HASTINGS SCHOOL

Safeguarding and Child Protection Policy

including knowledge base and processes

Hastings School – September 2026

SPAIN

Registered in England & Wales - Cognita Schools Limited No. 02313425
Registered Office: Seebeck House, One Seebeck Place Knowlhill, Milton Keynes, Buckinghamshire, MK5 8FR

COGNITA

THRIVE IN A RAPIDLY EVOLVING WORLD

Document contents

The structure of this document is outlined below. The intention is to allow for swift and easy access to the information you might need using the direct links.

Part 1: Safeguarding in our school

A. Introduction
B. Commitment
C. Principles
D. Scope
E. Definitions and Terminology
F. Key Contacts
G. Roles and Responsibilities
H. Training Requirements
I. Information sharing and Data Protection
J. Policy Review
K. Governance arrangements
L. Legal considerations
M. Related documentation
N. Teaching pupils about safeguarding
O. Online Safety
P. Child's Voice
Q. Safer Recruitment
R. Working in partnership with parents/carers

Part 2: Knowledge Base

A. Categories of abuse: Physical, Emotional, Sexual, and Neglect
B. Domestic Abuse incorporating controlling or coercive behaviour, and Child and Adolescent to Parent Violence and Abuse (CAPVA)
C. Child on Child Abuse (including harassment and violence)
D. Problematic Sexual Behaviour, Harmful Sexual Behaviour, Sexual harassment and Sexual Violence
E. Child Criminal Exploitation (CCE) and Serious Violence
F. Child Sexual Exploitation (CSE) including group CSE
G. Financially Motivated Sexual Extortion (FMSE)
H. Self-Generated Imagery/Videos (also known as sharing nudes/semi-nudes)including AI generated
I. AI Generated Child Sexual Abuse Material
J. Honour Based Abuse
K. Forced Marriage

L. Female Genital Mutilation, Virginity Testing
M. Faith/belief-related Abuse
N. Behavioural indicators in children
O. Behavioural indicators in staff
P. Grooming
Q. Radicalisation
R. Adverse Childhood Experiences
S. Mental Health
T. Children who may have specific vulnerabilities
U. Stages of early intervention and child protection
V. Contextual Safeguarding
W. Signposting to further information

Part 3: Processes

Procedures and guidance that support schools to implement effective and successful safeguarding:

A. Reporting and recording in relation to pupils
B. Reporting and recording in relation to staff (not parents/carers) including:

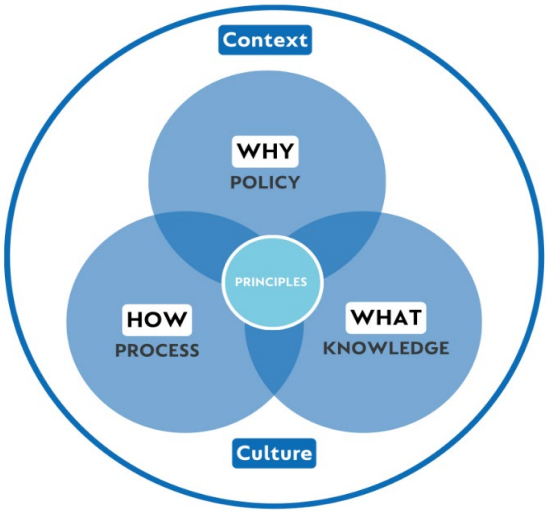
    1. Expectations of staff conduct
    2. Low-Level concerns
    3. Self-Reports
    4. Allegations

C. Whistleblowing
D. Managing situations involving child on child abuse
E. Managing situations involving self-generated intimate imagery/videos including AI
F. Managing situations involving Problematic Sexual Behaviour (PSB) , Harmful Sexual Behaviour (HSB), Sexual Harassment and Sexual Violence
G. Managing situations involving mental health
H. Visiting speakers
I. Lettings for individuals and organisations

Part 1: Safeguarding in our school

A Introduction

Establishing a strong culture of care for our pupils is our number one priority. This policy provides the framework for this to be lived and is divided into three main parts (see visual).



WHY – Policy

Our commitment and guiding principles to safeguarding.

WHAT – Knowledge

The knowledge we need to know to effectively engage with our safeguarding processes.

HOW – Process

The processes required to ensure effective safeguarding in our schools.

Whilst these areas provide the basis for our work, there are two other essential elements to consider: context and culture.

Context

Each school serves a distinctive community. Whilst there are universal principles and processes in safeguarding, an individual school community may also have specific contextual features that impact the safeguarding risks and considerations for pupils. These will in turn influence a school's approach to the implementation of policy.

Culture

School culture is the collection of values, expectations and practices that guide and inform the work of all members of a school community. Language, action, and behaviours tell you about the culture in a school. The safeguarding policy is important, but only when actively lived every day in the culture of the school. Safeguarding is a shared responsibility for every member of the school community, and staff are part of a wider safeguarding system for children. Creating a strong safeguarding culture is essential to providing the most effective environment for pupils to thrive in all aspects of their development.

B Commitment

We are committed to safeguarding and promoting the welfare, physical and mental health, and safety of each child. We will do this by creating and maintaining an open, inclusive, caring, and supportive atmosphere where each child may thrive and develop physically, socially, emotionally, and academically. It is our responsibility to ensure that all pupils have equal rights to be protected from harm and abuse and the right to feel safe.

This includes:

- Proactively teaching pupils about safeguarding
- Ensuring that systems and processes are in place to protect pupils; and
- Acting in the best interests of the pupil

C Principles

Our principles of safeguarding are universal and apply to all Cognita schools. They have been developed by the Cognita Regional Safeguarding Leads and take account of the International Taskforce for Child Protection, the United Nations Rights of the Child, and globally leading practice.

1. Everyone has a responsibility to support the protection of pupils.
2. All staff will maintain an attitude of “it could happen here” and be educated in understanding the types and indicators of abuse, neglect, and exploitation, and the consequent duty of care they hold to notice any potential harm to pupils.
3. All staff will adopt a child-centred approach within a whole family focus, working in partnership with parents/carers as far as possible. Staff will be empowered to act in the best interests of the pupil to protect them from harm and take appropriate actions if any concerns arise. The pupil’s welfare is paramount.
4. All staff will know our pupils well, are in a position to identify concerns early, and offer timely support to those who have experienced, or are at risk of experiencing, an adverse childhood experience so as to prevent concerns from escalating. They must act on any concerns about

a pupil **immediately.** They must not assume that another colleague will take action and share information that might be critical in keeping pupils safe.

5. All pupils will be empowered to be able to voice their opinion and to share their thoughts and beliefs within the safe environment of the school. Pupil's wishes and feelings are sought, heard, and responded to using a variety of systems which are well promoted, and easily understood and easily accessible for pupils to confidentially report any form of abuse or neglect, knowing their concerns will be treated seriously that they can safely express their views and give feedback.
6. All pupils will be educated to be aware about how to manage risk, identify harmful behaviours, both online and offline, and seek help when needed.
7. All staff who work with or for the school will have been safely recruited.
8. Effective safeguarding is anti-discriminatory and anti-racist. Staff should understand and be sensitive to factors, including economic and social circumstances, ethnicity and disability, which can impact pupils and families' lives.

D Scope

This policy applies to all pupils in the school, including those in the Early Years.

In accordance with the terms set in the LOPIVI Art. 51, this Safeguarding Policy applies to all pupils and young people in Spanish territory, regardless of their nationality and administrative residence status, and to all children of Spanish nationality abroad.

It applies to all staff in the school, including in the Early Years: teaching, non-teaching, trainee teachers, pastoral, support, peripatetic, contract staff and ancillary staff, agency/supply staff, volunteers, non-school based Cognita staff and any other staff working at the school. All references in this document to "staff" or "members of staff" should be interpreted as relating to the aforementioned, unless otherwise stated.

This policy applies to all pupils and staff when on the school site, and when the pupils are being educated off-site and/or undertaking an educational visit. It also applies to pupils who are on an exchange and being hosted by the school.

This policy also applies to all third parties who run activities in school on behalf of the school.

E Definitions and Terminology

Definition of safeguarding

Safeguarding and promoting the welfare of pupils is defined for the purposes of this policy as:

- providing help and support to meet the needs of pupils as soon as problems emerge

- protecting pupils from maltreatment (abuse, neglect and/or exploitation); whether that is within/outside the home or online
- preventing impairment of pupil's physical and/or mental health or development
- ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all pupils to have the best outcomes

Definition of child protection

Child protection is *part* of the safeguarding process and is

defined for the purpose of this policy as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including in foster care and residential care, as well as online.

Definition of a child

A child is an individual who is under 18 years old. The word child (ren) is used throughout this policy to mean all children, whilst the word pupils is used when referring to children who attend out school, even if they are over the age 18.

Terminology

'RSL' refers to the Cognita Regional Safeguarding Lead (Europe and USA)

'CPC' refers to the school's named Child Protection Coordinator

'DCPC' refers to the school's named Deputy Child Protection Coordinator

'DE' refers to the Cognita Director of Education (Europe and USA)

'MD' refers to the Cognita Southern Europe Managing Director

'HoHR' refers to the Cognita Head of Human Resources

'CSO' refers to the Cognita Chief Schools Officer West

'ECMS' refers to an Electronic Case Management System used for safeguarding recording

'Cause for Concern' form refers either the document from the internal Toolkit/ECMS input

LOPIVI' refers to the Spanish national law: *Ley Orgánica 8/2021 4 de junio de Protección Integral a la Infancia y la Adolescencia frente a la Violencia*

'AEPD' is the *Agencia Española de Protección de Datos*, the Spanish Data Protection Regulator.

