Trust Safeguarding and Child Protection Policy

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Safeguarding is core to our work, not an 'add-on'.

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1. POLICY DEVELOPMENT AND REVIEW

This policy:

- has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002
- has been written in line with the Department for Education (DfE) statutory guidance – Keeping Children Safe in Education, September 2026, and any other relevant UK legislation and government guidance
- should be read in conjunction with 'Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children' 2026.
- applies at all times when providing services or activities directly under the management of the Inspiring Learners Multi Academy Trust staff
- is publicly available on the Trust and schools' website
- is provided to all staff (including temporary staff) at induction including the Staff Code of Conduct

Owing to the serious nature and importance of Safeguarding at Inspiring Learners Trust this policy will be **reviewed annually** in the autumn term and approved by the Trust Board as soon as possible thereafter.

The policy is provided to all staff at induction alongside our Professional Code of Conduct. In addition, all staff are provided with Part One of the statutory guidance 'Keeping Children Safe in Education', DfE (2026).

2. INTRODUCTION

Inspiring Learners Trust is totally committed to Safeguarding Children and to a culture of vigilance and we expect everyone who works in our school to share this commitment Adults in our school take all welfare concerns seriously and encourage children to talk to us about anything that worries them. We will always act in the best interests of the child.

Safeguarding is core to our work, not an 'add-on'.

We are committed to deeply embedding a true safeguarding culture within our schools and throughout our Trust to ensure safeguarding practice is not just compliance (a tick box approach) but truly creates an environment where our children are safe, they feel secure and are enabled to thrive. Our staff build trusted relationships with our children which facilitates communication, they have a professional curiosity and always think "it could happen here".

Our Trust ***Effective Safeguarding Culture Model underpins our approach.***

This policy has been developed to ensure that all adults in **Inspiring Learners Trust** (including visitors and volunteers) are working together to safeguard and promote the welfare of children and young people.

This policy describes the management systems and arrangements in place to create and maintain a safe learning environment for all our children, young people and staff. It identifies actions that should be taken to redress any concerns about child welfare.

The Headteacher or in their absence, the authorised members of staff, have the ultimate responsibility for safeguarding and promoting the welfare of children and young people.

Safeguarding and promoting the welfare of children and young people goes beyond implementing basic child protection procedures. It is an integral part of all activities and functions of **Inspiring Learners Trust**. This policy complements and supports other relevant school and Local Authority policies.

Under the Education Act 2002 schools/settings have a duty to safeguard and promote the welfare of their pupils and, in accordance with guidance set out in 'Working Together to Safeguard Children 2026'. We will work in partnership with other organisations where appropriate to identify any concerns about child welfare and take action to address them.

The purpose of this document is to ensure that all stakeholders are aware of the arrangements that **Inspiring Learners Trust** has in place for safeguarding and promoting the welfare of its pupils. It provides

guidance to help staff who may have concerns about the safety or welfare of a child and sets out the school's position in relation to the safeguarding process.

This policy is consistent with all other policies adopted by the Trustees/Governors and should in particular be read in conjunction with the following policies relevant to the safety and welfare of children:

- **Staff Code of Conduct**
- **Online Safety Policy**
- **Acceptable Use Policy**
- **Mobile Phone Policy**
- **Social Media Policy**
- **Curriculum Design**
- **Whistle Blowing Policy**
- **Health and Safety Policy**
- **Children who are Missing or Absent from Education Policy**

Other relevant policies

- **SEND/Learning Differences**
- **Behaviour**
- **Kindness and Anti-Bullying**
- **Equality Scheme**
- **Relationships and Sex Education**
- **Educational Trips and Visits**
- **Supporting Pupils with Medical Conditions**
- **First Aid**
- **Intimate Care**
- **Attendance**
- **Data Protection policies and procedures**

TSCB Policies

- **Managing Allegations and Concerns Against Staff and Volunteers**
- **Encompass Procedure**

3. ROLES AND RESPONSIBILITIES

See KCSIE 2026 Part 1 (paragraphs 4 - 10), Part 2 (paragraphs 125 – 129), Annex B

See **Appendix 1** for Specific Safeguarding responsibilities *(Headteacher, Trust Board, Local Governing Body, Designated Safeguarding Lead and Staff).*

4. DEFINITION OF SAFEGUARDING

KCSIE 2026: Safeguarding and promoting the welfare of children is defined for the purposes of this guidance 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 the 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. (paragraph 3)**

5. CREATING A SAFEGUARDING CULTURE

It is our aim to foster an effective safeguarding culture deeply embedded in our schools and across our organisation, creating and maintaining a safe learning environment where all children and adults feel safe, secure and valued and know they will be listened to and taken seriously.

We aim to foster a culture where children thrive and EVERY child *feels* and *are* safe and secure, both physically and emotionally, and their well-being is strong, providing firm foundations for their growth as learners.

See our **Trust Effective Safeguarding Culture Model** for further details.

6. STAFF CODE OF CONDUCT

Staff are required to complete an annual declaration to show that they have read and understood the **Staff Code of Conduct**. The Code of Conduct identifies what behaviours are expected of adults who work with pupils. Adults whose practice deviates from this guidance and/or their professional or employment-related code of conduct may bring into question their suitability to work with pupils and disciplinary action may be taken.

It is important that all adults working with pupils understand the appropriate and safe behaviour expected of them. Providing staff with clear guidance will ensure that the school's expectations of Safer Working Practice are reinforced throughout a person's employment.

All staff are expected to disclose relationships either in or out of school and online that may have implications for safeguarding children.

See **Trust Staff Code of Conduct.**

7. THE CURRICULUM

See KCSIE 2026 Part 2 (paragraphs 128 – 133)

KCSIE 2026 "… ensure that children are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities." (paragraph 156)

Children are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities. This enables them to learn to develop the necessary skills to build self-esteem, respect others, defend those in need, resolve conflict without resorting to violence, question and challenge and to make informed choices in later life. The curriculum also enables children to recognise when they are at risk and how to get help when they need it.

Children and young people are encouraged to express and discuss their ideas, thoughts and feelings through a variety of activities and have access to a range of cultural opportunities which promote respect and empathy for others, age-appropriately. There is access to information and materials from a diversity of sources which promote social, spiritual and moral well-being and physical and mental health.

Personal Health and Social Education, Citizenship and Religious Education lessons will provide opportunities for children and young people to discuss and debate a range of subjects including lifestyles, family patterns, religious beliefs and practices and human rights issues.

All pupils will know that there are adults in the school whom they can approach in confidence if they are in difficulty or feeling worried and that their concerns will be taken seriously and treated with respect.

The Governing Body ensures that children are taught about safeguarding, including safeguarding themselves online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through Personal, Social, Health and Economic education (PSHE), and through Relationship and Sex Education (RSE).

8. SAFER USE OF THE INTERNET AND DIGITAL TECHNOLOGY

See KCSIE 2026 Part 2 (paragraphs 162 – 175)

KCSIE 2026: "It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers a school … to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate." (paragraph 162)

KCSIE 2026: "… governing bodies … should ensure their school … has appropriate filtering and monitoring systems in place ensure that a review of their effectiveness is carried out at least once every academic year... They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified" (paragraph 171)

See **Appendix 9** and our **Trust Online Safety, Trust Acceptable Use, Trust Social Media and Trust Internet Filtering and Monitoring Policies, Trust Information Security Policy**

9. SAFER RECRUITMENT AND SELECTION OF STAFF

See KCSIE 2026 Part 3: (paragraphs 283 – 430)

The school's recruitment and selection policies and processes adhere to the DFE guidance set out in 'Keeping Children Safe in Education - Statutory guidance for schools and colleges', Sept 2026 and any subsequent updates.

KCSIE 2026: "It is vital that as part of their whole school ... approach to safeguarding governing bodies ... create a culture that safeguards and promotes the welfare of children in their school ... As part of this culture, it is important that they adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools ..." (paragraph 285)

Senior leaders, the Trust Board and the governing body ensure that stringent recruitment and vetting procedures are in place for staff and other adults, and that nobody commences work unless all necessary checks are complete to a satisfactory level. The same rigour is applied when appointing volunteers.

See **Trust Safer Recruitment and Selection Policy, Trust Volunteers in School Policy.**

10. DISQUALIFICATION

See KCSIE 2026 Part 3 (paragraphs 268 – 272)

KCSIE 2026: "For staff who work in childcare provision, or who are directly concerned with the management of such provision, employers need to ensure that appropriate checks are carried out

to ensure that individuals are not disqualified under the Childcare Disqualification Regulations 2018. (paragraph 343)

KCSIE 2026: "Further information on the staff to whom these Regulations apply, the checks that should be carried out, and the recording of those checks can be found in Disqualification under the Childcare Act 2006." (paragraph 344)

The school will implement the 2018 Childcare Disqualification Regulations by asking that staff to self-declare if they are disqualified under the Childcare Act 2006 are not able to work in an early years setting within the school (See **Appendix 10**).

11. POSITION OF TRUST

All school staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a child under 18 may be a criminal offence, even if that child is over the age of consent.

See **Staff Code of Conduct.**

12. SAFEGUARDING PROFESSIONAL LEARNING PROGRAMME

Learning about safeguarding is given a high priority. Expertise is extended effectively and internal capacity is built up. Headteachers ensure that staff regularly undertake a comprehensive range of learning to promote safe practice in classrooms, around the school and off site.

A variety of learning materials on safeguarding are made available in school to ensure staff continually develop their understanding and practice around safeguarding. All learning and training are documented as part of the member of staff's Professional Learning Record, which also helps us map learning needs across the staff team for further development. A checklist is used as part of the induction process, and thereafter in the performance management process to ensure all compulsory learning has taken place.

Safeguarding is re-visited regularly to ensure staff are as confident and competent in carrying out their safeguarding responsibilities as they possibly can be.

As and when required, other external agencies may be consulted to assist with staff learning and development.

See **Volunteers in School Policy, Staff Safeguarding Professional Learning Programme, Staff Safeguarding Induction Programme**

13. MANAGEMENT OF SAFEGUARDING IN SCHOOL

In the event of a disclosure or child protection/safeguarding concern, options include:

- managing any support for the child internally via the school's own pastoral support processes;
- an early help assessment;
- a referral for statutory services, for example as the child is in need or suffering or likely to

KCSIE 2026: "Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help.

All school and college staff should be particularly alert to the potential need for additional support for a child who:

- **is disabled or has certain health conditions and has specific additional needs**
- **has special educational needs (whether or not they have a statutory Education, Health and Care plan)**
- **has a mental health need**
- **is a young carer**
- **is pregnant and/or is a parent themselves**
- **has exhibited early signs of abusive, violent and/or harmful behaviours**
- **is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines**
- **is frequently missing/goes missing from education, home or care**
- **has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation**
- **is at risk of being radicalised into terrorism**
- **has a parent or carer in custody, or is affected by parental offending**
- **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 alcohol and other drugs themselves**
- **is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage**
- **is a privately fostered child.“ (paragraph 17)**

If a child is in immediate danger or is at risk of harm, a referral will be made to Trafford Council’s Multi-Agency Referral & Assessment Team/TRAFFORD CHILDREN’S FIRST RESPONSE (children’s social care) and/or the police immediately. Anyone can make a referral. Contact details for TRAFFORD CHILDREN’S FIRST RESPONSE can be found in Section 28.

