They will ensure that any deficiencies or weaknesses with regard to child protection arrangements at any time are remedied or reported without delay.

Prior to any review of the policy, feedback will be sought from all relevant stakeholders on the effectiveness of the policy.

Staff should receive training on how to identify vulnerable learners and understand that there may be additional safeguarding vulnerabilities for students with SEN and disabilities (SEND), and certain health conditions and how those barriers can be overcome. [Safeguarding disabled children, practice guidance 2009](#).

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## Additional safeguarding information and documentation

There are three appendices attached to this policy which supplement the information in this policy, they are:

- Appendix 1: Types of abuse and neglect.
- Appendix 2: Specific contextual safeguarding issues.
- Appendix 3: Useful statutory documents and guidance materials.

## Anthem Safeguarding Strategy

This policy is underpinned by the Anthem Safeguarding Strategy 2025–2028, which sets out a Trust-wide vision for safeguarding that moves beyond compliance to embed a deeply rooted culture of safety, inclusion and shared responsibility. Over recent years, all Anthem schools have met core safeguarding requirements, establishing a solid foundation for this next phase. The strategy emphasises empowerment, inclusivity, and collaboration — placing safeguarding at the heart of everyday values, behaviours and decision-making. Through student and community engagement, stronger integration with inclusion and SEND, and targeted professional development, the Trust is creating environments where safeguarding is not simply a statutory duty, but a collective commitment to ensuring every child feels safe, valued and able to thrive.

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## Anthem Safeguarding Handbook

This policy is supported by the Anthem Schools Trust Safeguarding Handbook (June 2025), which provides detailed operational guidance for implementing safeguarding practice across all Anthem schools. The handbook complements this policy by offering practical resources, procedural checklists, and specific guidance for staff, safeguarding leads, and school leadership.

All staff and leaders are expected to be familiar with the contents of the handbook and use it in conjunction with this policy, statutory guidance (such as Keeping Children Safe in Education, September 2025), and relevant local procedures.

A copy of the Handbook is available to all staff via the staff shared drive and may be requested from the Designated Safeguarding Lead.

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## Anthem Attendance Ambitions

This policy is aligned with the *Anthem Schools Trust Attendance Ambitions* framework, which outlines strategic expectations and proactive approaches to improving attendance across all Anthem schools.

Attendance is a safeguarding issue, and persistent or unexplained absence may be an indicator of safeguarding risk. Staff must use the guidance within the Attendance Ambitions document to inform their early help strategies, interventions, and escalation procedures.

The Designated Safeguarding Lead and attendance team should work together to ensure attendance monitoring is embedded within safeguarding practice. The document is available on the Anthem intranet and from school leadership.

A copy of the document is available to all staff via the staff shared drive and may be requested from the Designated Safeguarding Lead.

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## Links with other policies

This policy links to the following policies and procedures:

- Anti-bullying
- Attendance
- Behaviour & Ethos
- School's Concerns and Complaints
- Curriculum
- Exclusions
- First Aid
- Health and Safety
- Home Visits
- Induction
- Allegations against staff

- Administration of medicines and supporting students with medical conditions
- E-Safety
- Privacy notices
- Risk Management
- Safer Recruitment
- Relationships and sex education and health education
- Staff Code of Conduct
- Whistleblowing

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This Policy was evaluated and approved by the Trustees of Anthem Schools Trust in September 2025. This policy will be reviewed annually.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education September 2025.

## Appendices

### Appendix 1: Forms of abuse and neglect (see KCSiE 2025 (Annex A))

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap. 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 and a child may be abused by other children or adults, in a family or in an institutional or community setting by those known to them, or more rarely, by others.

**Physical abuse** is a form of abuse that 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. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. 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 cyberbullying.), causing children frequently to feel frightened or in danger.
- Exploitation or corruption of children including CSE/CCE.
- Psychological abuse including radicalisation.
- Honour-based abuse used to control behaviour within families to protect perceived cultural or religious beliefs or honour, including forced marriage and FGM.

**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 oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

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

Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children.

The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.

**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 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 caregivers), or
- Ensure access to appropriate medical care or treatment.

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

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## Appendix 2: Specific safeguarding issues

### Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of 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.

#### 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.

#### 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.

### **Children who are absent from education**

A child being absent from education, particularly repeatedly, 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. 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

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.

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.

## **Child criminal exploitation**

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. It may involve an 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.

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.

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 trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## Child sexual exploitation

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. It may involve an 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.

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.

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.

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.

## Child-on-child abuse

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.

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 cyber-bullying, prejudice-based and discriminatory bullying).
- 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).
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
- Upskirting, 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 indecent 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 out on pages 21-24 of this policy, as appropriate.

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.

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

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.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, 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.

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

## Homelessness

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

The DSL and deputy/deputies will be aware of contact details and referral routes in to 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.

## 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.

## 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.

Pages 17 and 18 of this policy set 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.

## Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. 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 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one 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 local safeguarding procedures and refer the case to the local authority's designated officer.

- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmufco.gov.uk](mailto:fmufco.gov.uk)
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

## Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  - Negate or destroy the fundamental rights and freedoms of others; or
  - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points.
- **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 charity [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 Facebook or Twitter.
- 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.

## Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between two 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).

Sexual violence and sexual harassment exist on a continuum and may overlap.

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

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, bisexual and transgender (LGBT) children 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.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out on pages 21-24 of this policy.

### **Serious violence**

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

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

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

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being involved in, or at risk of, serious violence, they will report this to the DSL.

## Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), 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 on the school signing in tablet 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 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.

## Missing students

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, please refer to our Missing Pupils Policy.

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## Appendix 3: Useful statutory documents and guidance materials

[Children Missing Education 2013 - statutory guidance](#) (updated August 2024)

[Data Protection in Schools, June 2025](#)

[Government Guidance Disqualification under the Childcare Act 2006, Revised September 2018](#)

[Improving the educational outcomes of Children in Need of help and protection – Children in Need review](#)

[Information sharing: advice for practitioners providing safeguarding services, May 2024](#)

[Mental health and behaviour in schools, Nov 2018](#)

[Education inspection framework for September 2023](#)

[Ofsted Positive environments where children can flourish, 2018 \(updated October 2021\)](#)

[Ofsted School Inspection Handbook September 2024](#)

[School Monitoring Handbook September 2024](#)

[Teacher status checks; information for employers April 2025](#)

[Revised Prevent duty guidance: for England and Wales \(updated March 2024\)](#)

[Preventing and Tackling Bullying, July 2017](#)

[Regulated activity with children in England, February 2025](#)

[Searching screening and confiscation, July 2023](#)

[UK Council for Internet Safety \(UKCIS\) Sharing nudes and semi-nudes: advice for education settings working with children and young people, December 2020 \(updated March 2024\)](#)

[Teaching online safety in school, June 2019 \(updated January 2023\)](#)

[What to do if you're worried a child is being abused, March 2015](#)

[Home Office's Preventing youth violence and gang involvement](#)

[Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance, July 2017 \(updated October 2023\)](#)