F Key Contacts

School contacts	
Child Protection Coordinator (CPC)	Isabel Solis
Deputy Child Protection Coordinators (DCPCs)	Emma Duffy, Linda Carruthers, Cristina Gasca, Fiona Chapman, Anne McConnell, Marina Martinez, Bryan Healy, Robbie Alexander, David McClement, Eva Gallego, Andrew McEachen, Rachel Longworth, Sally Isaac, Bianca Couto
Any other staff trained to CPC level	Gary Cook, Kerry Hazel, Craig Hillis Ian Piper
Designated Practitioner with responsibility for safeguarding in early years (where appropriate)	Emma Duffy
Deputy Designated Practitioner with responsibility for safeguarding in early years (where appropriate)	Isabel Solis
Inclusivity Champion	Cristina Gasca
Senior Attendance Champion	David McClement
Designated Lead for Pupils not Cared for by their parents	Isabel Solis
Mental Health and Emotional Wellbeing Lead	Isabell Solis
Head of School/Headteacher	Ian Piper
Executive Principal/Headteacher	Ian Piper

Cognita contacts	
Regional Safeguarding Lead (Europe and USA)	Alison Barnett alison.barnett@cognita.com
Regional Director of Education (Europe and USA)	Sarah Reynolds sarah.reynolds@cognita.com
Managing Director (Governance oversight, including Safeguarding)	Alvaro de Miguel alvaro.demiguel@cognita.com
Chief Schools Officer (West)	Germa Rigau Rodriguez germa.rigau@cognita.com

Cognita (proprietor) board member for safeguarding and Group Chief Education Officer	Dr Simon Camby simon.camby@cognita.com
Group Legal Counsel	Jayne Pinchbeck jayne.pinchbeck@cognita.com
Whistleblowing Officer	Jamie Delaney whistleblowingofficer@cognita.com

Note: The Cognita Regional Safeguarding Lead (RSL) (Europe and USA) is a role which supports the development of effective safeguarding practice within the Cognita family of schools and is not intended to replace, in any way, the statutory referral and reporting requirements.

Local Authority Contacts	
Our school follows the safeguarding protocols and procedures of the LOPIVI and of our local social services.	Comunidad de Madrid - protocols and procedures
The local authority Social Services referral team	**Dirección General de la Familia y el Menor** Subdirección General de Infancia y Adolescencia Área de Infancia y Adolescencia C/ Manuel de Falla, 7 CP: 28036 Madrid Teléfonos: 91 420 85 68 / 91 580 34 64 Out of hours number: 913223555
Contact for Radicalisation concerns	Following PRODERAI-CE procedures: *Inspección Educativa and Mossos de Proximitat*
Police	
Emergency service	112
Local police non-emergency	091 **Comisaría de Distrito Madrid Chamartín** Avda. PÍo XII, 48 28016 - Madrid (Madrid) Tel.: 913227910 **Comisaría de Distrito Madrid Hortaleza - Barajas** C/ Javier del Quinto, s/n 28043 - Madrid (Madrid) Tel.: 913221188

Location of safeguarding and child protection documents in school	
List the documents – from statutory/ external	Principal´s Office Safeguarding section of Sharepoint site https://cognitaschoolsuk.sharepoint.com/sites/hastingspolicies_safeguarding/Shared%20Documents/Forms/AllItems.aspx

agencies and school documents	

National Contacts	
Teléfono de la Esperanza	Tel: +34 91 459 00 55 Tel: 717 003 717
ANAR Foundation	Tel: +34 900 20 20 10 Tel: 116111 https://www.anar.org/
Gender Violence phone	Tel: 016
Bullying helpline	Tel: + 34 900 018 018
Catalonian Sindic dels Infants I Adolescents (minor ombudsman)	Tel: +34 900 124 124 Email: infancia@sindic.cat

UK contacts	
NSPCC 24/7 Helpline	Tel: 0808 800 5000 Email: help@nspcc.org.uk
NSPCC Text line	88858
NSPCC Child Line	Tel: 0800 1111
NSPCC FGM helpline	Tel: 0800 028 3550 Email: fgmhelp@nspcc.org.uk
NSPCC Whistleblowing helpline	Tel: 0800 028 0285 (8am – 8pm) Email: help@nspcc.org.uk
DfE Prevent helpline for schools & parents	Tel: 020 7340 7264 (non-emergency) Email: counter.extremism@education.gsi.gov.uk
The Lucy Faithfull Foundation (LFF)	Tel: 0800 1000 900 Email: help@stopitnow.org.uk www.parentsprotect.co.uk

National Bullying Helpline	Tel: 0845 22 55 787
UK Safer Internet Centre helpline for School Staff	Tel: 0844 381 4772 Email: helpline@saferinternet.org.uk
Internet Watch Foundation hotline for reporting criminal content	www.iwf.org.uk
Educate Against Hate	http://educateagainsthate.com

G Roles and Responsibilities

This section will outline the following:

A. Safeguarding is everyone's responsibility
B. Specific safeguarding roles in our school
C. The Proprietor's role and responsibilities

A Safeguarding is everyone's responsibility

In our school, safeguarding is everyone's responsibility. No single person can have a full picture of a pupil's needs and circumstances. If pupils and their families are to receive the right help at the right time, everyone who encounters them has a role to play in identifying concerns, sharing information, and taking prompt action.

To fulfil this responsibility effectively, all staff should make sure their approach is child-centred within a whole family focus. This means that they should consider, always, what is in the best interests of the child, whilst considering the needs of all parties.

All staff have the following responsibility to:

- Read and understand this policy including all knowledge base documents
- Contribute to providing a safe environment in which all pupils can learn and flourish
- Be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, and/or neglected, and/or they may not recognise their experiences as harmful
- Know what to do if a child tells them that they are being abused, neglected, and/or exploited and/or if they are experiencing
- Problematic Sexual Behaviour, Harmful Sexual Behaviour, Sexual Harassment, and/or Sexual Violence
-
- Know what to do if they are concerned about the behaviour or conduct of a member of staff in the school
- Manage the requirement to maintain an appropriate level of confidentiality
- Know about Online Safety (including the filtering and monitoring systems that are in use)
- Refer any safeguarding concern about pupils to the CPC or the Deputy CPC
- Refer any safeguarding concern about staff to the Headteacher, or in their absence the Regional Safeguarding Lead/Head of HR/Managing Director
- Refer any safeguarding concern about the Headteacher to the Head of HR/Regional Safeguarding Lead/ Managing Director
- Be aware of the Early Intervention process and their role in it; and identify pupils who may benefit from Early Intervention

- Be aware of the process for making a referral to Social Services and understand the role they might be expected to play
- Be aware of the process of making a referral to the Police and understand the role they may be expected to play in any criminal investigation
- Be aware of the process of making a referral to Preventing Radicalisation services and understand the role they may be expected to play in any enquiries

B. Specific safeguarding roles in the school

Child Protection Coordinator

The Child Protection Coordinator (CPC) is the senior member of staff responsible for leading safeguarding in the school. The CPC must be a member of the school leadership team (SLT), unless approved by the RSL, and have the skills, experience, status and authority required for this role, the CPC takes the lead responsibility for safeguarding and child protection in the school (including online safety within which there is filtering and monitoring) and their role description explicitly reflects this.

Deputy Child Protection Coordinator

The school can appoint any number of Deputy CPCs. Their role is to support the CPC in their safeguarding role. Whilst the *activities* of the CPC can be delegated to DCPCs, the ultimate lead responsibility for child protection must remain with the CPC, and this lead responsibility must not be delegated. The Deputy CPCs are trained to the same level as the CPC and the duties of the Deputy CPCs are reflected explicitly in their role descriptions.

<u>Support for the CPC</u>

The CPC role carries a significant level of responsibility and they must be given the time, funding, training, resources, and support needed to carry out their role. They are required to provide advice and support to other staff on child welfare and child protection matters, to take part in any inter-agency meetings and/or to support other staff to do so, and to contribute to the assessment of pupils.

There are 4 key elements to the CPC role:

1. Manage referrals to external agencies
2. Work with others in other agencies
3. Training, knowledge and skills
4. Raise awareness of safeguarding within the school staff group

1 Manage referrals

The CPC is expected to:

- know and understand the threshold for which services can be obtained in their local authority
- refer cases of suspected abuse to Social Services as required
- support staff who make referrals to Social Services
- refer cases to the Police where there is a radicalisation concern as required, and/or support staff who make referrals
- refer cases where a crime may have been committed to the Police as required
- refer pupils to external mental health agencies/signpost parents to organisations/professionals when there are concerns about a child's emotional wellbeing and/or mental health, in collaboration with the school Wellbeing/Mental Health Lead (s)
- follow up and escalate referrals as needed if not satisfied with the agency response and make re-referrals if the child's situation does not improve despite intervention/lack of parental engagement

2 Work with others

The CPC is expected to:

- act as a point of contact with the relevant local authorities
- liaise with the Headteacher to inform them of safeguarding issues, especially ongoing enquiries involving Social Services and Police investigations
- as required, liaise with the "case manager" (in relation to allegations against staff) and the authorities for child protection concerns in cases which concern a staff member (see below Part C- Allegations)
- liaise with staff (especially pastoral support staff, Wellbeing/Mental Health Lead (s), school nurses, IT technicians, and Learning Support Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- act as a source of support, advice and expertise for all staff
- promote supportive engagement with parents and/or carers in safeguarding and the welfare of pupils, including where families may be facing challenging circumstances

3 Training

Please also see Section H for training requirements.