14. RECORDING AND REPORTING CONCERNS

See KCSIE 2026 Part 1 (paragraphs 56 – 57)

All staff, volunteers and visitors have a responsibility to report any concerns about the welfare and safety of a child and all such concerns must be taken seriously. If a concern arises all staff, volunteers and visitors must:

- speak to the Designated Safeguarding Lead (DSL) or the person who acts in their absence
- agree with this person what action should be taken, by whom and when it will be reviewed
- all concerns about a child or young person should be reported without delay and recorded using the school’s agreed CPOMs system. Records should be descriptive, evidence based and include actions and outcomes.
- parents and carers will not be informed prior to referral if doing so may jeopardise a police investigation.

There are always opportunities for children to speak out if they are upset and worried about themselves or another person:

- Speak to a familiar adult (e.g. classteacher, TA)
- Speak to a member of the pastoral team
- Speak to a member of the leadership team

When a child makes a disclosure to a member of staff they must:

- take the child seriously
- provide reassurance that they have done the right thing
- use open questions to clarify or explore potential concerns (TED: tell, explain describe) (4Ws – what? Where? When? Who?)

See **Appendix 12 f**or further information about what to do and how to respond if a child discloses abuse.

15. CONFIDENTIALITY AND INFORMATION SHARING

See KCSIE 2026 Part 2 (paragraphs 138 – 150)

With effect from 25 May 2018, the statutory General Data Protection Regulations came into force. The school has developed a set of relevant and appropriate documents which are all available on the school's website. All data is maintained and managed in line with school GDPR policies and the agreed retention schedule (see separate GDPR policies).

Staff ensure that confidentiality protocols are followed, and information is shared appropriately. The Headteacher or Designated Member of Staff discloses any information about a pupil to other members of staff on a need-to-know basis only. Information sharing procedures are based on the guidance document 'Information sharing: advice for practitioners providing safeguarding services' 2018.

KCSIE 2026: "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. 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." (paragraph 145)

All staff and volunteers must understand that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff and volunteers must be clear with children that they cannot promise to keep secrets.

Staff are aware that in a Child Protection/Safeguarding disclosure they must not agree to keep a secret or remain confidential to a child. They are duty bound to share this information with the DSL.

See **Trust Data Protection Policy, Trust Information Sharing Policy** for further information.

16. INFORMING PARENTS/CARERS

Our approach to working with parents/carers is one of transparency and honesty and our responsibility is to safeguard and promote the welfare of all the children in our care. We aim to do this in partnership with our parents/carers. In most cases parents and carers will be informed when concerns are raised about the safety and welfare of their child. Parents and carers should be given the opportunity to address any concerns raised.

Parents and carers will be informed if a referral is to be made TRAFFORD CHILDREN'S FIRST RESPONSE or any other agency.

Parents/carers will not be informed if it is believed that by doing so would put the child at risk. In such cases the Designated Safeguarding Lead or Headteacher will seek advice from TRAFFORD CHILDREN'S FIRST RESPONSE.

17. RECOGNISING SIGNS OF CHILD ABUSE

See KCSIE 2026 Part 1 (paragraphs 24 – 48)

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another

Abuse: 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

See **Appendix 2** for Recognising Signs of Abuse

18. CHILDREN POTENTIALLY AT GREATER RISK OF HARM

See **Appendix 3** for further information about children potentially at greater risk of harm:

- Children who need a social worker
- Children who are Absent from Education (See **Trust Children who are Missing or Absent from Education Policy**)
- Children requiring mental health support
- Children with SEND (see **School SEND Policy**)
- Looked After Children (see **Trust Looked After Children Policy**)

19. CONTEXTUAL SAFEGUARDING

KCSIE 2026: "All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families." (paragraph 20)

This recognises that children, especially as they move into adolescence, are involved in wider social contexts beyond home and school. This can include public places where children and their peers 'hang out', in parks, on public transport etc, but which may present increased risk of child sexual exploitation, peer on peer abuse, teenage relationship abuse, radicalisation, involvement in gangs or other forms of abuse.

Contextual safeguarding acknowledges that safeguarding incidents that present in school may well be related to risks outside both the setting and even the home/family environment. We should also be aware of the 'digital context' – children may frequent places and communities online that are as risky as some physical locations. Such risks include (but are not limited to) sexual exploitation, criminal exploitation and serious youth violence, sometimes in combination.

It's important that we have an awareness of and assess the risks beyond the home and seek to ensure that interventions help to protect children in whatever contexts they find themselves.

Contextual safeguarding is not simply about the child, however. It is about ensuring the context (the park, the shopping centre, public transport etc) is subject to a child protection assessment and intervention. For more information on this see the NSPCC guidance, CONTEXTUAL SAFEGUARDING

20. SPECIFIC CHILD PROTECTION/SAFEGUARDING CONCERNS

See KCSIE 2026 Part 1 (paragraphs 29 – 52), Appendix B

See **Appendix 4** for further information and procedures about:

- Domestic Abuse (and Appendix 12a for Encompass Procedures)
- Forced Marriage

- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- Child Marriage (CM)
- Female Genital Mutilation (FGM)
- Radicalisation and Extremism (see **Appendix 6**)
- Upskirting
- Private Fostering
- Child on Child Abuse (see **Appendix 7**)

The school assesses the risks and issues in the wider community when considering the well-being and safety of its pupils.

21. CHILD PROTECTION CONFERENCES AND CORE GROUP MEETINGS

Members of staff are likely to be asked to attend a child protection conference or other relevant core group meetings about an individual pupil and will need to have as much relevant updated information about the child as possible. A child protection conference will be held if it is considered that the child/children are suffering or at risk of significant harm.

All reports for a child protection conference should be prepared in advance of the meeting and will include information about the child's physical, emotional, intellectual development and well-being as well as relevant family related issues. This information will be shared with the parents/carers.

Staff dealing with child protection concerns and/or attending core group/conferences should receive supervision/debriefing opportunities to ensure their emotional and mental health and well-being.

22. SAFER WORKING PRACTICE

The school expects staff and volunteers to set a good example to pupils through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.

See **Trust Staff Code of Conduct, Trust Low Level Concerns Policy** and **Trust Volunteer in School Policy**

23. ALTERNATIVE PROVISION

- *See KCSIE 2026 Part 3: (paragraphs 402)*

KCSIE 2026 clarifies safeguarding responsibilities when a child is placed in AP. Schools must:

- Obtain written confirmation that safeguarding checks have been completed on AP staff
- Be informed of any staff changes that could affect pupil safety
- Keep accurate records of the child's location (address and any satellite sites)
- Review placements regularly to ensure the child is attending and the environment is safe

If concerns arise, the school must immediately review and, if necessary, terminate the placement.

24. MANAGING ALLEGATIONS AND CONCERNS AGAINST PROFESSIONALS WHO WORK WITH CHILDREN

See KCSIE 2026 Part 4, Section 1 (paragraphs 431 – 502)

An allegation is any information which indicated that a member of staff (paid, supply or voluntary) may have:

- Behaved in a way that has or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in such a way that indicates they would pose a risk of harm if they worked regularly or closely with a child; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. In regard to a person's conduct outside school, and need not include a child, for example domestic abuse of a partner.

This applies to any child the member of staff has contact with in their personal or professional life.

See **Appendix 8** for Managing allegations and concerns against professionals who Work with children Procedures.

25. LOW LEVEL CONCERNS

- *See KCSIE 2026 Part 4: Section 2 (paragraphs 503 – 525)*

KCSIE 2026: "The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school ... may have acted in a way that:

- **is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and**
- **does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO" (paragraph 506)**

See **Trust Low Level Concerns Policy**

26. COMPLAINTS OR CONCERNS BY PUPILS, STAFF OR VOLUNTEERS

Any concern or expression of disquiet made by a child will be listened to seriously and acted upon as quickly as possible to safeguard his or her welfare.

We will make sure that the child or adult who has expressed the concern or made the complaint will be informed not only about the action to be taken but also where possible about the length of time required to resolve the complaint. We will endeavour to keep the child or adult informed about the progress of the complaint/expression of concern.

See **Appendix 8** for Managing allegations and concerns against professionals who Work with children Procedures.

27. SERIOUS CASE REVIEWS

The Trafford Strategic Safeguarding Partnership will always undertake a serious case review when a child or young person dies (including death by suicide) and abuse or neglect is known or suspected to be a factor in their death. The purpose of the serious case review is to:

- Find out if there are any lessons to be learnt from the case about how local professionals and agencies work together to safeguard and promote the welfare of children and young people.

- Identify what those lessons are, how they will be acted on and what is expected to change as a result of the serious case review.
- Improve inter-agency working to better safeguard and promote the welfare of children and young people.

If required our schools will provide an individual management report for a serious case review and will cooperate fully with implementing outcomes of the review including reviewing policy, practice and procedures as required.

28. CONTACT DETAILS

Multi-Agency Referral & Assessment Team (TRAFFORD CHILDREN'S FIRST RESPONSE) – Children's Social Care 0161 912 5125 TRAFFORD CHILDREN'S FIRST RESPONSE@trafford.gov.uk	Local Authority Designated Officer (LADO) Anita Hopkins 0161 912 5125 TRAFFORD CHILDREN'S FIRST RESPONSE@trafford.gov.uk
Trafford Strategic Safeguarding Partnership 0161 911 8687 tssp@trafford.gov.uk	Police Non-emergency – 101 Emergency - 999
Out of Hours Emergency Duty Team Social Care 0161 912 2020	NW Counter-Terrorism Unit Channel Team 0161 856 6362 channel.project@gmp.police.uk
National Domestic Abuse Helpline	**Refuge** runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked

Further Information on Safeguarding and Safeguarding Policies can be found on the TSCB Website at www.tscb.co.uk

29. GLOSSARY

A Child	A person who has not yet reached their 18th birthday.
Abuse	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. Children may be abused in a family or in an institutional or community setting by those who know them or, more rarely by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
Bullying & Cyberbullying	Behaviour that is: • Repeated • intended to hurt someone either physically or emotionally • often aimed at certain groups, for example because of race, religion, gender or sexual orientation
Child on Child Abuse	Child on child abuse occurs when a young person is exploited, bullied and / or harmed by another child under the age of 18; everyone directly involved in child-on-child abuse is under the age of 18.
Child Protection	Activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Child Sexual Exploitation	Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity

	(a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years. It can include both contact (penetrative and non-penetrative)and non-contact sexual activity and may occur without the child's or young person's immediate knowledge.
Children with Special Educational Needs and/or disabilities	SEN: a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her. Disability: a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.
Contextual Safeguarding	Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.
County Lines	County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
Criminal Exploitation	Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in **county lines** are missing episodes, when the victim may have been trafficked for the purpose of can affect any child or young person (male or female) under the age of 18 years; • can affect any vulnerable adult over the age of 18 years; • can still be exploitation even if the activity appears consensual; • can involve force and/or enticement • based methods of compliance and is often accompanied by violence or threats of violence; • can be perpetrated by individuals or groups, males or females, and young people or adults; and • is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.
Domestic Abuse	Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: • psychological • physical • sexual • financial • emotional All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Early Help	Intervening early and as soon as possible to tackle problems emerging for children, young people and families with a population most at risk of developing problems. Effective intervention may occur at any point in a child or young person's life.
Emotional Abuse	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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature 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. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Female Genital Mutilation (FGM)	Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.
Gangs & Youth Violence	Defining a gang is difficult, They tend to fall into three categories; peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public places to socialise, and although some peer group gatherings can lead to increased antisocial behaviour and low level youth offending, these activities should not be confused with the serious violence of a Street Gang. A Street Gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity. An organised criminal group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise).
Hate	Hostility or prejudice based on one of the following things: • disability • race • religion • transgender identity • sexual orientation
Honour-Based Abuse	Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.
Low Level Concern	A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that: • is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and • does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to: • being over friendly with children; • having favourites; • taking photographs of children on their mobile phone; • engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or, • using inappropriate sexualised, intimidating or offensive language.
Neglect	Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: • Protect a child from physical and emotional harm or danger. • Ensure adequate supervision (including the use of inadequate care-givers). • Ensure access to appropriate medical care or treatment. • It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
Physical Abuse	A form of abuse which 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.
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. There is a mandatory duty to inform the local authority of children in such arrangements.
Radicalisation & Extremism	Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of armed forces as extremism.
Relationship Abuse	Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.
Safeguarding and promoting the welfare of children	Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: • protecting children from maltreatment; • preventing the 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; and • taking action to enable all children to have the best outcomes
Sexting	Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages.
Sexual Abuse	Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children
Sexual Exploitation	CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
Terrorism	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 must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological state.
Trafficking	Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.
Upskirting	Upskirting is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.

APPENDICES

Appendix 1: Specific Safeguarding responsibilities

Appendix 2: Recognising Signs of Child Abuse

Appendix 3: Children potentially at greater risk of harm

Appendix 4: Specific Child Protection/Safeguarding Concerns

Appendix 5: Operation Encompass Procedure

Appendix 6: Radicalisation and Extremism

Appendix 7: Child-on-Child Abuse Procedures

Appendix 8 - Managing allegations and concerns against professionals who work with children

Appendix 9 – Safer Use of the Internet and Digital Technology

Appendix 10 – Staff Disqualification statement

Appendix 11 – TSCB Threshold Chart

Appendix 12 – What to say to a child and how to respond

Appendix 1

Safeguarding Responsibilities

Headteacher

The **Headteacher** is responsible for:

- Identifying a senior member of staff from leadership team to be the Designated Safeguarding Lead (DSL).
- Identifying alternate members of staff to act as the Deputy Designated Safeguarding Lead (DDSL) in his/her absence to ensure there is always cover for the role.
- A Designated Safeguarding Lead for child protection is identified and receives appropriate on-going training, support and supervision.
- The policies and procedures adopted by the Trust Board/Governing Body to safeguard and promote the welfare of pupils are fully implemented and followed by all staff including volunteers;
- Safe recruitment and selection of staff and volunteers is practised.
- Ensure safeguarding responsibilities are fulfilled when a child in placed in an Alternative Provision (AP)
- Sufficient time and resources are made available to enable the Designated and Deputy Designated Safeguarding Leads to discharge their responsibilities, including attending inter-agency meetings, contributing to the assessment of children and young people, supporting colleagues and delivering training as appropriate.
- All staff and volunteers receive appropriate training which is updated annually.
- All temporary staff and volunteers are made aware of the school's safeguarding policy and arrangements.
- All staff and volunteers feel safe about raising concerns about poor or unsafe practice regarding the safeguarding and welfare of the children and young people and such concerns will be addressed sensitively and effectively.
- Parents/carers are aware of and understand the school's responsibilities to promote the safety and welfare of its pupils by making its obligations clear in the school/setting prospectus.
- Appropriate safeguarding responses are in place for children who are absent from school or who go missing from education, particularly on repeat occasions.
- The Attendance Lead regularly liaises with the Designated Safeguarding Leads and classteachers to discuss all persistently absent pupils and those who go missing to identify the risk of abuse and neglect including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm.

Safeguarding Responsibilities

<u>Trust Board</u>

The **Trust Board** is responsible for:

- Identifying a member of the Trust Board as the designated trustee for Safeguarding and receives appropriate training. The identified trustee will provide the Trust Board with appropriate information about safeguarding and will liaise with the Head of Trust and Designated Safeguarding Leads.
- The Trust's Safeguarding and Child Protection Policy is reviewed annually and updated, and the school complies with local safeguarding procedures.
- The Trust operates safe recruitment and selection practices including appropriate use of references and checks on new staff and volunteers.
- There are Safeguarding and Child Protection Policies together with a Staff Code of Conduct and a Whistleblowing Policy.

- The Trust has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned.
- Any weaknesses in Child Protection are remedied immediately.
- A named trustee for safeguarding, is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Head of Trust.
- Safeguarding and Child Protection policies and procedures are reviewed annually and that the Safeguarding and Child Protection policy is available on the Trust website. Parents/carers are made aware of this policy and their entitlement to have a copy of it via the school / website.
- Enhanced DBS checks are in place for all Trustees and Local Governing Body members.
- Our Trustees will also undertake appropriate training to ensure they are able to carry out their duty to safeguard all of the children at our schools.
- Ensure all schools have appropriate internet filtering and monitoring systems in place and regularly review their effectiveness and ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place for internet safety/cyber security and manage them effectively and know how to escalate concerns when identified.

Safeguarding Responsibilities

<u>Local Governing Body</u>

The Local Governing Body of the school will ensure that:

- A member of the Local Governing Body is identified as the designated governor for Safeguarding and receives appropriate training. The identified Governing Body member will provide the Governing Body with appropriate information about safeguarding and will liaise with the Designated Safeguarding Lead member of staff.
- A senior leader has Designated Safeguarding Lead responsibility.
- The school's safeguarding policy is reviewed annually and updated, and the school complies with local safeguarding procedures.
- The school operates safe recruitment and selection practices including appropriate use of references and checks on new staff and volunteers.
- All staff and volunteers who have regular contact with children and young people receive appropriate training which is updated by refresher training every year.

- A senior member of staff from leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is a deputy DSL(s) who is appropriately trained member to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be cover for this role.
- On appointment, the Designated Safeguarding Lead undertakes interagency training, at Level 4, and undertakes an 'update' course every 2 years. In addition to formal training, DSL will ensure that they update their knowledge and skills at regular intervals but at least annually, to keep up with any developments relevant to their role.
- Any weaknesses in Child Protection are remedied immediately.
- A member of the Local Governing Body, usually the Chair, is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Headteacher.
- Parents/carers are made aware of this policy and their entitlement to have a copy of it via the school website.
- The Local Governing Body considers how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and/or for maintained schools through sex and relationship education (SRE).
- Enhanced DBS checks are in place for all Local Governing Body members.
- Our Local Governing Bodies will also undertake appropriate training to ensure they are able to carry out their duty to safeguard all the children at our school.
- Ensure the school has appropriate internet filtering and monitoring systems in place and regularly review their effectiveness and ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place for internet safety/cyber security and manage them effectively and know how to escalate concerns when identified.

Safeguarding Responsibilities

Designated Safeguarding Lead

The **Designated Safeguarding Lead (DSL)** has a specific responsibility for championing the importance of safeguarding and promoting the welfare of children and young people registered in the school. The Designated Safeguarding Lead must be a member of the Senior Leadership Team of the school.

The Designated Safeguarding Lead is the first point of contact for external agencies that are pursuing Child Protection investigations and co-ordinates the school's representation at Child Protection Conferences and any other relevant meetings (including the submission of written reports for conferences). When an individual concern/incident is brought to the notice of the Designated Safeguarding Lead, they will be responsible for deciding upon whether or not this should be reported to other agencies as a safeguarding issue.

KCSIE 2026: "The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns." (paragraph 9)

Arrangements are in place to ensure that at least one of the DSL trained persons in school is available when children are taking part in school led activity, this includes before and after school clubs and other extra-curricular activities.

The **Designated Safeguarding Lead** will:

- Act as the first point of contact with regards to all safeguarding matters.

- Attend up-dated training every two years.
- Provide relevant information to the Trust Board and LA on how the school carries out its safeguarding duties.
- Provide support and training for staff and volunteers.
- Ensure that the school's actions are in line with the TSCB Safeguarding Inter-Agency Procedures. (Guidance on these procedures may be found on the TSCB website at www.tscb.org.uk).
- Refer a child if there are concerns about possible abuse, to the Local Authority, and acting as a focal point for staff to discuss concerns. Referrals should be made in writing, following a telephone call using a Single Agency Referral Form (SARF).
- Keep copies of all referrals to TRAFFORD CHILDREN'S FIRST RESPONSE and any other agencies related to safeguarding children (CPOMs).
- Ensure that all staff and volunteers receive information on safeguarding policies and procedures from the point of induction.
- Ensure that any staff with specific responsibility for safeguarding children receive Level 2 and above training.
- Manage and keep secure the school's safeguarding records.
- Ensure that all staff and volunteers understand and are aware of the school's reporting and recording procedures and are clear about what to do if they have a concern about a child.
- Keep a declaration form/record to show that staff have read and understood specific safeguarding resources/materials.
- Liaise with the Headteacher about any safeguarding issues.
- Keep up to date with changes in local policy and procedures and are aware of any guidance issued by the DfE concerning Safeguarding.
- Send a pupil's child protection or safeguarding file separately from the main file to a new establishment if a pupil leaves the school. Only keep a copy of the file in line with GDPR retention.
- Provide, with the Headteacher, a termly report for the governing body, detailing any changes to the policy and procedures; training undertaken by the Designated Safeguarding Lead, and by all staff and governors; number and type of incidents/cases, and number of children on the child protection register (anonymised).
- During term time the designated safeguarding lead and/ or a deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. If in *exceptional* circumstances, a DSL is not available on the school site in person, we will ensure that they are available via telephone and any other relevant media.
- Lead responsibility for the school's Internet Filtering and Monitoring systems and liaising with external providers to ensure all statutory requirements are fully met.

Safeguarding Responsibilities

Staff

- Be aware and have an understanding of this Policy and their school's procedures relating to Child Protection and Safeguarding.
- Read and familiarise themselves with Part 1 of 'Keeping Children Safe in Education 2026'.
- Recognise and understand the indicators of abuse including online.
- Know what to do if they are concerned about a child's welfare.
- Undertake the appropriate safeguarding training as highlighted within this policy.
- Be aware of procedures for promoting good behaviour and managing behaviour.
- Know they may raise concerns directly with Children's Social Care services.
- Be aware of procedures for children missing and/or absent from education.
- Be aware that safeguarding incidents could happen anywhere, and staff should be alert to possible concerns being raised in this school.
- Be aware that safeguarding concerns about adults in the school should be made to the Designated Safeguarding Lead or to the Headteacher.
- Provided with child protection awareness information at induction, including in their arrival pack, the school safeguarding statement so that they know who to discuss a concern with.
- Trained in and receive regular updates in online safety and reporting concerns.

KCSIE 2026: "Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child." (paragraph 55)

KCSIE 2026: "If staff have any concerns about a child's welfare, they should act on them immediately." (paragraph 56)

KCSIE 2026: "If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken" (paragraph 59)

Appendix 2

Recognising Signs of Child Abuse

1. CATEGORIES OF ABUSE

All staff are aware of the categories of abuse, which are:

The definitions of which can be found below and in the glossary, and signs and symptoms of the four categories of abuse can be found below and in Appendix 3.

Staff are also made aware of other key safeguarding topics:

The definitions of the above can be found in the glossary. Information and learning relating to the above topcs is shared in school, but staff are also encouraged to undertake their own learning. More information in relation to staff training etc. can be found in the 'Staff learning and development' section of this policy.

2. SIGNS OF ABUSE IN CHILDREN

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Child Sexual Exploitation.

3. RISK INDICATORS

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

4. RECOGNISING PHYSICAL ABUSE

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

Bruising

Children can have accidental bruising, but the following must be considered as non- accidental unless there is evidence, or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)

- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, handprints or a hairbrush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures. There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

Scars

Many scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

5. RECOGNISING EMOTIONAL ABUSE

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse. The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach

- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self- esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

6. RECOGNISING SIGNS OF SEXUAL ABUSE

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child’s age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self- mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

7. SEXUAL ABUSE BY YOUNG PEOPLE

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.