The CPC (and any deputies) must undergo training to provide them with the knowledge and skills required to carry out their role, including inter-agency working.

This training must be updated **at least every three years**.

This training can be that provided by Cognita or an alternative online version approved by the RSL and included on the country training matrix.

The CPC must undertake Online Safety training on an annual and ongoing basis. This will likely be the same training offered to all child-facing staff created centrally but also comprise any additional training that they identify.

The CPC must undertake Safer Recruitment training every 2 years (see Safer Recruitment Policy).

In addition to the formal training set out above, the CPCs knowledge and skills should be refreshed via informal updates (this might be via e-bulletins, meeting other CPCs off/online, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early intervention, including local criteria for relevant Social Services referral arrangements and thresholds documents
- have a working knowledge of how local authorities conduct a child protection enquiries/meetings and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands this policy, especially new, part-time staff, trainee teachers, and/or agency staff
- are alert to the specific needs of pupils who are more vulnerable (see below)
- learn how to maintain high aspirations for vulnerable pupils, promoting their educational outcomes by knowing the welfare, safeguarding and child protection issues experienced by them and the potential impact on their attendance, engagement and achievement
- understand how to support teaching staff to feel confident providing additional academic support/reasonable adjustments for vulnerable pupils who need or have needed a Social Worker, recognising the lasting impact on educational outcomes, even when agencies have ceased involvement
- understand relevant data protection legislation and regulations
- understand the importance of information sharing, both within the school, and with other agencies, organisations, and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school, with regards to the preventing radicalisation and are able to provide advice and support to staff on protecting pupils from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep pupils safe whilst they are online at school, including knowledge of the school's filtering and monitoring systems and processes
- can recognise the additional risks that pupils with SEN and disabilities (SEND) face online, for example, but not limited to, from online bullying, grooming, exploitation and radicalisation and are confident they have the capability to support pupils with SEND to stay safe online
- can recognise the additional risks that pupils identifying at LGBTQ+ (or perceived to be by others) and/or are questioning their gender (or perceived to be by others) face online, for

example, but not limited to, from online bullying, grooming, exploitation and radicalisation and are confident they have the capability to support these pupils to stay safe online
- have oversight of attendance, including those pupils who are absent from education and/or potentially missing education.
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage and promote a culture of listening to pupils, having an understanding their views and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

4 Raise awareness

The CPC should:

- ensure that the school's Safeguarding and Child Protection policy is known, understood, and used appropriately by staff
- ensure the school's Safeguarding and Child Protection Policy is reviewed annually (as a minimum) after the central review, the procedures and implementation are updated and reviewed regularly, and work with the proprietor/RSL regarding this
- ensure the Safeguarding and Child Protection Policy is available publicly and parents/carers are aware of the fact that referrals to Social Services or the Police about suspected abuse or neglect may be made and the role of the school in this
- ensure that online safety training is provided as part of regular staff updates, including updating them around the school's filtering and monitoring systems and processes
- link with the relevant local authorities to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- help promote and monitor educational outcomes of vulnerable pupils by sharing the information about the welfare, safeguarding and child protection issues that these pupils, including pupils with a Social Worker, are experiencing, or have experienced, with teachers and school leadership staff.
- ensure that the school, and their staff, know who vulnerable pupils are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that pupils in this group might face and the additional academic support and adjustments that they could make to best support these pupils.

Availability

During term time the CPC (or a deputy) will always be available during school hours for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the CPC (or deputy) will normally be available in person, the Headteacher will define what "available" means and whether in exceptional circumstances availability via work phone and/or Microsoft Teams. It is the responsibility

of the Headteacher and CPC to arrange adequate and appropriate cover arrangements for any out of hours/out-of-term activities.

To ensure continuity of safeguarding responsibilities, schools must have robust cover arrangements in place for periods when the CPC is unavailable due to illness, leave or other circumstances.

C The Proprietor's role and responsibilities

Cognita is the proprietor of the school.

As proprietor, Cognita will comply with all duties under legislation and will always take into account statutory guidance, ensuring that all policies, procedures and training are effective and comply with the law at the time.

It is the responsibility of the proprietor to:

- Ensure that all staff having contact with pupils read Part One of Keeping Children Safe in Education plus Annex A
- Ensure that all staff working in the school but not necessarily having direct contact with pupils read Part One of KCSIE
- Ensure that all staff follow the requirements of this Safeguarding and Child Protection Policy
- Ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities, as set out in Part One of KCSIE
- Designate a senior board member to take leadership responsibility for safeguarding arrangements
- Ensure that all safeguarding arrangements take into account and follow the procedures and practice of the relevant local authorities as part of the inter-agency procedures
- Ensure that each school works in line with local inter-agency procedures
- Ensure that appropriate policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote pupils's welfare
- Ensure that the Safeguarding and Child Protection Policy is updated annually and made available via the school website
- Ensure the school has a Staff Code of Conduct, Behaviour, Safer Recruitment and IT Policy
- Ensure that all responsibilities are followed regarding pupils absent from education whilst adhering always to local /national guidance
- Ensure that all schools follow the Preventing Radicalisation Policy, including the requirement to undertake an annual risk assessment
- Instruct schools to hold more than one emergency contact number for each pupil (and advise that these are reviewed regularly by schools)

- Ensure that schools hold names addresses, and telephone contacts for all those who have Parental Responsibility for a pupil on roll
- Ensure that schools report to their relevant local authorities the removal of a pupil from the school roll in line with statutory and relevant local authorities guidance
- Ensure that all schools monitor the attendance of all pupils, paying attention to those that have unexplained, persistent and/or prolonged absence; go missing from education
- Ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction, following the internal Cognita Training Matrix
- Recognise the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis
- Ensure that appropriate filters and monitoring systems are in place to keep pupils safe online and that the principles of the UK DfE filtering and monitoring standards are met (adhering always to local/national guidance); and consider the number of and age range of their pupils, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks. The effectiveness of these filtering and monitoring systems will be reviewed annually and a record made.
- Ensure that they have the appropriate level of cyber security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures annually o keep up with evolving cyber-crime technologies and record these checks.
- Ensure that pupils are taught about safeguarding, including online safety.

The proprietor ensures that an annual review of safeguarding arrangements is conducted. This includes a written report which is presented to the Cognita Board.

H Training Requirements

Training enables staff to fulfil their duty to safeguard pupils. All staff must be aware of the systems within the school which support safeguarding.

All training requirements are according to the most recent Cognita Training Matrix (internal document).

Mandatory training

Induction

Prior to any contact with pupils, all new staff (including those with governance oversight and trainee teachers) must be given a mandatory induction, which includes familiarisation with child protection responsibilities and the procedures/systems to be followed if anyone has any concerns about a child's safety or welfare.

As part of their induction, **all** new school employed staff, including those with governance oversight and trainee teachers, must be provided with and read and/or discussed:

- KCSIE – at least Part One (those directly working with pupils) plus Annex A
- KCSIE – Part One (those who do not work directly with pupils)
- Online Safety (which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring)
- This Safeguarding and Child Protection Policy
- Code of Conduct (including staff/pupil relationships and communications)
- IT Policy
- Group AI Policy
- Social Media Policy
- Children Absent from Education, Children Missing Education and Attendance Policy
- Anti-Bullying Policy
- Behaviour Policy
- Preventing Extremism and Radicalisation Policy
- Use of Reasonable Force, Restrictive Intervention and Restraint Policy (incorporating searching, screening and confiscation)

New staff must be informed of the names and roles of the CPC, DCPCs, and the RSL. They should also be informed of the names of their school Managing Director and Head of HR, Director of Education and Chief Schools Officer.

All new staff including trainee teachers, any agency/supply staff must be made aware that they are not to ever use their personal mobile phone/other personal devices when on the school site where pupils are present, and that they are required to wear the relevant coloured lanyard for staff at all times when on the school site.

Annual Safeguarding Refresher

All staff employed in school must receive face to face annual safeguarding and child protection training from the CPC via the Safeguarding Refresher presentation (created centrally by the RSL), usually at the commencement of the academic year, in addition to any other presentation/information that the CPC has prepared for the school. This is also made available to those in governance roles.

Basic Safeguarding Pupils training

All staff employed in school must complete their online basic Safeguarding Pupils awareness training when they newly start work in the school as part of their induction. This must be updated every three years or less.

NB: CPCs, DCPCs, and Headteachers are not required to undertake the above Basic level training as they complete CPC/Advanced level training respectively (see below).

Agency/Supply/Peripatetic teaching staff must show evidence of Basic Safeguarding training undertaken within 3 years, prior to attending the school for the first time, and must receive a Safeguarding Induction prior to first contact with pupils.

CPCs and DCPCs

(see above section G)

CPCs and DCPC must undertake Advanced level training a minimum of every 3 years. This will ideally be via their relevant local authorities but if this is not available, an online equivalent approved by the RSL or the Cognita Advanced level training created by the RSL (either in person/online videos).

In addition to the formal training set out above, the CPCs knowledge and skills should be refreshed via informal updates (this might be via e-bulletins, meeting other CPCs off/online, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

CSO, MD, DE, Executive Headteacher/Principals, Headteacher/Principals, Principals, and Heads of School

Those in the above roles must complete Advanced Safeguarding training similar to the level of the CPCs every 3 years (this is currently created and delivered by the RSL in person/online).

They must also complete anti radicalisation training (see Preventing Radicalisation Policy), online FGM training every 5 years, annual Online Safety training, and annual Cyber Security training.

Suicide Awareness and Prevention

Those in safeguarding roles must undertake the above training as per the internal Training Matrix every 3 years. Any other staff who wish to undertake this training should contact the RSL to gain access.

Harmful Sexual Behaviours

Those in safeguarding roles must undertake the above training as per the Training Matrix every 3 years. Any other staff who wish to undertake this training may do so with their Headteacher/Principal's agreement.

Safer Recruitment

The CSO, MD , DE, Executive Headteachers, Headteachers, Principals, Heads of School, CPCs and any other staff member directly involved in recruitment, must undertake training every 2 years (see Safer Recruitment Policy).

Preventing Radicalisation

All school employed staff must complete online Preventing Radicalisation training every 3 years. This has been created in video /handout format by the RSL.

Female Genital Mutilation

All school employed staff who have contact with pupils must complete online FGM training every 5 years. This has been created in video /handout format by the RSL.

Online Safety

All staff who have direct contact with pupils must complete the Online Safety training. This training is centrally created by the RSL and self-served by the CPC/DCPC in school.

Cyber security training

All staff in the school must complete annual cyber security training, as must those in governance roles. This will be as per the internal Training Matrix, but additional training can be found below.

Non-Mandatory training

Updates and CPD

All staff will also receive 'drip drip' bitesize safeguarding and child protection updates/training, including online safety training, regularly *throughout the year*. This is created and cascaded by the RSL, CPC, DCPC and/or external specialist. This will ensure that all staff have the relevant skills and knowledge to safeguard pupils effectively. Topics covered may include information related to knowledge base documents. Format and content of any resources/presentations/training sessions can be decided by the school safeguarding team.

Many additional non-mandatory CPD training sessions have been created by the RSL ready for CPCs to self-serve in school as required**.**

Drug and Alcohol Awareness (need-led assessment).

This training is created and/or arranged by the RSL It should be updated every 3 years.

Looked After Pupils (including Previously Looked After).

The Designated Teacher for Looked After Pupils for the school will undertake training every 3 years; this is currently centrally arranged through TES by the RSL.

Mental Health Awareness (Pupils) (need-led assessment).

This training is created and/or arranged by the RSL. It should be updated every 3 years. Those in mental health or wellbeing roles within the school should have additional training- advised by the RSL on request.

Third-party contractors

It is good practice for those employed as third-party contractors who work regularly in school with the opportunity for contact with pupils to have Basic Safeguarding training, at a level appropriate to their role.

I Information Sharing and Data Protection

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.

Information sharing is vital in identifying and tackling all forms of abuse, neglect, and/or exploitation. No single person can have a full picture of a child's needs and circumstances, so effective sharing of information between schools, local organisations and agencies is essential for early identification of need, assessment, and service provision to keep children safe. Staff must not assume that someone else will pass on information that they think may be critical to keep a child safe.

The school should also be aware of its obligations under the AEPD which place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

J Policy Review

This policy is updated annually by the school, after first being centrally reviewed by the RSL. Those in governance roles have oversight and consult with the RSL.

Updates to the policy draw on feedback from safeguarding staff in schools across the region and are also informed by any shared learning from the region/other regions. Changes will also reflect any new government guidance. regulations or legislation. The policy is then shared with all staff through the annual safeguarding declaration process, with training provided throughout the year to support and sustain learning and awareness.

K Governance Arrangements

Governance is undertaken on behalf of the Cognita Board (Cognita Holdings Limited). Group-wide arrangements are in place and the Group Chief Education Officer holds responsibility for these arrangements. The arrangements outline clear lines of accountability and responsibility for all aspects of safeguarding which are executed and reported in the following four ways:

<u>School</u>

Reviews in individual schools by an Independent Safeguarding Reviewer (annual)

Region

Safeguarding data reporting from each school to the regional team (termly)

Regional Safeguarding Assurance Board Meetings (termly)

Group

Regional Annual Safeguarding Report and Annual Safeguarding Governance Meeting

Those with oversight over governance should be aware of their obligations under the local multi-agency safeguarding arrangements for the schools they support. They should also be aware of the obligations under the AEPD which place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Toilet facilities

Schools must not allow pupils into toilets designated for the opposite biological sex. There must be no exceptions. This includes where schools are responding to a request to support any degree of social transition for pupils who are questioning their gender (see below).

Schools must provide separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time). This is required by the Education (Independent School Standards) Regulations 2014 which apply to independent schools and reflects schools' safeguarding obligations.

If a pupil does not want to use the toilet designated for their biological sex, schools should consider whether they can provide an alternative toilet facility, for example self-contained individual toilets, without compromising the provision of single-sex facilities. These alternative arrangements should not compromise the safety, comfort, privacy or dignity of the pupil, or of other pupils.

Where a school provides mixed-sex toilets in addition to single-sex toilets, schools should assess safeguarding risks and plan accordingly, for example, mixed-sex toilets should open directly onto public areas (e.g. a corridor).

Changing Rooms and Showers

Schools must not allow a pupil, aged 11 years or older at the start of the school year, to undress in front of a pupil of the opposite biological sex, to comply with their safeguarding duties. There must be no exceptions. When responding to a request to support any degree of social transition this must not include allowing access to changing rooms designated for the opposite sex.

If a pupil does not want to use the changing rooms and showers designated for their biological sex, schools should consider whether they can provide an alternative changing or washing facility, but this must not compromise the provision of single-sex facilities. This could be a fully enclosed room

– for use by one pupil at a time that can be secured from the inside – or by allowing access to facilities at an alternative time.

It is important that schools keep a clear written record of these situations, ensure they are communicated appropriately, and review them regularly.

Residential accommodation

Schools must not allow a pupil to share overnight accommodation with a pupil of the opposite biological sex. There must be no exceptions. Responding to a request to support any degree of social transition must not include allowing access to residential accommodation designed for the opposite sex.

In allocating sleeping arrangements such as dormitories, tents or shared rooms for school trips, schools must have regard to their safeguarding obligations, and other relevant regulations and standards, including those related to residential accommodation.

However, if a pupil does not want to share a room with another pupil of the same biological sex, alternative arrangements must be sought where possible. Alternative arrangements should not compromise the safety, comfort, privacy or dignity of any pupil. They might include, for instance, finding a suitable separate room for the pupil.

Where a pupil's concern reflects a request for support with social transition, the school should consider the section within KCSIE on 'considering requests for support for social transition' before making any decisions.

L Legal considerations

Our safeguarding and child protection policies, processes and knowledge base are built upon and support the 1989 international legal framework - the United Nations Convention on the Rights of the Child.

Specific legal context (not limited to)

In Spain, our legal framework is the *Ley Orgánica 8/2021 de junio de Protección Integral a la Infancia y a la Adolescencia frente a la Violencia* (also known as the LOPIVI).

Also the *Ley 4/2023, de 28 de febrero, para la igualdad real y efectiva de las personas trans y para la garantía de los derechos de las personas LGTBI* which establishes a comprehensive framework to promote respect, inclusion and protection for LGTBI people.

M Related documentation

This policy should also be read in relation to the most recent version of the following UK documents which underpin this policy and best practice across the region:

National government guidance documents (UK):

- The Education (Independent School Standards) Regulations (2014)
- School Attendance (Pupil Registration) (England) Regulations (2024)
- Independent School Standards Guidance (2026)
- Schools (Recording and Reporting of Seclusion and Restraint) (England) Regulations 2025
- Keeping Children Safe in Education (KCSIE) (2025)
- Working Together to Safeguard Children (2026)
- Working Together to Improve Attendance (2024)
- Prevent Duty Guidance: for England and Wales (2023)
- Safeguarding Learners vulnerable to radicalisation (2023)
- Teachers Standards (2021)
- Behaviour in schools; advice for headteachers and school staff (2024)
- Mobile phones in schools (2026)
- Use of Reasonable Force, Restrictive Interventions and Restraint (2025) Restrictive Interventions, including the use of reasonable force in schools (2026)
- Schools (Recording and Reporting of Seclusion and Restraint) (No 2) (England) Regulations (2025)
- Gender separation in mixed schools (2018)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (20256)
- Preventing and Tackling Bullying: advice for Headteachers, staff and governing bodies (2017)

Any references to guidance made within this document are in relation to the versions listed above. The school will always refer to the above guidance as the benchmark for all safeguarding practice and decision making, whilst adhering to local authority procedures.