This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Incidents of peer-on-peer abuse may need to be dealt with in various ways, incidents of bullying will be dealt with via the school's Kindness Policy and Behaviour Policy. Incidents which take place outside of school may need to be addressed in school however the school are clear that where professional advice needs to be sought, it will be. The schools DSL will consult TRAFFORD CHILDREN'S FIRST RESPONSE on matters relating to the safety and welfare of a child and will consult the police in respect of matters relating to a possible crime.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies

Consent – agreement including all the following:

- Understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society's standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence

Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

8. RECOGNISING NEGLECT

Evidence of neglect is built up over a period and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and irresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

KCSIE 2026: "Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact of all forms of domestic abuse." (Paragraph 24)

Appendix 3

Children Potentially at Greater Risk of Harm

Whilst all children should be protected, it is important that we recognise that some children are potentially at greater risk of harm:

1. **CHILDREN WHO NEED A SOCIAL WORKER** (Child in Need and Child Protection Plans)

We recognise that when a child has a social worker, it is an indicator that the child is more at risk than other pupils. This may mean they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

KCSIE 2026: "Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health." (paragraph 215)

2. **CHILDREN WHO ARE ABSENT FROM EDUCATION**

KCSIE 2025: "Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school's ... response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. (paragraph 219)

See Children who are Absent or missing from Education Policy for further information

3. **ELECTIVE HOME EDUCATION**

We recognise that parents have the right to educate their child at home where this is a suitable and appropriate educational provision. In accordance with *Keeping Children Safe in Education 2026*, we understands that the decision to home educate may, in some circumstances, be linked to safeguarding concerns. Where a child is being withdrawn from school for elective home education, the school will work with parents, the local authority and other relevant agencies as appropriate, particularly where the child has an Education, Health and Care (EHC) Plan, is subject to a Child Protection Plan, is a Child in Need, or where there are other known vulnerabilities. Any safeguarding concerns will be referred to the Designated Safeguarding Lead (DSL) and shared with relevant agencies in line with statutory guidance and information-sharing procedures. The school will notify the local authority of all pupils who are removed from roll for elective home education in accordance with legal requirements and will ensure that all relevant safeguarding information is passed on to support the child's ongoing welfare and educational needs.

4. **CHILDREN REQUIRING MENTAL HEALTH SUPPORT**

KCSIE 2026: "Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one." (paragraph 46)

KCSIE 2026: "Schools ... have an important role to play in supporting the mental health and wellbeing of their pupils." (paragraph 224)

KCSIE 2026: "All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation." (paragraph 225)

We recognise that children's mental health and wellbeing are vital to their overall safety, development and ability to learn. In line with KCSIE 2026, we understand that mental health concerns can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, exploitation or other adverse experiences.

All staff are alert to signs that a child's mental health may be affecting their welfare and are expected to report concerns in accordance with the school's safeguarding procedures. Through our nurturing ethos, pastoral support, PSHE curriculum and positive relationships, we promote emotional wellbeing, resilience and help-seeking behaviours, ensuring that children know where to access support when they need it.

5. **CHILDREN WITH SEND (SEE LEARNING DIFFERENCES/SEND POLICY)**

KCSIE 2026: We recognise the vulnerabilities of children with SEND particularly with relation to the following:

- **assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further explanation;**
- **the potential for SEND children to be disproportionately impacted by behaviours such as bullying without showing signs;**
- **the specific barriers to communication for children with SEND.**
- **these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children,**
- **the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs,**
- **communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse,**
- **the need for intimate care or that these children are isolated from others,**
- **that these children are more likely to be dependent on adults for care, and**
- **these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so." (paragraph 247)**

For several reasons, children with disabilities are more vulnerable to abuse than others. For these reasons, it is essential that rigorous safe recruitment procedures are in place, especially with regard to recruitment checks on volunteers and paid workers, whistle blowing policies, and having clear guidelines setting out acceptable behaviour by those working with children with disabilities.

6. **LOOKED AFTER CHILDREN** **(See Looked After Children Policy)**

KCSIE 2026: "A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group." (paragraph 236)

KCSIE 2026: "Governing bodies of maintained schools and proprietors of academies must appoint a designated teacher and should work with local authorities to promote the educational achievement of registered pupils who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales." (paragraph 237)

7. YOUNG CARERS

KCSIE 2026: "Schools ... should be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services." (paragraph 246)

8. CHILDREN WITH MEDICAL CONDITIONS

KCSIE 2026: "The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition." (paragraph 250)

We recognise that children with medical conditions may be more vulnerable to abuse, neglect and other safeguarding concerns. We will work with parents, carers, healthcare professionals and other agencies to ensure that appropriate support is in place to meet pupils' medical needs and promote their welfare. Staff will be aware of the additional vulnerabilities some children with medical conditions may face and will report any safeguarding concerns promptly in line with the school's child protection procedures.

9. CHILDREN WHO ARE LESBIAN, GAY OR BISEXUAL

KCSIE 2026: "A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. Schools and colleges should consider how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place." (paragraph 251)

10. CHILDREN WHO ARE QUESTIONING THEIR GENDER

We recognise that children who are questioning their gender may require sensitive, respectful and individualised support. In accordance with KCSIE 2026, the welfare, safeguarding and best interests of the child will be the primary consideration in all decisions. The school will consider each case individually, taking account of the child's age, developmental stage, needs and circumstances, with decisions led by the Designated Safeguarding Lead (DSL) and senior leaders where appropriate. Parents/carers will normally be involved in discussions and decision-making unless doing so would place the child at risk of significant harm.

The Trust is committed to providing a safe, inclusive and respectful environment for all pupils. Any form of bullying, harassment, discrimination or victimisation related to gender questioning, gender identity, sex,

disability, race, religion, sexual orientation or any other protected characteristic will be taken seriously and addressed promptly through the Trust's behaviour, anti-bullying and safeguarding procedures. Staff will actively promote respect, dignity and kindness and will provide appropriate support for any child experiencing bullying or vulnerability.

Where a child requests changes to how they are treated at school, including matters relating to social transition, these requests will be considered carefully on a case-by-case basis, taking account of safeguarding responsibilities, the rights and welfare of the child concerned, parental views, and the impact on other pupils. The school will maintain appropriate records of decisions and the rationale for them.

In line with KCSIE 2026, pupils will normally use the facilities designated for their biological sex, including toilets, changing rooms and residential accommodation arrangements. Participation in sporting activities will also be considered in accordance with statutory guidance, health and safety requirements, fairness, privacy, dignity and the welfare of all pupils. Where appropriate, alternative arrangements may be considered to support individual pupils while maintaining the safety, privacy and rights of others.

All staff must remain vigilant to safeguarding concerns and follow the school's child protection procedures if a child's presentation, disclosures or circumstances give rise to concerns about their wellbeing, mental health, exploitation, abuse or other forms of harm. The school will work with parents, the local authority and relevant professionals to ensure that children who are questioning their gender receive appropriate support and protection.

See KCSIE paragraphs 252 - 28

Appendix 4

Specific Safeguarding / Child Protection Concerns

1. **DOMESTIC ABUSE**

KCSIE 2026: "Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside the home" (page 161)

Children and young people react to domestic abuse in similar ways to other types of abuse and trauma.

KCSIE 2026: "All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result." (page 161)

KCSIE 2026: "Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact of all forms of domestic abuse, including where they see, hear or experience its effects." (Paragraph 24)

Information about Domestic Abuse and its effect upon children and young people will be incorporated into staff Safeguarding and Child Protection training and briefings and the school's Safeguarding and Child Protection's Policies and Procedures will be used to protect children and young people exposed to, and at risk from, domestic abuse.

Any child or young person thought to be at immediate risk will be reported without delay to TRAFFORD CHILDREN'S FIRST RESPONSE or the Emergency Duty Team will be contacted as soon as possible.

The school has opted in to Trafford's Operation Encompass. This is a scheme that provides a method of sharing information regarding domestic abuse between Greater Manchester Police, Trafford Council and Schools, and enables the Designated Safeguarding Lead to be provided with information, explaining that a child was present in a household at the time that an incident of domestic abuse was recorded as having taken place. (See TCSB Encompass Procedure). The process for sharing information through Operation Encompass can be found in Appendix 5.

2. **CHILD MARRIAGE**

The school is sensitive to differing family patterns and lifestyles and child-rearing patterns that vary across different racial, ethnic and cultural groups. Forced marriage is a form of child, adult and domestic abuse and, in line with statutory guidance, is treated as such by this school. Child abuse cannot be condoned for religious or cultural reasons.

Information about Child Marriage will be incorporated into staff Safeguarding and Child Protection training and briefings and the school's Safeguarding and Child Protection Policies will be used to protect a victim or potential victim of forced marriage.

If a case of child marriage is suspected, parents and carers will not be approached or involved about a referral to any other agencies.

3. **CHILD CRIMINAL EXPLOITATION (CCE)**

KCSIE 2026: "Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or 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 and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children,

both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation." (paragraph 36)

KCSIE 2026: "Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others." (paragraph 37)

4. **CHILD SEXUAL EXPLOITATION (CSE)**

KCSIE 2026: "CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. (paragraph 40)

KCSIE 2026: "CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. (paragraph 41)

KCSIE 2026: "CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex... Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship." (paragraph 42)

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in their dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime

- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault

5. **CHILD MARRIAGE**

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party.

6. **FEMALE GENITAL MUTILATION (FGM)**

We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBV they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

KCSIE 2026: "Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police." (paragraph 44)

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: 'Mandatory Reporting of Female Genital Mutilation - procedural information' (October 2015).

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. 4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

Circumstances and occurrences that may point to FGM happening:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

'Mandatory Reporting of Female Genital Mutilation - procedural information', Home Office (October 2015)

The 'One Chance' rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings / schools / colleges take action without delay. There is a mandatory duty on teachers to report disclosures on FGM about a female under 18 personally to the police.

The Serious Crime Act 2015 strengthened further the legislation on FGM and now includes:

- the right to anonymity for victims
- the offence of failing to protect a girl aged under 16 from the risk of FGM
- the provision of Female Genital Mutilation Protection Orders (FGMPO); and

- the duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18.

n.b. for school staff this will occur from a disclosure and not a physical examination

7. RADICALISATION

We seek to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups and extremist Animal Rights movements.

Schools have a statutory duty (Counter Terrorism and Security Act 2015 - The Prevent Duty), in the following areas with the aim of safeguarding pupils from radicalisation, extremism and terrorism:

- Assessing the risk of pupils being drawn into terrorism, including support for the extremist ideas that are part of terrorist ideology.
- Demonstrating that robust safeguarding policies are in place to identify children at risk, and intervening as appropriate
- Ensuring that clear protocols are in place so that any visiting speakers are suitable and appropriately supervised within school.
- Ensuring that fundamental British values are promoted within the curriculum and extra-curricular activities and reflected in the general conduct of the school.
- Schools should promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.
- Ensuring that safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Trafford Safeguarding Children Board (TSCB). This policy describes procedures which are in accordance with government guidance and refers to locally agreed inter-agency procedures put in place by the TSCB.
- Training key staff to give them the knowledge and confidence to identify children at risk of being drawn into terrorism and challenge extremist ideas. They should know where and how to refer children and young people for further help.
- Protecting children from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering.