Internal Cognita school documents:

- Behaviour Policy
- Anti-Bullying Policy
- Drug and Alcohol Policy
- IT Policy
- Group AI Policy

- Suspension, Exclusion and Required Removal in Other Circumstances Policy
- Early Years – Use of Mobile Phones, and Devices Policy
- Preventing Extremism and Radicalisation Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Use of Reasonable Force, Restrictive Interventions, and/or Restraint, incorporating Screening, Searching, and Confiscation Policy
- Social Media Policy
- Equality, Diversity, and Inclusion Policy
- Children Absent in Education, Children Missing Education, and Attendance Policy
- Pupil Supervision, Lost, and Missing Policy
- Group Safeguarding Governance and Oversight Policy

N Teaching children about safeguarding

The school is committed to proactively teaching pupils about safeguarding, including online safety, as part of our approach to offering a broad, balanced and inclusive curriculum.

The safeguarding curriculum is taught across the school in the following way:

- Safeguarding is taught explicitly throughout all Key Stages within the PSHE curricular.
- Relationships education is taught in all primary schools through the PSHE programme.
- Relationships and sex education (RSE) is taught in all senior schools through the PSHE programme.

O Online Safety

Introduction

Technology often provides the platform that may facilitate harm. All staff should be aware of the unique risks to pupils associated with online safety, and that technology is a significant component in many safeguarding and wellbeing issues, for example, the part that online use can play in grooming children and facilitating and/or causing harm. Staff should also be aware that there may be an overlap between online and off line risk of harm.

It is essential that pupils are safeguarded from potentially harmful and inappropriate online material. As such, online safety is a running and interrelated theme within our whole school approach to safeguarding. This empowers the school to protect and educate pupils (and staff) in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Whilst some tasks are able to be delegated to other members of the safeguarding team or other interested and knowledgeable staff, CPCs are responsible for overseeing online safety in schools (including understanding the filtering and monitoring systems and processes in place). They must raise awareness for staff, accordingly, including but not limited to, filtering and monitoring systems, cyber-bullying, child sexual/criminal exploitation, radicalisation, sexually coerced exploitation, and sexual predation, including online grooming.

Areas of risk

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

1 **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.

2 **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 staff posing as pupils or young staff with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

3 **Conduct:**

online behaviour that increases the likelihood of (or causes) harm for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos, including those generated using AI e.g. deepfakes nudes and semi-nudes and/or, pornography, sharing other explicit images, pornography, and online bullying

4 **Commercial:**

risks such as online gambling, inappropriate advertising, phishing, and or financial scams (including sexually coerced exploitation). If pupils or staff are at risk, please report it to phishing@cognita.com

Annual Risk assessment

Technology, and risks and harms related to it evolve and changes rapidly.

The school must carry out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their pupils face (using the 360 safe website OR the LGfL online safety audit).

Filtering and Monitoring

Whilst considering their responsibility to safeguard and promote the welfare of pupils and provide them with a safe environment in which to learn (whatever their age and stage of development), those with governance oversight centrally and at the school will be doing all that they reasonably can to limit pupils' exposure to the above risks from the school's IT system.

As part of this process, the school has appropriate filters and monitoring systems in place , and systems connected to cyber security; these apply to pupils and staff accounts.

These are reviewed centrally by the IT and cyber security departments who are responsible for ensuring schools have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners.

These IT central teams must review the effectiveness of these procedures annually (i.e. a minimum of once every academic year) to keep up with evolving terminology and cyber-crime technologies. Checks are made on all internet connected devices in all relevant locations - a central record is kept of these checks and annual cyber security risk assessment is completed.

In addition to the centrally run checks, reviews, and risk assessments outlined above, the school undertakes internal checks on any alerts that are raised for individual pupils in terms of their online use. Routine checks are made on a weekly basis for all vulnerable pupils plus a selection of random checks are also undertaken.

Should a safeguarding concern be raised in connection with a pupil's online use, the parents/carers will be informed unless to do so would heighten risk to the pupil/other. The concern will be recorded on our main safeguarding system linked to the pupil. Should a safeguarding concern be raised in connection with a staff member's online use, this will be managed internally according to our Low-Level Concerns/Allegations process, in collaboration with the RSL and colleagues in the HR department.

For a full and more detailed description of the school's filtering and monitoring systems, please see our IT Policy. All staff must be familiar with this policy.

Those working centrally for Cognita have reviewed and actioned the guidance within the following:

- Cyber security standards for schools which were developed to help schools improve their resilience against cyber-attacks.

- ‘Plan technology for your school - GOV.UK to self- assess against the filtering and monitoring standards and will make any needed changes, as and when required.
- The appropriateness of any filtering and monitoring systems will also be informed in part, by the risk assessment required in the Preventing Radicalisation and Extremism Policy).
- Generative AI: product safety expectations which supports schools to use generative artificial intelligence safely and explains how filtering and monitoring requirements apply to the use of generative AI in education. For a full and detailed description of our use of AI, please see the AI Policy.

Whilst it is essential that schools 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 pupils can be taught with regard to online teaching and safeguarding. The school will 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. All staff should understand their role in preventing, identifying and responding to harm caused by its use.

Many pupils have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some pupils, whilst at school, may potentially sexually harass their peers via their personal mobile and smart technology, share indecent images, including self/AI generated imagery: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. Schools will always work with parents/carers to support them to address their child’s online activity as needed.

Pupil Mobile Phones

Please see our Behaviour Policy for more information about pupil mobile phones.

At Hastings School, students in Early Years, Primary and LST are not permitted to bring mobile phones into school unless an exceptional circumstance has been agreed with the Head of Primary. In this case, phones will be handed in to the building secretaries. The same applies in LST except contact regarding the mobile phone needs to be with Head of Year and DH Pastoral. Breach of this will result in phones being confiscated for a set period of time in LST.

Students in Key Stage 5 are permitted to use mobile phones at break time or when given explicit permission by a teacher in the lesson (eg Art or Photography). They are not to be used on the premises at any other time and should not be used moving around the building.

Staff Personal Devices

All staff are prohibited from having/using any personal device capable of capturing or sharing imagery/videos and/or data **in the presence/close vicinity of pupils whether on/off site**: this includes mobile phones, tablets, any Smart devices (including, but not limited to; phones, watches, glasses, and rings/jewellery), hearables and wearables (small electronic devices designed to be worn on the body, often close to the skin, to monitor and relay information about the wearer or their environment in real time). Wearables also pose risks (other than those related to safeguarding as

outlined above) in terms of potential data breaches including 'hacking', unauthorized access, and privacy violations such as surveillance and stalking.

Currently health-related wearables may pot entially be worn/used*, as long as the functionality regarding imagery/videos is disabled in school. Note this position may change with technology advances.

Wearables for medical conditions will be permitted but must also have the functionality to take imagery/videos disabled.

*Staff using a wearable as outlined above for health reasons /medical conditions must complete a Self-Report (see below) detailing the specific name of the wearable and the reason for requiring it.

Headteachers/Principals must confirm in writing (on the SR) that the individual member of staff can use the stated wearable. Permission to wear such a device will be refused if the staff member deviates from the above advice regarding disabling functionality to take imagery/videos.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Young people experiment with illegal online activity, often without understanding the legal or ethical implications. The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a pupil in this area, the CPC report to the relevant local authorities,

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Pupils

Pupils will be taught about how to keep themselves safe online, including being aware of potential risks within the curriculum in an age-appropriate way.

Parents/Carers

The school will use parental communications to reinforce the importance of pupils being safe online. Parents may be supported to understand what systems the school uses to filter and monitor online use. The school will update parents regularly about what their pupils are being asked to do online in school, including the sites they will be asked to access, and with whom they may be interacting with online.

P Child's Voice

We actively promote the view that pupils should feel able to raise any concerns that they may have. Through our ongoing work with the pupils, we aim to build resilience so that every child knows that we are a 'telling school', and that speaking up about any concern is valued and actively promoted. This includes raising a concern about themselves or about another peer or adult.

We take the following measures to ensure that pupils know how to raise a concern:

- Worry boxes
- Direct contact with tutors and class teachers
- Posters in the school to highlight who to contact
- Annual well-being surveys

Q Safer Recruitment

Our school prioritises embedding a culture of safer recruitment as part of our strategy for preventing harm to pupils.

Procedures for checking the suitability of staff and volunteers who work with pupils are contained within Article 32 of the LOPIVI and are reflected in our Safer Recruitment Policy.

R Working in partnership with parents/carers

Staff will in partnership with parents/carers as far as possible. This approach sits within a whole family culture in which the needs of all members of the family are explored as individuals and how their needs impact on one another is drawn out.

Staff will recognise, engage, and work with pupils and parents/carers who may present as unwilling or unable to engage with interventions/advice. It is recognised that engaging safely in some suggested interventions may be more challenging, such as those parents/carers experiencing abusive behaviour within their own intimate relationships, which may include domestic abuse and/or coercive or controlling behaviour, teenage relationship abuse, and 'honour' abuse including forced marriage and female genital mutilation, or abuse related to faith or belief.