See Appendix 6

8. CHILD ON CHILD ABUSE

KCSIE 2026: "All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school … and online. All staff should be clear as the school's … policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it." (paragraph 30)

KCSIE 2026: "All staff should understand, that even if there are no reports in their school … it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy)." (paragraph 31)

See Appendix 7

9. UPSKIRTING

KCSIE 2026: "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." (paragraph 35)

10. **PRIVATE FOSTERING**

Private Fostering arrangement is one that is made privately between two parties without the involvement of the Local Authority for a child under the age of 16 (18 if disabled). This arrangement would be with someone who is not a parent or close relative and lasts 28 days or more. Private Fostering is used as a form of childcare by parents who are not able to take care of their child on a day-to-day basis, for whatever reason. However, unreported Private Fostering Arrangements can be used to exploit children.

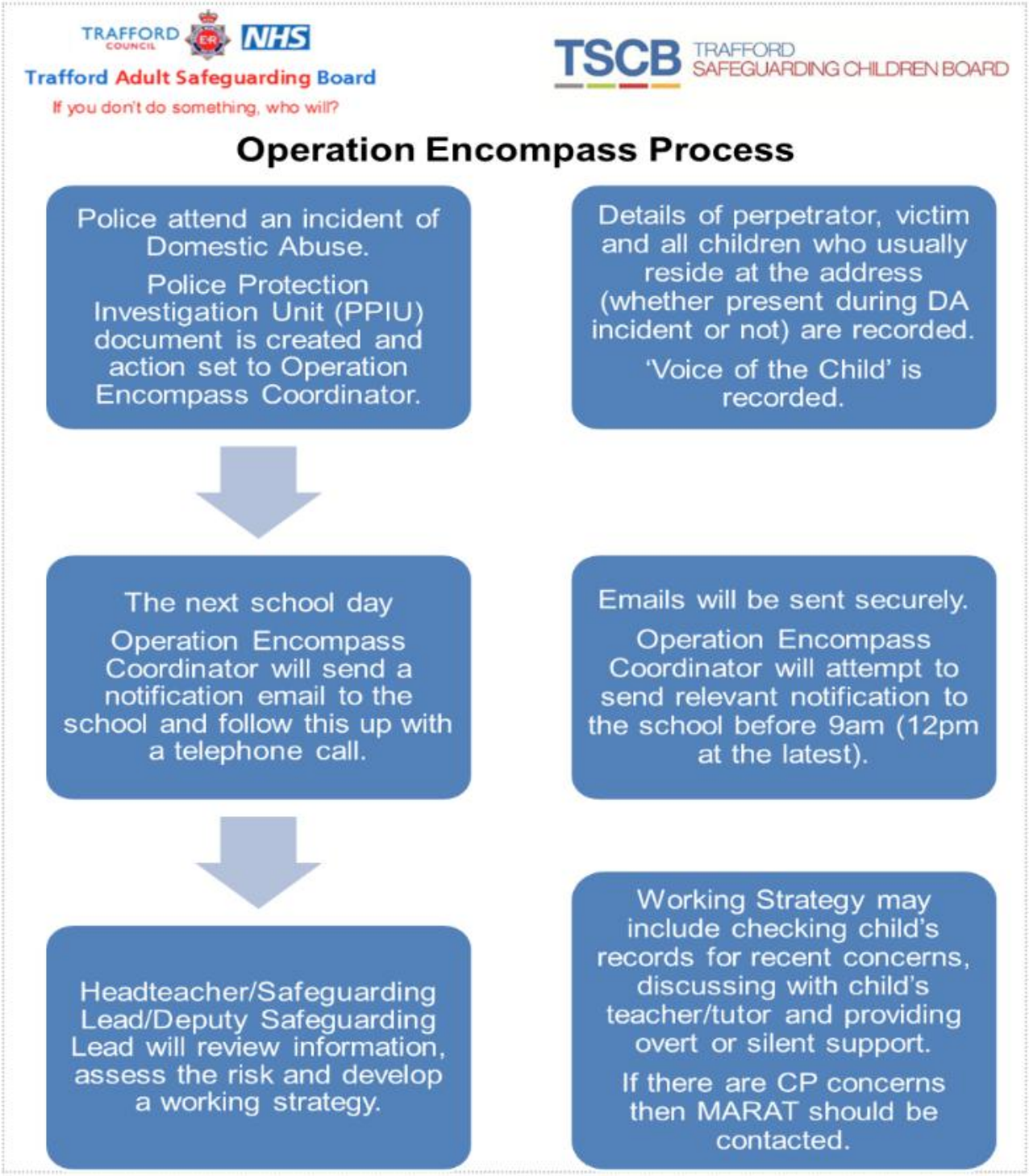
The Law requires that the Local Authority should be informed at least six weeks in advance of a Private Fostering arrangement or 48 hours after the arrangement has been made if in an emergency. Social Workers will:

- Check the suitability of the Private Foster Carers through checks and assessment;
- Make regular visits to the child and monitor the standard of care; and
- Ensure that Private Foster Carers and birth families have all the necessary information and advice they require.

There is a mandatory duty to inform the local authority of children in such arrangements.

Appendix 5

Operation Encompass Flowchart



Appendix 6

Radicalisation and Extremism

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. We will ensure that:

- Through training, staff, volunteers and governors understand what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies
- The DSL has received Prevent training and will act as the point of contact within our school for any concerns relating to radicalisation and extremism
- The DSL will make referrals in accordance with Trafford Channel Procedures and will represent our school at Channel meetings as required
- Guidance and advice provided by the DfE, national and/or local services will be adhered to/considered where appropriate
- Through our curriculum, we promote the spiritual, moral, social and cultural development of pupils

Prevent Duty Referral Protocol

STEP 1 When a concern is identified, as with all safeguarding concerns, the member of staff may seek clarification from the individual but must be careful not to lead or investigate. Details of the concern are shared at the earliest opportunity with one of school's designated named persons for safeguarding. Staff member records on CPOMs.

STEP 2 The designated named person for safeguarding will discuss the concern, (including the relevant context) with the member of staff (the referrer) and document the report.

STEP 3 The DSL to check if any additional concerns are known/documented in the school's safeguarding records, then alert the Headteacher or another designated named person. Jointly they should consider if the concern falls within general safeguarding concerns (see step 4) or if a Prevent referral should be made (see step 5).

STEP 4 School to follow general safeguarding protocols taking action to support and/or make referral to social care (Trafford First Response – 0161 912 5125) where appropriate.

STEP 5 The designated named person for safeguarding to make a referral to the Local Authority safeguarding team. This is usually via the Local Safeguarding partnership or the Multi-Agency Safeguarding Hub (MASH). https://www.traffordsafeguardingpartnership.org.uk/safeguarding-children-and-young-people/Children-in-Specific-Circumstances/Prevent.aspx

STEP 6 After consideration, if warranted, the Local Authority to pass the referral to the Channel co-ordinator for management through to the Local Authority Chaired Channel panel.

STEP 7 The Channel panel convenes to consider support options.

STEP 8 If deemed suitable by the Channel panel a holistic package of support will be determined and delivered. Please note school may be involved as part of the multi-agency support offered.

STEP 9 As with all aspects of safeguarding, even if Channel support is deemed suitable and offered, school retains a duty of care. As such staff should remain vigilant, reporting any new or further concerns to school's designated named persons for safeguarding.

Appendix 7

CHILD-ON-CHILD ABUSE PROCEDURES

1. What is Child on Child Abuse?

Child on child abuse is behaviour by an individual or group of individuals which can be a one-off incident or repeated over time. Child on child abuse is behaviour that intentionally hurts another individual or groups either physically, sexually or emotionally. All child-on-child abuse is unacceptable and will be taken seriously.

All staff should recognise that children are capable of abusing other children.

For the purposes of this policy only, we will use the language of 'victim' and 'perpetrator' for clarity. However, we would ***never*** use this is language in school and ***never*** label a child in this way.

Child on child abuse can take many forms including:

- bullying (including onlincyber bullying)
- physical abuse such as hitting
- relationship abuse
- domestic violence, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (youth produced sexual imagery) and initiation/hazing type violence and rituals
- child sexual exploitation
- youth and serious youth violence
- financial abuse

This abuse can be motivated by:

- perceived differences e.g. on grounds of race, religion, gender, sexual orientation, special educational needs, disability or other differences
- or where a child:
  - is adopted or in care;
  - has caring responsibilities;
  - is suffering from a health problems
  - is frequently on the move (e.g. those from military families or the travelling community);
  - is experiencing a personal or family crisis ;
  - has actual or perceived differences (e.g. physical or cultural differences).

This abuse can result in significant, long lasting and traumatic isolation, intimidation or violence to the victim; vulnerable adults are at particular risk of harm.

We child-on-child abuse is a safeguarding issue for ***both*** victim and alleged perpetrator.

Children or young people who harm others may have additional or complex needs e.g.:

- Significant disruption in their own lives
- Exposure to domestic abuse or witnessing or suffering abuse
- Educational under-achievement
- Involved in crime

Stopping violence and ensuring immediate physical safety is the first priority of any education setting, but emotional bullying can sometimes be more damaging than physical. School staff, alongside their Designated Safeguarding Lead and/or Deputy, have to make their own judgements about each specific case and should use this policy guidance to help.

These types of abuse rarely take place in isolation and often indicate wider safeguarding concerns.

Abusive behaviour can happen to pupils in schools and settings and it is necessary to consider what abuse is and looks like, how it can be managed and what support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm.

There may be reports where the alleged incident is between two pupils from the same or different schools but is alleged to have taken place away from the school premises. The safeguarding principles, and the school's duty to safeguard and promote the welfare of their pupils remain the same regardless of where the incident took place and regardless of whether the incident was online or offline.

Abuse is abuse and will **never** be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Abuse issues can sometimes be gender specific e.g. girls being sexually touched/assaulted, and we recognise that it is more likely that girls will be victims and boys' perpetrators.

We recognise harmful sexual behaviour, sexual violence and sexual harassment may include either misogyny or misandry.

We will not dismiss abusive behaviour between children as 'normal' and our thresholds for investigating claims and allegations are the same as for any other type of abuse.

Preventing violence and ensuring immediate physical safety is our school's first priority but we also acknowledge that emotional abuse can be just as damaging if not more so than physical violence. We recognise that abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of abuse having control over the relationship which makes it difficult for the victim to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

We acknowledge that low level disruption and the use of offensive language can have a significant impact on its target. If left unchallenged or dismissed as 'banter' or 'horseplay', it can also lead to reluctance to report other behaviour.

We also recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

2. What is the difference between Bullying and Child-on-Child Abuse?

Bullying is recognised as a form of child-on-child abuse, but not all bullying incidents will automatically meet the threshold of a safeguarding concern requiring a child protection response. KCSIE 2026 makes clear that children can abuse other children and that abuse can take many forms, including bullying (including cyberbullying), physical abuse, sexual violence, sexual harassment, and prejudice-based abuse.

The key difference is usually the nature, severity, impact and power imbalance involved:

- **Bullying** is typically addressed through a school's behaviour and anti-bullying procedures. It may involve repeated hurtful behaviour, name-calling, exclusion, intimidation or online harassment. While serious and harmful, it does not always indicate that a child is at risk of significant harm

- **Child-on-child abuse** is a safeguarding issue. Behaviour is more likely to be considered abusive where there is coercion, exploitation, violence, sexualised behaviour, significant power imbalance, prejudice-based targeting, or a risk of serious emotional or physical harm. Such concerns require a safeguarding response and consideration by the DSL.

While bullying and child-on-child abuse can overlap, child-on-child abuse is a safeguarding concern that involves one child causing harm, abuse, exploitation or significant distress to another. Bullying may be addressed through the school's behaviour and anti-bullying procedures; however, where behaviour involves a clear power imbalance, prejudice, coercion, sexualised conduct, violence, repeated targeting or significant emotional or physical harm, it will be treated as child-on-child abuse and responded to through the school's safeguarding procedures in line with KCSIE.

3. Responsibility

KCSIE 2026: "All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and

online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it." (paragraph 30)

The guidance emphasises that the voice of the child must be heard and that systems in place in schools are

'…well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously'

4. Framework and Legislation

These procedures are supported by the key principles of the Children's Act, 1989 that the child's welfare is paramount. Another key document is Working Together, 2026, highlighting that every assessment of a child, *'must be informed by the views of the child'.* This is echoed by Keeping Children Safe in Education 2026 through ensuring procedures are in place in schools and settings to hear the voice of the child.

5. Contextual Safeguarding

Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to child-on-child abuse therefore needs to consider the range of possible types of child-on-child abuse set out above and capture the full context of children's experiences. This can be done by adopting a 'contextual safeguarding' approach and by ensuring that our response to incidents of child-on-child abuse takes into account any potential complexity.

This Policy and procedures encapsulate a contextual safeguarding approach, which:

- is an approach to safeguarding children that recognises their experiences of significant harm in extra-familial contexts and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities;
- recognises that as children enter adolescence they spend increasing amounts of time outside of the home in public environments (including on the internet) within which they may experience abuse; and
- considers interventions to change the systems or social conditions of the environments in which abuse has occurred.

6. Abuse and harmful behaviour

It is necessary to consider

- what abuse is and what it looks like
- how it can be managed
- what appropriate support and intervention can be put in place to meet the needs of the individual
- what preventative strategies may be put in place to reduce further risk of harm.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. It is important to consider the forms abuse may take and the subsequent actions required.

- Children are vulnerable to abuse by another child. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.
- Children can abuse other children.

- Staff should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.
- Staff should be aware of the potential uses of information technology for bullying and abusive behaviour between young people.
- Staff should be aware of the added vulnerability of children and young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children.

The alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. Evidence suggests that such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or sexual abuse, may have problems in their educational development and may have committed other offences. They may therefore be suffering, or be at risk of suffering, significant harm and be in need of protection. Any long-term plan to reduce the risk posed by the alleged perpetrator must address their needs.

7. Types of Abuse

There are many forms of abuse that can occur between children and the following list is not exhaustive:

7.01 Physical abuse

Physical abuse may include hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action to take or sanctions to introduce.

This may also include physical assault and harm, or the threat of harm with a weapon.

7.02 Bullying *(including cyberbullying, prejudice-based and discriminatory bullying)*

Bullying is unwanted, aggressive behaviour that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Young people who bully and those who are bullied can have long-term problems.

To be considered as bullying, the behaviour must be aggressive and include:

- an imbalance of power: young people who bully use their power, such as physical strength, access to embarrassing information, or popularity to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- repetition: bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

Details of our anti-bullying strategies and procedures can be found in our **Behaviour Policy** and **Kindness and Anti Bullying Policy.**

7.03 Online bullying (or Cyber Bullying)

Online is the use of technology (social networking, gaming, messaging, text messages, email, chat rooms etc.) to harass threaten or intimidate someone for the same reasons as stated above.

Online bullying can take many forms

- Abusive or threatening texts, emails or messages
- Posting abusive comments on social media sites
- Sharing humiliating videos or photos of someone else
- Stealing someone's online identity
- Spreading rumours online
- Trolling – sending someone menacing or upsetting messages through social networks, chatrooms or games
- Developing hate sites about another person
- Prank calls or messages
- Group bullying or exclusion online
- Anonymous messaging
- Encouraging a young person to self-harm
- Pressuring children to send sexual messages or engaging in sexual conversations

7.04 Bullying which occurs outside the school premises

We will follow the procedures outlined in the Whole School Behaviour Policy and our disciplinary powers to address the conduct of pupils when they are not on school premises and are not under the lawful control or charge of a member of school staff. This may include bullying incidents occurring anywhere off the school premises, such as on school or public transport, off site during lunchtimes, during the evening at weekends or during the school holidays.

Where abuse outside of school is reported to the school, we will investigate and take appropriate action. We will also consider whether it is appropriate to notify the Police if we believe an offence has taken place.

7.05 Sexting (Nudes or Semi Nudes)

This is the consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI.

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude/semi-nude pics' or 'rude pics' or 'nude/semi-nude selfies'. Pressuring someone into sending a nude picture, can happen in any relationship and to anyone, whatever their age, gender or sexual preference. They are often 'shared' via social networking sites and instant messaging services.

Once the image is taken and sent, the sender has lost control of the image and the image could end up anywhere. By having in their possession or distributing to others indecent images of a person under 18, many young people are not aware that they could be committing a criminal offence under the Sexual Offences Act 2003.

Any direct disclosure by a pupil (male or female) will be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves. When an incident involving sexting comes to a school's attention we will follow the guidance as set out in the UKCCIS publication Sexting in Schools and Colleges: Responding to incidents and safeguarding young people.

This must always be referred immediately to the Designated Safeguarding Lead

DSL will follow the gov.uk guidance:

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

Searching, screening and confiscation in schools - GOV.UK

7.06 Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a school or sports team etc. Hazing can also be used as initiation into a street or other 'gang'. There are several different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older or established members of the organisation or 'gang', because they have all experienced this as part of a 'rite of passage'. Many rituals involve humiliation, embarrassment, abuse and harassment.

7.07 Prejudiced or Discriminatory bullying/behaviour

The term prejudiced-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices related to disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity.

7.08 Teenage relationship abuse

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual and/or emotional abuse perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. Abuse can occur online and offline and is never acceptable.

7.09 Sexual violence and sexual harassment between children (see KCSIE 2026 Part 5).

KCSIE 2026: "Harmful sexual behaviour (HSB) can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum137 and may escalate into sexual harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable. (paragraph 527)

Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. We recognise the importance of distinguishing between problematic and abusive sexual behaviour.

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as to the young person it is intended towards.

Sexually harmful behaviour may include

- inappropriate sexual language
- inappropriate role play
- sexual touching
- 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;
- AI-generated content, deepfake images, nudification apps, image-based abuse.

In relation to any reports, disclosures or observations of sexual violence and sexual harassment between children we will:

- make clear that there is a zero-tolerance approach to sexual harassment and sexual violence; that it is never acceptable, and it will not be tolerated and we recognise that failure to do so could lead to a culture of unacceptable behaviour, misogyny, an unsafe environment and in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it;
- recognise that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported;
- recognise the escalatory nature of misogyny and the benefits of early identification to support our approach to minimising the risk of HSB, sexual harassment and sexual violence;
- challenge behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and other private areas of the body - recognising that dismissing or tolerating such behaviours risks normalising them;
- taking a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

Ultimately any decisions on how to proceed with an allegation of sexual violence and sexual harassment will be made on a case-by-case basis with the DSL (or deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the Police as required.

Some situations, however, are statutorily clear:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape;
- rape, assault by penetration and sexual assault are defined in law; and
- creating and sharing sexual photos and videos of under-18s is illegal (see para 3.5 – Sexting). This includes children making and sharing sexual images and videos of themselves.

7.10 Upskirting,

Upskirting is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.

8. Reporting Concerns and Seeking Support

We are committed to ensuring that all children know how to report concerns about child-on-child abuse and feel confident that they will be listened to, supported and taken seriously. Our reporting systems are well promoted, age-appropriate, easy to understand and accessible to all pupils. Children are regularly reminded that they can speak to any trusted adult in school, including class teachers, teaching assistants, pastoral staff, senior leaders and safeguarding leads.

We also provide a range of ways for children to share worries, recognising that some may find it easier to communicate concerns in different ways. Through assemblies, PSHE lessons, safeguarding education and daily interactions, we help children understand what abuse is, how to seek help, and that reporting concerns is a positive and responsible action.

We foster a culture in which children know that they will be heard, supported and protected, and that any concerns they raise will be responded to promptly, sensitively and in line with our safeguarding procedures.

9. Managing the Disclosure

Our initial response to a disclosure from a child is that the disclosure will be taken seriously. All our staff know how to use CPOMS to log the incident, this is a vital and must be done immediately. This is part of gathering critical information from a child relating to their disclosure.

- The member of staff to whom the disclosure is made will reassure the child that they will be supported throughout and kept safe.
- Staff will never assume that someone else is dealing with the alleged incident. If in doubt, they will speak to the Designated Safeguarding Lead (DSL).
- Details of the disclosure will be passed to the DSL immediately or as soon as practically possible on CPOMS.
- The DSL will manage the concern from the member of staff, child or parent.
- The DSL will follow the school's Child Protection procedures which will ensure they gather as much information and context relating to the disclosure as possible. Where necessary, advice will be sought from the TRAFFORD'S FIRST RESPONSE who will advise on how to proceed with the concern.
- Other agencies such as Police and Social Care will be notified and become involved if appropriate.

10. Recognising Child Abuse

An assessment of an incident between child's should be completed and consider:

- Chronological and developmental ages of everyone involved
- Difference in their power or authority in relation to age, race, gender, physical, emotional or intellectual vulnerability
- All alleged physical and verbal aspects of the behaviour and incident
- Whether the behaviour involved inappropriate sexual knowledge or motivation
- What was the degree of physical aggression, intimidation, threatening behaviour or bribery
- The effect on the victim
- Any attempts to ensure the behaviour and incident is kept a secret
- The child or young person's motivation or reason for the behaviour, if they admit that it occurred
- Whether this was a one-off incident, or longer in duration

It is important to deal with a situation of child abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. Avoid language that may create a 'blame' culture and leave a child labelled.

Staff will talk to the children in a calm and consistent manner. Staff will not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.

10.01 Taking Action

- Always take complaints seriously
- Gain a statement of facts from the pupil(s)
- Assess needs of victim and alleged perpetrator
- Consider referral to Police or Social Care
- Contribute to multi-agency assessments

- Convene a risk management meeting
- Record all incidents and all action taken

10.02 Recording sexualised behaviour

- Be clear, explicit and non-avoidant, and avoid vague statements or euphemisms
- Record as soon as possible, as you can quickly forget or confuse detail
- Follow the prompts on your safeguarding and child protection recording form
- Use proper names for body parts but record exactly any language or vocabulary used by the child. Use the child's exact words in quotation marks.
- Note where and when the incident happened and whether anyone else was around.

10.03 Gathering the facts

It is important to gather a broad view of the facts at an early stage.

- Wherever possible, manage the disclosure and subsequent interviews of those involved with two members of staff present (preferably one being the DSL or deputy DSL).
- All those involved in the alleged incident should be spoken to individually and separately.
- Gain a statement of facts from those involved using consistent language and open questions for each account. The easiest way to do this is not to have a line of questioning but to ask the children to tell you in their own words what happened.
- Only interrupt the child to gain clarity with open questions – where, when, why, who. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene? etc.)
- Staff will not promise confidentiality at the initial stage and will inform those involved who the report will be passed on to.
- A written record, via CPOMs, will be made immediately by the person to whom the disclosure is made and passed to the DSL for action.

10.04 Consider the Intent

Has this been a deliberate or contrived situation for a young person to be able to harm another?

10.05 Considering confidentiality and anonymity

Staff will never promise confidentiality as it is likely that it will be in the best interests of the victim to seek advice and guidance from others to provide support and engage appropriate agencies.