Four principles underpin our work with parents/carers:

1. Effective partnership working with parents and carers happens when school staff build strong, positive, trusting, and co-operative relationships by:

   - approaching families and their wider family networks and communities with empathy, respect, compassion, and creativity
   - avoiding reinforcing family shame, suffering, and blaming
   - using strength-based approaches, working with parents/carers to identify what is working well and how their strengths could support them to effect positive change
   - ensuring they work sensitively with parents/carers (and pupils) to identify and understand the impact of adversity and trauma in their lives. They seek to understand how adversity and trauma might manifest and affect pupils and parents' engagement and adapt their response with care and compassion
   - adapting their responses to meet the diverse needs of parents/carers, including fathers and male carers, and the specific challenges being faced, including parents/carers of disabled pupils, and where harm is outside the home (see below)
   - ensuring they understand the families' background, ethnicity, religion, financial situation, ability, education, sex, ages and sexual orientation, and potential barriers these create in seeking and accessing help and support
   - being alert and recognising where parents/carers may not be acting in the best interest of the pupil or where pupils may be experiencing abuse, neglect, and exploitation as a result of actions by parents/carers, or other individuals in their lives
   - being mindful of negative stereotypes when making decisions which might lead to false assumptions

2. Verbal and non-verbal communication should be respectful, non-blaming, clear, inclusive, and adapted to parents' and carers' needs. Staff should ensure that all materials provided to pupils, parents, carers, and families are jargon free, developmentally appropriate and in a format that is easily understood.

3. Where appropriate, material provided to pupils, parents, carers, and families should be made accessible and translated into their first language if necessary. Professional interpreters should be provided where needed. Schools should not need to rely on family members or partners for interpretation services, including British Sign Language.

4. Staff should empower parents and carers to participate in decision-making to help, support and protect pupils by:

- creating a culture of “no surprises”, for example, making parents and carers aware of who will attend meetings and discussions, if the pupil will be invited to participate and the format of the meeting or discussion
- explaining that parents and carers can bring a family member, a friend or supporter to meetings , where appropriate or needed
- giving parents and carers adequate preparation at every stage, relevant information, a safe and appropriate environment for participation and suitable access arrangements
- signposting parents and carers to sources of help and support available locally or through the local authority (see below)
- helping parents and carers to understand what the issues are and how these impact on the pupil, what decisions could be made, what changes need to be made, why and how, timescales and possible outcomes

5. Staff must involve pupils, parents and/or carers in designing processes that affect them. They value their contributions, expertise and knowledge reflecting them in intervention design and continuously seek feedback from them to inform improvements. Schools will use feedback from pupils and parents/ carers to reflect on their own practice.

Part 2: Knowledge Base

For further information and resources, please see KCSIE - Annex A.

A. Categories of abuse: Physical, Emotional, Sexual, and Neglect
B. Domestic Abuse, including controlling or coercive behaviour and Child and Adolescent to Parent Violence and Abuse (CAPVA)
C. Child on Child Abuse, including harassment and violence
D. Problematic Sexual Behaviour, Harmful Sexual Behaviour, Sexual Harassment and Sexual Violence
E. Child Criminal Exploitation and Serious Violence
F. Child Sexual Exploitation, including group CSE
G. Financially Motivated Sexual Exploitation
H. AI Generated Child Sexual Abuse Material
I. Sharing self-generated intimate imagery/video (also known as sharing nudes/semi-nudes), including those generated by AI
J. Honour Based Abuse
K. Forced Marriage
L. Female Genital Mutilation, Virginity testing, Hymenoplasty, and Breast Flattening
M. Faith/belief-related Abuse
N. Behavioural indicators in children
O. Behavioural indicators in adults
P. Grooming
Q. Radicalisation
R. Adverse Childhood Experiences
S. Mental Health
T. Children who may have specific vulnerabilities
U. Stages of early intervention and child protection
V. Contextual Safeguarding
W. Signposting to further information

A Categories of Abuse

Abuse

Abuse is a form of maltreatment of a child.

Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects

All staff should be aware of indicators of abuse, neglect, and/exploitation so that they are able to identify cases of pupils who may need help or protection. Exercising professional curiosity and knowing what to look for is vital for the early identification of possible harm occurring so that staff can identify cases of pupils who may be in need of early intervention or protection.

Pupils may be abused, neglected and/or exploited:

- in a family or in an institutional or community setting known to the, or more rarely, by others
- wholly online, or technology may be used to facilitate offline harm
- by those known to them or, more rarely, by others not known to them
- by an adult (s) or by another child (ren)

Children may also cause harm to other family members, often referred to as child to parent or care giver abuse (see below for CAPVA).

Abuse 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.

The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse
- unexplainable and/or persistent absences from education
- serious violence, criminal exploitation, radicalisation, and
- consensual and non-consensual making or sharing of nudes or semi-nudes

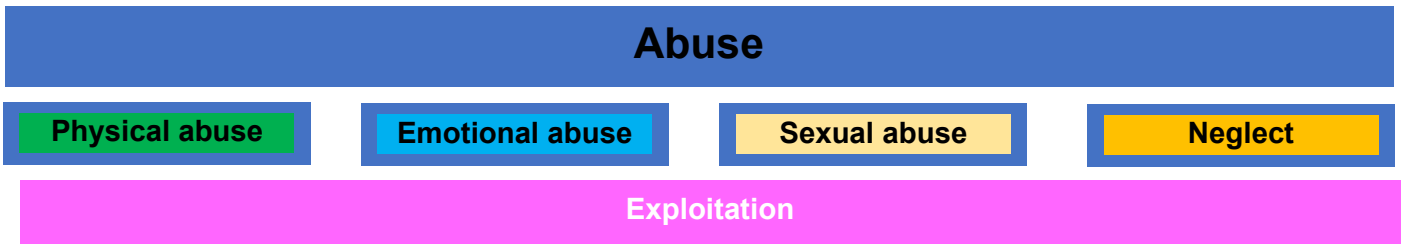
Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex A.

However, most guidance refers to there being four main categories of abuse: physical, emotional, sexual, and neglect.

The LOPIVI (Article 1.2) defines abuse (violencia) as any act, omission, or negligent treatment that deprives pupils of their rights or wellbeing; that threatens or interferes with their physical, mental or

social development, regardless of the form the abuse takes, including via technology and digital means.

This policy will now explore these below.



Physical abuse

Physical abuse is 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.

Signs of physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- respiratory problems from drowning, suffocation, or poisoning
- untreated or inadequately treated injuries
- bruising which looks like hand or finger marks or caused by an implement
- cigarette burns, human bites
- scarring, scalds, and burns

Emotional abuse

Emotional abuse is the *persistent* emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may include verbal abuse, such as the persistent criticism, belittling or name calling, as well as 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 pupils. 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing pupils frequently to feel frightened or in danger, or the exploitation or corruption of pupils. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs of emotional abuse tend to be behavioural rather than physical (see below). Emotional abuse can also be present when children are exposed to parental conflict that is frequent, intense and unresolved.

Sexual abuse

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 or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape penetration with an object), or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving pupils in looking at, or in the production of, sexual images, watching sexual activities, encouraging pupils to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Most sexual abuse is committed by individuals known to the victim. The sexual abuse of pupils by other pupils is a specific safeguarding issue known as child-on child abuse and is explored below. Staff must be aware of child-on-child abuse, and the school systems for dealing with it.

Signs of sexual abuse displayed by pupils may include:

- pregnancy
- sexually transmitted infection/diseases
- pain/itching/bleeding/bruising/discharge to the genital area/anus/mouth
- urinary infections
- difficulty walking, sitting or standing
- persistent sore throats
- stomach-ache
- sexualised behaviour, statements, and/or language that are not age appropriate.
- re-enacting sexual acts with items or other pupils
- reluctance/keenness to undress
- over familiarity, and/or no caution when going to strangers
- reluctance to interact with certain staff (although please remember that some pupils will still have ‘normal’ and often warm interactions with abusing parents, especially if they are younger or have developmental/learning difference)
- wetting after being dry
- soiling/smearing

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, for example, because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

Signs of possible neglect include the child being:

- underweight or small for their age, or their weight deteriorates
- very overweight for their age
- poorly clothed, with inadequate protection from the weather
- often absent from school for no apparent reason; or persistently arrive late
- regularly left alone, or in charge of younger brothers or sisters

Early Years

Pupils in the early years stage are particularly vulnerable to being abused, neglected and/or exploited, and may present differently to older children*. Warning signs often appear as a pattern over time rather than one single incident (although this can also occur).

Therefore, staff must:

- maintain a child-centred approach, ensuring that the pupil's needs and experiences are actively considered and represented in assessments and decision-making. This includes interpreting non-verbal and pre-verbal cues and observing interactions between the pupil and their parents or carers
- be professionally curious, particularly when relying on parent or carer accounts of injuries/illness
- be vigilant to any changes in presentation (pupil and parents/carers)
- consider and know the wider family network, including fathers and male carers, kinship carers, and others providing day-to-day care, recognising that multiple adults may be involved in the pupil's life

All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below).

The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse
- unexplainable and/or persistent absences from education
- serious violence, criminal exploitation, radicalisation,

Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex A (KCSIE 2026).

B **Domestic abuse** including controlling or coercive behaviour, and CAPVA

Domestic Abuse

Pupils can be victims of domestic abuse in their own right if they see, hear or experience the effects of domestic abuse and are related to either victim or perpetrator of the abuse, or either the victim or perpetrator of the abuse has parental responsibility for that child .