We will only engage staff and other agencies that are required to support the children involved or will be involved in any investigation.

If the victim asks the school not to tell anyone about the sexual violence or sexual harassment, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. In this event, the DSL will consider the following:

- parents 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 children's social care via TRAFFORD'S FIRST RESPONSE
- rape, assault by penetration and sexual assaults are crimes. The starting point is that reports should be passed to the Police.

Ultimately, it is for the DSL (or deputy) to balance the victim's wishes against their duty to protect the victim and other children. If the decision is taken to go ahead and report the incident, the reasons should be explained to the victim and appropriate specialist support offered.

Additional information on confidentiality and information sharing is available from DfE advice 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers' and 'NSPCC: Information sharing and confidentiality for practitioners'.

We will do all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment and will carefully consider which staff should know about the report and any support that will be in place for the children involved.

Full consideration will also be given to the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities and the support which may be required by the victim and his/her family should this situation arise.

10.06 Points to consider

- **What is the age of the children involved?**

How old are the young people involved in the incident and is there any age difference between those involved? In relation to sexual exploration, children under the age of 5, in particular 1-4 year olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however, should not be overlooked.

- **Where did the incident or incidents take place?**

Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?

- **What was the explanation by all children involved of what occurred?**

Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?

- **What is each of the children's own understanding of what occurred?**

Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have understanding of the impact of their behaviour on the other person?

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

11. <u>Response to the Disclosure</u>

It is essential that all concerns/allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on the school environment.

Any response will include:

- a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);
- treat all children involved as being at potential risk – whilst the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and at risk of harm themselves. We will ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse and the child who has allegedly been responsible for it.

We will take into account:

- that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address any wider contexts such as the child/children's child group (both within and outside the school); family; the school environment; the experiences of crime and victimisation in the local community; and the child/children's online presence;
- the changes that may need to be made to the above contexts to address the child/children's needs and to mitigate risk;
- the views of the child/children affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with all those involved and their parents and obtain consent to any referral before it is made, unless informing the parent will put the child at risk of harm. Any decision not to inform the parents will generally be made in conjunction with other services such as children's social care and/or the Police, who would take the lead in deciding when the parents should be informed.
- the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

If a pupil is in immediate danger, or at risk of significant harm, a referral to the TRAFFORD'S FIRST RESPONSE (if the pupil is aged under 18) and/or the Police will be made immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made. See Child Protection procedures for additional information.

If a member of staff believes for whatever reason that child may be at risk of or experiencing abuse by their child(s), or that a child may be at risk of abusing or may be abusing their child(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed.

11.01 Internal Management

Where behaviour between children is abusive or violent, the incident will be dealt with using methods set out below. However, where support from local agencies is not available or the incident is considered to be inappropriate or problematic, the school may need to handle allegations/concerns internally. It may be appropriate to handle the incident using the whole school behaviour policy and procedures which includes procedures to be followed in the case of bullying. All concerns, discussions, decisions and reasons for the decisions will be recorded either in writing or electronically. The services of external specialists may be required to support the process.

11.02 Early Help Assessment

Where appropriate and necessary, the school may undertake or contribute to an inter-agency early help assessment with targeted early help services provided to address the assessed needs of a child/children and their family.

11.03 Referral to TRAFFORD'S FIRST RESPONSE

Where a decision is made to make a referral to the TRAFFORD'S FIRST RESPONSE, a strategy meeting is convened, then the school will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it.

11.04 Reporting to the Police

Alleged criminal behaviour will ordinarily be reported to the Police. There are, however, some circumstances where it may not be appropriate to report such behaviour to the Police e.g. where the existence of youth produced sexual imagery does not involve any aggravating factors. All concerns/allegations will be assessed on a case-by-case basis and considering the wider context.

12. Individual Risk and Needs Assessment

Where there is an incident of child-on-child abuse, the school will undertake a robust risk and needs assessment in respect of each child affected by the abuse including the alleged perpetrator. The risk assessment will:

- assess and address the nature and level of risks that are posed and/or faced by the child;
- engage the child's parents and draw upon local services and agencies to ensure that the child's needs are met in the long-term (unless informing the parent will put the child at risk of harm);
- consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child involved; and
- be reviewed at regular intervals in the light of the child's on-going needs to ensure that progress is being made which benefits the child.

If at any stage the child's needs escalate, the DSL should contact the Safeguarding Hub to determine the appropriate course of action.

13. Safeguarding and Supporting the Victim

The following principles are based on effective safeguarding practice and will help our decision-making process regarding safeguarding and supporting the victim. We will:

- consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse;
- consider the needs and wishes of the victim. The victim will be listened to and acknowledged. It is important they feel in as much control of the process as is possible. Where a pupil feels able to deal with the incident on their own or with support of family and friends, the pupils will continue to be monitored and offered support should they require it in the future;
- ensure that the victim will never be made to feel they are the problem for making a report or made to feel ashamed for making a report;
- consider interventions that target a whole class or year group e.g. work on cyberbullying/relationship abuse etc.;
- support the child in improving child group relationships where bullying is a factor in the abuse and consider restorative justice work with all those concerned;
- ensure that sensitive issues are explored through the use of the curriculum (PSHE and Sex and Relationships Education).

14. Safeguarding and Supporting the Alleged Perpetrator

The following principles are based on effective safeguarding practice and will support our decision-making process regarding safeguarding and supporting the alleged perpetrator. In relation to this we will consider:

- how we will continue to provide the alleged perpetrator with an education, safeguarding support as appropriate and implementing any disciplinary sanctions. If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will need to be provided with appropriate support and education whilst off site. Even following the conclusion of any investigation, the behaviour that the pupil has displayed may continue to pose a risk to others in

which case, an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the young person and the risks towards others are measured by all the agencies involved including the pupil and their parents.

- the age and developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of them being the subject of allegations and/or negative reactions by their child's to the allegations made against them.
- the proportionality of the response. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviour in young children may be a symptom of either their own abuse or exposure to abusive practices or materials.

Advice will be sought, as appropriate, from the TRAFFORD'S FIRST RESPONSE, the Police and any other agencies or specialist services in order to commission the right support for the child/children concerned.

15. <u>Sanctions</u>

Before deciding on appropriate action, the school will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child on child abuse and the causes of it.

Sanctions may include additional supervision of the pupil or protective strategies if the pupil feels at risk of engaging in further inappropriate or harmful behaviour.

The school response might include a sanction (in accordance with the Whole School Behaviour Policy and procedures) such as a detention, SLT supervision or fixed-term exclusion to allow the pupil to reflect on their behaviour.

The school will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves or exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this Policy may still be required.

A permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of other children in the school or, where the Head teacher, in their absolute discretion, considered the actions of the pupil(s) has damaged the school's ethos or reputation.

Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the school will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forward.

16. <u>Our Preventative Approach to Child-on-Child Abuse</u>

Our approach to preventing and responding to child-on-child abuse begins long before any incident occurs. We recognise that effective safeguarding is rooted in a strong, values-based culture where our school values are embedded in every aspect of school life and consistently modelled by all members of the school community.

Through the active promotion of kindness, respect, inclusion and empathy, we create an environment in which positive relationships can flourish and children feel safe, valued and able to speak out about concerns. Our PSHE curriculum plays a key role in this preventative approach, ensuring that pupils are proactively taught about healthy relationships, respectful behaviour, personal boundaries, consent, diversity, online safety and how to seek help when needed. By fostering these understandings from an early age, we aim to prevent harmful behaviours, empower children to recognise unacceptable conduct, and build a culture where child-on-child abuse is challenged, reported and addressed effectively.

Our schools:

- ensure school values are embedded within the culture of their school;
- promote a culture of kindness through a relational and restorative approach (See **Behaviour Policy** and **Kindness and Anti-Bullying Policy**)
- We work in partnership with parents and carers to promote a shared understanding that child-on-child abuse is never acceptable. We listen to concerns, act promptly and support families throughout the process.
- We empower children to help create a safe, respectful and caring school community, including knowing how to respond as responsible bystanders.
- We regularly review our approach to ensure it reflects the needs of our children and developments in technology and safeguarding practice.
- We consider whether aspects of the school environment contributed to an incident and make improvements to enhance safety and supervision.
- We learn from every incident, reflecting on opportunities for earlier intervention and identifying any wider themes that need to be addressed.
- We apply fair and proportionate consequences that promote accountability and reinforce that abusive behaviour is unacceptable.
- We celebrate diversity and promote respect for all, while making it clear that prejudice-based language and behaviour are never acceptable.
- We provide regular training so that all staff and volunteers can confidently recognise, prevent and respond to child-on-child abuse.
- We make it easy for children to report concerns and ensure they know they will be listened to, believed and supported.
- We create an inclusive environment where children feel safe to share their experiences without fear of judgement or discrimination.
- We recognise that some children with SEND may face additional barriers to reporting concerns and ensure appropriate support is available.
- We regularly teach and discuss healthy relationships, respectful behaviour and the impact of harmful actions through our curriculum and wider school culture.

Appendix 8

Managing allegations and concerns against professionals who work with children

See KCSIE 2026 Part 4: Section 1 (paragraphs 431 – 525)

An allegation is any information which indicated that a member of staff (paid, supply or voluntary) may have:

- Behaved in a way that has or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in such a way that indicates they would pose a risk of harm if they worked regularly or closely with a child; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. In regard to a person's conduct outside school, and need not include a child, for example domestic abuse of a partner.

This applies to any child the member of staff has contact with in their personal or professional life.

All staff are reminded of the school's Whistleblowing Policy, which may be found on the shared drive and the staff safeguarding noticeboard or is available from the Head of Trust / Headteacher.

Safeguarding or child protection allegations about members of staff must be reported immediately to the Headteacher, or in their absence the Deputy Headteacher.

Allegations may be made in a number of ways:

- Direct disclosure by young people
- Indirect disclosure; i.e. through written work or art work
- Complaints to the school from parents/carers
- Complaints to Social Care from parents/carers

- Complaints to Police from parents/carers
- Reports by other colleagues or agencies

Allegations concerning the Headteacher should be referred to the Chair of Governors, allegations concerning the Head of Trust should be referred to the Chair of the Trust Board using the contacts details set out in the key information section of this policy.

These concerns will be discussed with the Local Authority Designated Officer (LADO) immediately. Where the allegation is against a supply/agency staff, the school is still responsible for contacting the LADO and ensuring the allegation is dealt with properly. Contact details for the LADO for Trafford can be found in Appendix 3.

Initial discussions with the LADO will consider the nature of the allegation and the course of action.

The context in which an incident occurs is crucial to understanding the incident and the definition to be ascribed to it.

In order to differentiate between incidents which are of a child protection nature and those which are more properly dealt with as conduct or competency issues or to identify those allegations which are vexatious, the allegation must be considered in light of the following:

Normal function, environment, expectations and standards applied to the practitioner and with regard to the activity and circumstances in which the alleged incident occurred.

Any physical contact with children and young people could be open to misinterpretation. Perceptions and language again can present very different views of the same incident, particularly where there is or has been earlier disagreement or challenge between the child and the member of staff concerned.

There may be up to 3 strands in the consideration of an allegation:

- a police investigation of a possible criminal offence;
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- consideration by the organisation of disciplinary action in respect of the individual.

The fact that a person tenders his or her resignation, or ceases to provide their services, must not prevent an allegation being followed up in accordance with these procedures

Where an allegation has been made, and initial considerations suggest that the incident is likely to have occurred but the behaviour complained of does not reach the threshold for referral to social care and police, the school should investigate the matter internally to determine whether there is need to undertake disciplinary action, or to cease to use the services of the individual, and/or refer the individual's name to the Secretary of State for possible inclusion on the appropriate barring list.