They may also experience domestic abuse in their own intimate relationships (teenage relationship abuse).

Domestic violence and abuse may be a single incident or pattern of incidents, and/or a course of conduct which can encompass a wide range of abusive behaviours, including:

a) physical or sexual abuse
b) violent or threatening behaviour
c) controlling or coercive behaviour (see below)
d) economic (financial or monetary) abuse

psychological, emotional, or other abuse such as 'honour' abuse, faith- or belief-based abuse, forced marriage, Female Genital Mutilation or reproductive coercion, harassment and stalking. Exposure to domestic abuse and/or violence can have a serious, detrimental and long-term impact on a child's health, wellbeing, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The national hotline for reporting domestic violence (Violencia de Género) managed by the *Ministerio de Igualdad* in Spain is free of charge and confidential.

- Phone number 016
- WhatsApp number 600 000016
- Online chat
- Email 016-online@igualdad.gob.es

Controlling or coercive behaviour

Controlling or coercive behaviour is a pattern of domestic abuse (on two or more occasions) that involves multiple behaviours and tactics used by a perpetrator to (but not limited to) hurt, humiliate, intimidate, exploit, isolate, and dominate the victim. It is an intentional pattern of behaviour used to exert power, control, or coercion over another person and can also be present in teenage relationships or between a child and adult.

Controlling or coercive behaviour is often committed in conjunction with other forms of abuse and is often part of a wider pattern of abuse, including violent, sexual, or economic abuse.

Children can be used to control or coerce the victim, for example, by frustrating child contact and/or child arrangements, telling the children to call the victim derogatory names or to hit the victim, or by threatening to abduct the children.

This pattern of abuse causes fear, serious alarm and/or distress which can lead to a substantial adverse effect on a victim's day-to-day life. This can have a significant impact on children and young people

Child and Adolescent to Parent Violence and Abuse (CAPVA)

CAPVA describes a pattern in which a child or young person uses physically or emotionally harmful behaviour towards a parent or caregiver in the home. It is more common than most professionals realise, and significantly under-reported.

Families experiencing CAPVA often present to school staff before they reach any other service. The impact shows up in pupil's behaviour, attendance, and emotional wellbeing: presentations that schools are already managing, often without the fuller picture of what is happening at home.

C Child on Child Abuse (including harassment and violence)

Please see Part 3 -Process for information related to managing situations involving child on child abuse.

Child on child abuse is any form of abuse/exploitation perpetrated by a child towards another child (including online)

Abuse is abuse, exploitation is exploitation, and child on child abuse must be taken as seriously as abuse, neglect and/or exploitation by an adult.

All staff must:

- know that pupils are capable of abusing their peers and other pupils (and that this can happen both inside and outside of the school, including online)

- be aware that child-on-child abuse is a safeguarding issue for both the victim (s) and perpetrator(s)
- know that abuse can occur in intimate personal relationships between peers and other children
- be alert to when pupils might be at highest risk around the school day (for example immediately before/after school, during recreational times in school, and on home-school transport)
- be alert to possible indicators of safeguarding concerns which may indicate child on child abuse, know the systems within the school for managing situations involving child-on-child abuse, and understand their role in preventing, identifying, and responding to child-on-child abuse (including the promoting of pupil reporting systems)
- acknowledge that even if there are no reports of child on child abuse it does not mean it is not happening in the school; it may be the case that it is just not being reported by pupils
- assume and take the approach that child on child abuse is occurring, be vigilant at all times, and act accordingly.
- challenge inappropriate behaviour between pupils that are abusive in nature
- never dismiss abusive behaviour, including any form of sexualised behaviour described in this policy, as a normal 'part of growing up', 'banter' or 'just having a laugh' and should not develop high thresholds before taking action. This can lead to a culture of unacceptable behaviour, misogyny, and create an unsafe environment for pupils, and in worse cases a culture that normalises abuse leading to pupils accepting it as normal and not coming forward to report it
- be aware that child-on-child abuse may involve serious physical harm or threats involving weapons
- speak to their CPC or DCPC is they have any concerns regarding child-on-child abuse
- know that child-on-child abuse is **preventable**, and that timely, evidence-based support can be key to preventing pupils from going on to commit abuse or violence.

Child on child abuse can take many different forms, including, but not limited to:

- bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- intimate personal relationship abuse often referred to as "teenage relationship abuse
- domestic violence including coercive or controlling behaviour
- physical abuse such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm (including any online element which facilitates, threatens and/or encourages physical abuse)
- serious physical assault and harm, or the threat of harm with a weapon
- child sexual exploitation
- youth and serious youth violence
- 'upskirting' (see below)

- Problematic and/or harmful sexual behaviour (see below) including misogyny/misandry
- gender-based violence
- 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;
- 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 (including sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse)
- stalking, including within intimate personal relationships
- consensual* and non-consensual creating/sharing of self-generated intimate images and or videos including those generated using AI e.g. deepfakes
- financial exploitation and financially motivated sexual extortion
- creating or sharing AI generated child sexual abuse material
- 'initiation/hazing' violence and rituals, (this could include activities involving harassment, humiliation, abuse, degradation, used as a way of initiating a person into a group and may include an online element)

*Consensual image sharing, especially between older pupils of the same age, may require a different response. It might not be abusive, but pupils still need to know it is illegal, whilst non-consensual is illegal and abusive.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, while pupils who abuse may have power over those who they are abusing, they may be simultaneously powerless to others. Staff should be aware that there may be multiple perpetrators and/or victims and not consider that only one child abuses another in isolation.

Protected Characteristics

Child on child abuse is often motivated by prejudice against particular groups, for example, but not limited to, on grounds of race, religion, gender, sexual orientation, gender identity, special educational needs and/or disability, being neurodivergent or because a child is looked after, is adopted or has caring responsibilities. It might be motivated by actual differences between pupils, or perceived differences including but not limited to physical strength, status and access to economic or other resources. All incidents of child-on-child abuse, both physical, verbal, and emotional, on the basis of protected characteristics must be taken extremely seriously.

When does behaviour become abusive/exploitative?

It can be difficult to distinguish between abusive and/or exploitative behaviour, which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse and/or exploitation.

Factors which may indicate that behaviour is abusive and/or exploitative include:

a) where it is repeated over time and/or where the perpetrator (s) intended to cause serious harm
b) where there is an element of coercion or pre-planning
c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth.

This list is not exhaustive, and staff should always use their professional judgment and discuss any concerns with the CPC, who in turn should seek guidance from the RSL where needed.

How can staff identify victims of child-on-child abuse?

Identifying child on child abuse can be achieved by being alert to changes in pupils' well-being and to general signs of abuse and/or exploitation. Signs that a child(ren) may be suffering from child-on-child abuse overlap with those relating to other types of abuse, neglect and/or exploitation – see indicators , earlier in this document.

Signs can include, but are not limited to:

- unexplained, persistent and/or prolonged absence from school
- disengaging from classes, or struggling to carry out school related tasks to the standard staff would ordinarily expect from the individual child i.e. a change
- physical injuries (often with inconsistent accounts)
- having difficulties with their mental health and/or emotional wellbeing
- becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much
- new (or increased) access to drugs and/or alcohol use
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age including sexualised behaviours
- change in health needs, including sexually transmitted infections and unwanted pregnancy
- changes in social groups,
- avoidance of certain areas of school or community
- reluctance to go home

This list is not exhaustive and the presence of one or more of these signs does not necessarily indicate child on child abuse and/or sexually coerced exploitation.

Are some pupils particularly susceptible/vulnerable ?

Any child can be affected by child-on-child abuse and/or exploitation; however, research suggests that:

- Child on child abuse is more prevalent amongst pupils aged 10 and older, although it also affects younger pupils, including by way of harmful sexual behaviour.
- Pupils who are particularly vulnerable to abuse /exploitation or to abusing/exploiting others include those who have

  (i) witnessed or experienced abuse, exploitation or violence themselves
  (ii) suffered from the loss of a close family member or friend (recent or historical)
  (iii) experienced considerable disruption in their lives.

- as stated above, pupils with protected characteristics, but especially those with SEN/D and those who identify as LGBTQ+ or gender questioning/transitioning are particularly vulnerable to child-on-child abuse, often in the form of bullying (both direct and online).

Risks can be compounded where pupils lack a trusted adult with whom they can be open. The school will endeavour to reduce the additional barriers faced and provide a safe space for these groups of vulnerable pupils to speak out or share their concerns with trusted members of staff.

How prevalent is child on child abuse?

Recent research suggests that child-on-child abuse is one of the most common forms of abuse affecting pupils. For example:

- 25% pupils had experienced some kind of aggression at least once or twice in the past three months and 12.1% indicated they had been victims of bullying (Spain)
- 20% and 25% of child sexual abuse is committed by other pupils (Australia). In the UK, this figure is closer to 35%.
- 41.3% of boys and 28.3 % of girls, who participated in a cross-national study reported that they were involved with bullying over two or three times per month either as bullies, as victims or as bullies/victims. Another study conducted in a sample of 369 pupils reported a percentage of 22.8% of victims in primary schools (Greece).
- 42% of students report being subjected to harassment by peers in secondary school (India).
- 9% of young people have received sexual threats online from people their age in the last year (Australia)
- 29% have witnessed people their age making sexual threats, for example unwanted sexual behaviour or violence, in the last year (Denmark, Hungary and the UK).
- 10% of female higher education students in a partnered relationship report experiencing intimate partner violence (United States)

How does the school raise awareness of, and reduce the risk, of child-on-child abuse?