Where a criminal investigation has been undertaken but the police and/or CPS decide not to charge the individual with an offence, or decide to administer a caution, or the person is acquitted by a Court, the school should still investigate the matter and consider whether to apply the school's disciplinary procedures.

KCSIE 2026: "Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference." (paragraph 499)

Procedures:

The school follows the procedures recommended by the Trafford Strategic Safeguarding Partnership when dealing with allegations made against staff and volunteers.

All allegations made against a member of staff and volunteers, including contractors or security staff working on site, will be dealt with quickly and fairly and in a way that provides effective protection for the child while at the same time providing support for the person against whom the allegation is made.

We will take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. We will always ensure that the procedures outlined in https://www.traffordsafeguardingpartnership.org.uk/safeguarding-children-and-young-people/Allegations-Against-Adults-Who-Work-With-Children/allegations-against-adults-who-work-with-children.aspx and Part 4 of *'Keeping Children Safe in Education'*, DfE (2026) are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO). The LADO can be contacted via e-mail anita.hopkins@trafford.gov.uk or by phone 912 5024/TRAFFORD CHILDREN'S FIRST RESPONSE 912 5215

If an allegation is made or information is received about any adult who works in our setting which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Headteacher immediately. This includes concerns relating to agency and supply staff and volunteers. Should an allegation be made against the Head of Trust or Headteacher, this will be reported to the Chair of Governors/Chair of Trust and the LADO. In the event that the Head of Trust / Headteacher/Chair of Governors/Chair of Trust is not contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Headteacher or the Vice Chair of Governors.

The Head of Trust / Headteacher or Chair of Governors will seek advice from the LADO within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Head of Trust / Headteacher or Chair of Governors should contact the LADO directly on 0161 912 5010

The School has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

NSPCC Whistleblowing Advice Line

The NSPCC Whistleblowing Advice Line offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation.

https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/

Tel: 0808 800 5000

Appendix 9

Safer use of the Internet and Digital Technology

KCSIE 2026: "The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images including those generated using AI and online bullying, and

- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/). **(paragraph 163)**

We recognise that in a modern learning environment, use of emerging technology, the internet, multimedia devices and digital imaging facilities are part of everyday requirements. However, a child/young person's safety will remain the priority of the school.

All staff are aware that any items that have capability for use of the Internet or the creation of digital images (including mobile phones) must be used by children/young people under appropriate supervision. If any such item that belongs to a member of staff is brought onto the school site, it is the responsibility of that staff member to ensure that these items contain nothing of an inappropriate nature.

Children/young people are not permitted to directly access items that do not belong to the school.

If there is any suspicion that any multimedia device or computer contains any images or content of an inappropriate nature, the Headteacher or DSL should be informed immediately.

Whilst it is essential that governing bodies and proprietors ensure that appropriate filters and monitoring systems are in place; they should be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

Social Networking Sites

Social Networking sites are part of everyday culture within the cyber environment and all staff will promote safe use of the internet to all children. The school curriculum includes the input of appropriately trained personnel around Internet Safety and safe use of media items. Staff will ensure that any personal use of social networking sites does not in any way impinge upon the school or their professional standards. Any concerns regarding a staff member's conduct should be brought to the immediate attention of the Headteacher or the DSL.

Any attempt by a child/young person to contact staff via such internet sites will immediately be reported to the Headteacher or DSL in order that appropriate advice can be given to the child and their parents/carers regarding professional boundaries and the safety of the child.

Nudes and Semi-Nudes

'Nudes and Semi-Nudes' is one of several 'risk-taking' behaviours associated with the use of digital devices, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be completely eliminated. However, each school takes a pro-active approach in its Computing and Enrichment programmes to help children to understand, assess, manage and avoid the risks associated with 'online activity'.

Our schools recognises their duty of care to its young people who do find themselves involved in such activity as well as its responsibility to report such behaviours where legal or safeguarding boundaries are crossed.

There are several definitions of 'nudes and semi-nudes' but for the purposes of this policy nudes and semi-nudes is simply defined as:

- Images or videos generated by children under the age of 18, or of children under the age of 18 that are of a sexual nature or are indecent.
- These images are shared between young people and/or adults via a mobile phone, handheld device, computer, 'tablet' or website with people they may not even know.

There are many different types of nudes and semi-nudes, and it is likely that no two cases will be the same. It is necessary to carefully consider each case on its own merit.

The Designated Safeguarding Lead (or DDSL in the absence of the DSL) needs to be informed of any 'nudes and semi-nudes' incidents. The range of contributory factors in each case also needs to be considered to determine an appropriate and proportionate response.

The Trust adopts the UK Council for Child Internet Safety guidance 'Nudes and semi-nudes in schools and colleges: Responding to incidents and safeguarding young people' in respect of our response to nudes and semi-nudes. This guidance clearly sets out how to handle incidents, should they occur and what preventative steps can be taken to educate young people.

Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024) - GOV.UK

New UKCIS Guidance: Sharing Nudes and Semi-Nudes - Safer Schools

AI and Emerging Technology Risk
As part of our commitment to safeguarding children in an increasingly digital world, we recognise that emerging technologies, including artificial intelligence (AI), can present new risks to children's safety and wellbeing. These risks may include the creation or sharing of manipulated or AI-generated images, deepfakes, nudification tools, online harassment, cyberbullying, misinformation and other forms of technology-enabled abuse.

We are committed to helping children develop the knowledge, skills and critical thinking needed to navigate these technologies safely and responsibly. Through our online safety curriculum, staff training and safeguarding procedures, we educate pupils about the potential risks associated with emerging technologies and promote safe, respectful and ethical use of digital tools. Any concerns relating to AI-enabled abuse, image-based abuse or other harmful online behaviour will be treated seriously and responded to in line with our safeguarding, child protection and child-on-child abuse procedures.

See **Trust AI Policy**, See **School Online Safety Curriculum**

Mobile Phones

KCSIE 2026: "All schools should be mobile phone-free environments by default; anything other than this should be by exception only.".(paragraph 68)

Our Trust Mobile Phone Policy provides clear guidance on the use of mobile phones. Camera mobile phones are now the norm, and a built-in digital camera enables users to take high resolution pictures. These can be sent instantly to other mobile phone users or email addresses. They can also be posted on the internet or in chat rooms. There is a potential for camera mobile phones to be misused in schools. They can become an instrument of bullying or harassment directed against pupils or/and teachers.

See **Trust Mobile Phone Policy, Trust Social Media Policy, Trust Acceptable Use Policy, Trust Online Safety Policy, Trust Information Security Policy**

See Mobile phones in schools - GOV.UK

Appendix 10

3rd October 2018

For Attention of ALL staff

Disqualification criteria

The criteria for disqualification under the 2006 act and the 2018 regulations include:

- inclusion on the Disclosure and Barring Service (DBS) Children's Barred List
- being found to have committed certain violent and sexual criminal offences against children and adults which are referred to in regulation 4 and Schedules 2 and 3 of the 2018 regulations (note that regulation 4 also refers to offences that are listed in other pieces of legislation)
- certain orders made in relation to the care of children which are referred to in regulation 4 and listed at Schedule 1 of the 2018 regulations
- refusal or cancellation of registration relating to childcare (except if the refusal or cancellation of registration is in respect of registration with a child minder agency or the sole reason for refusal or cancellation is failure to pay a prescribed fee under the 2006 act (regulation 4(1) of the 2018 regulations), or children's homes, or being prohibited from private fostering , as specified in paragraph 17 of Schedule 1 of the 2018 regulations
- living in the same household where another person who is disqualified lives or is employed (disqualification 'by association') as specified in regulation 9 of the 2018 regulations (note that regulation 9 only applies where childcare is provided in domestic settings, defined as 'premises which are used wholly or mainly as a private dwelling' in section 98 of the act, or under a domestic premises registration, including non-domestic premises up to 50% of the time)
- being found to have committed an offence overseas, which would constitute an offence regarding disqualification under the 2018 regulations if it had been committed in any part of the United Kingdom

The above list is a summary of the criteria that lead to disqualification. Further details about the specific orders and offences, which will lead to disqualification, are set out in the 2018 regulations.

I am required to ask all staff and volunteers who have contact with children under the age of 5 to self-declare if any of the criteria above applies to them. It is your responsibility to inform me if any of the above criteria applies to you.

I will assume no response indicates you are NOT disqualified from working with children.

Kylie Spark

Head of Trust

Appendix 11

Trafford Threshold Chart (updated January 2018)

Tier		Description	Assessment / Referral process	
1	Universal and prevention	Children whose needs are met by universal services; for example GP, school, school nurse, health visitor, or community groups.	The Trafford Service Directory hosts a range of information on services that are available in the local community.	Trafford Service Directory
2	Targeted and co-ordinated /Early Help	Some children have specialist input by a single agency such as speech therapy, physiotherapy or housing. If more than one agency is working with a family, a multi-agency approach should be co-ordinated by a lead professional.	Single Agency Referral Form (SARF) to co-ordinate access to a specific service to address an individual need. Early Help Assessment to co-ordinate a multi-agency response to multiple unmet needs for the child/young person.	SARF or Early Help Assessment
3 (Low)	Early Help/ Specialist	As the complexity of a child's needs increase then an Early Help Assessment should be co-ordinated and a multi-agency plan of support developed.	Early Help Assessment to access the appropriate support; co-ordinating a multi-agency response to multiple, unmet needs for the family.	Early Help Assessment
3 (High)	Complex	If the child's issues continue to escalate or interventions are not working and it is felt the child's needs cannot be met without the intervention of social care.	Consideration of consultation with MARAT to determine whether a referral for social work assessment should be made. This is done via the Early Help Assessment or SARF.	Statutory or specialist assessment
4	Acute	This includes children for whom adoption is the plan, those who are in the care system, children subject to Child Protection Plans and those who are in the criminal justice system as well as those with the highest level of complex and additional needs. At this level children's social care will be the lead agency and the threshold is met for statutory involvement of agencies.	Existing referral processes to social care (MARAT) and other specialist and intensive provision such as Family Focus, SEN Statutory Intervention, Healthy Young Minds Tier 3&4.	Statutory or specialist assessment

Appendix 12

What to say to a child and how to respond

1. **Listen carefully to what they're saying**
   Be patient and focus on what you're being told. Try not to express your own views and feelings. If you appear shocked or as if you don't believe them it could make them stop talking and take back what they've said.

2. **Give them the tools to talk**
   If they're struggling to talk to you, show them Childline's letter builder tool. It uses simple prompts to help them share what's happening and how they're feeling.

3. **Let them know they've done the right thing by telling you**
   Reassurance can make a big impact. If they've kept the abuse a secret it can have a big impact knowing they've shared what's happened.

4. **Tell them it's not their fault**
   Abuse is never a child's fault. It's important they hear, and know, this.

5. **Say you'll take them seriously**
   They may have kept the abuse secret because they were scared they wouldn't be believed. Make sure they know they can trust you and you'll listen and support them.

6. **Don't confront the alleged abuser**
   Confronting the alleged abuser could make the situation worse for the child.

7. **Explain what you'll do next**
   For younger children, explain you're going to speak to someone who will able to help. For older children, explain you'll need to report the abuse to someone who can help.

8. **Report what the child has told you as soon as possible**
   Report as soon after you've been told about the abuse so the details are fresh in your mind and action can be taken quickly. It can be helpful to take notes as soon after you've spoken to the child. Try to keep these as accurate as possible.