Staff are trained on the nature, prevalence, and effect of child-on-child abuse, and how to prevent, identify and respond to it. The school actively seeks to prevent all forms of child-on-child abuse by

educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of child-on-child abuse and any cases of bullying or cyber-bullying promptly, fairly and appropriately.

Pupils are educated about the nature and prevalence of child-on-child abuse through COMPASS lessons and workshops, they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the school's approach to such issues, including its zero-tolerance policy towards all forms of bullying and child on child abuse, including sexual violence and sexual harassment (see below).

D Problematic Sexual Behaviour, Harmful Sexual Behaviour, Sexual Violence and Sexual Harassment

Please see Part 3-Process for more information related to managing situations involving problematic Sexual Behaviour (PSB), Harmful Sexual Behaviour (HSB), Sexual Harassment and Sexual Violence

Child on child abuse can include four specific forms, known as Problematic Sexual Behaviour (PSB), Harmful Sexual Behaviour (HSB), Sexual Harassment and Sexual Violence.

The above sexual behaviours exist on a continuum ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. They also may overlap; therefore all staff working in the school should recognise the scale. The Hackett continuum (2010) provides a framework to understand the spectrum (range) of sexualised behaviour.

Staff must be aware that the behaviours can happen anywhere, can occur online and face-to-face (both physically and verbally) and are never acceptable.

All staff should understand that even if there are no reports of PSB, HSB, Sexual Harassment and/or Sexual Violence, in the school, it does not mean it is not happening; it may be the case that it is just not being reported by the pupils involved. Staff must, therefore, maintain an attitude of ‘it could happen here’, assume that it is happening, and act accordingly.

Impact

Children who are victims of sexual violence and sexual harassment wherever and however it happens, may find the experience stressful and distressing. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

It is important that schools consider sexual harassment in broad terms. Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

This policy will now consider the continuum of sexual behaviours:

Problematic Sexual Behaviour (PSB)

PSB refers to developmentally inappropriate or socially unexpected, sexualised behaviour which does not have an overt element of victimisation or abuse (NSPCC 2026).

Harmful Sexual Behaviour (HSB)

The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context. HSB is a broad term used to describe sexual actions by children that are developmentally inappropriate, cause harm to themselves or others, or are abusive towards another person (Hackett 2014). Other resources include the use of violence.

HSB is evaluated by considering the child's age, physical size, cognitive and emotional understanding, and whether there is an element of coercion, force, or a significant power imbalance. Distinguishing between experimental childhood sexual behaviour, problematic, and more concerning or harmful sexual behaviour can be a complex task and must be considered on a case-by-case basis.

Key Characteristics

Behaviours are typically classified as HSB if they exhibit one or more of the following:

- Developmental Inappropriateness: Actions or language that are far beyond the expected norm for a child's specific age group
- Coercion or Force: Making threats, bribing, or using physical dominance to force another child or adult into sexual activity.
- Power Imbalances: Significant differences in age, physical size, or developmental stage between the individuals involved.
- Secrecy and Shame: Using covert tactics or attempting to hide the behaviour due to knowing it is wrong.

Causal factors

There are a variety of factors that may contribute to a child or young person engaging in HSB, and often a combination of factors:

- difficulties with their family or home environment
- experience of trauma or abuse and/or disrupted care
- struggling in relationships with peers (those around their age) and poor social skills
- poor self-regulation and coping skills
- experience of social anxiety and a sense of social inadequacy, that makes it difficult to get on with other people and creates a sense of not “fitting in”
- poorly internalised rules for social behaviour
- a poor sense of acceptable personal boundaries like getting too close to people, not understanding social rules, not understanding what to say or to someone in a particular situation.
- difficulties forming secure and confident emotional attachments to other people
- lack of self-control, acting out their emotional experiences through negative or otherwise inappropriate behaviour.
- little insight into the feelings and needs of other people, and other people’s own mental state
- placing their own needs and feelings ahead of the needs and feelings of others.

HSB includes and often intersects with misogyny. Misogyny is defined as hostile or discriminatory beliefs and behaviours towards women and girls, both online and offline. It can include rape myths, sexist stereotypes, harmful masculine norms, hypermasculinity, and hostile beliefs and behaviours directed at women and girls from minoritised groups. In some children, inappropriate and PSB/HSB may already include elements of misogynistic attitudes or be motivated by gendered power. Where misogynistic ideas are expressed at school, staff should be conscious of everyday sexism, misogyny, homophobia and stereotypes, and should take action to build a culture where prejudice is identified and tackled, challenging the ideas, rather than the person expressing them. Staff have an important role in modelling positive behaviour and avoiding language that might perpetuate harmful stereotypes.

Factors influencing HSB

- the child’s age
- what the child observes (including the sexual behaviours of family and friends, and what they may have accessed through technology)
- what the child is taught (including cultural and religious beliefs concerning sexuality and physical boundaries).

Prevalence

There has been a sharp increase in children displaying HSB (offences up 47% in 2023–24 and rising again by 6% in 2024–25). Approximately 97% of sexual offences were committed by boys (Youth Justice Board (2026). Youth justice statistics: 2024 to 2025), however, not all HSB targets girls, as boys and LGBTQ+ children can also be harmed. Children with disabilities are also three times more likely to be abused than their peers (KCSIE 2026).

Research shows that most children who display HSB do not automatically become sexual offenders as adults, especially with the right interventions. Intervention focuses on education, building resilience, challenging harmful attitudes, and helping the young person understand healthy boundaries, intimacy, and consent. Having a sense of belonging has been identified as an important protective factor in preventing children from engaging in HSB.

Technology-assisted HSB (TA-HSB)

HSB can also take place through digital platforms or online. This is known as 'technology-assisted harmful sexual behaviour'

Sibling sexual abuse

Sometimes the term 'sibling sexual abuse' is used if HSB happens between siblings and needs assessment and intervention.

Sexual Violence includes sexual offences

Pupils and staff should understand that anyone can be a victim of sexual violence, regardless of sex, sexual orientation, gender reassignment or any other protected characteristic, and that the victim is never to blame.

It is important to acknowledge that most sexual violence is committed against women and girls, and it often has a gendered component – for example, manifesting an inequality of power between men and women. However, anyone can be affected by sexual violence, and staff should avoid language which stigmatises boys or suggests that boys or men are always perpetrators or that girls or women are always victims. Pupils and staff should understand the importance of challenging harmful beliefs and attitudes and should understand the links between sexism and misogyny and violence against women and girls.

All staff must be aware that child-on-child sexual violence can, and does occur, both inside and outside of school. Violence can often peak in the hours just before or just after school, when pupils are travelling to and from school, and can concentrate in particular places. These times can potentially have the highest risk for pupils, so it is important for schools to try to understand the local context and identify where these places are by listening to pupils and asking them where they feel unsafe at regular intervals. CPCs can then liaise with local partners in a collaborative way.

Sexual Violence includes sexual offences

Rape: A person (A) commits an offence of rape if: they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

What consent is: Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice

- 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

Sexual Harassment refers to 'unwanted conduct of a sexual nature'.

This can occur online (including, but not limited to non-consensual sharing of images, making sexual comments on social media) and offline sexual harassment including but not limited to:

- making sexual comments about clothing or appearance
- telling sexual stories
- making lewd comments
- sexual taunting and/or name calling or 'jokes'
- displaying pictures, photos or drawings of a sexual nature
- upskirting (see below).
- and physical contact, for example, brushing against someone deliberately or interfering with their clothes.)

It is important to assess whether the latter behaviours have crossed into sexual violence- it is vital to talk to and consider the experience of the victim.

Online sexual harassment

This may occur independently, or as a broader pattern of sexual harassment and/or sexual violence.

- consensual and non-consensual sharing of self-generated intimate images and/or videos, including those generated using AI e.g. deepfakes*.
- sharing of unwanted explicit content
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats, and
- coercing others into sharing intimate images/videos of themselves or performing acts they are not comfortable with online.

*Taking and sharing nude photographs (including those generated using AI e.g. deepfakes) of those aged under 18 is a criminal offence.

Such behaviour can:

- Violate a child's dignity
- Make them feel intimidated, degraded or humiliated; and
- Create a hostile, offensive or sexualised environment

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, and/ or alarm. It is a criminal offence. Anyone of any gender, or sexual orientation can be a victim or perpetrator.

In Spain, upskirting is considered a form of sexual harassment and is illegal. Specifically, it falls under the broader category of sexual offenses and is addressed by the Criminal Code, which includes provisions for various forms of sexual harassment, including those involving images or recordings taken without consent.

Who perpetrates PSB, HSB, sexual violence and/or harassment?

PSB, HSB, Sexual Violence and Sexual Harassment can:

- occur between any two pupils, or a group of pupils against one individual or group
- be perpetrated by a child of any age against a child of any age
- be perpetrated by a child of any sexual orientation against a child of any sexual orientation
- include behaviour that exists on an often-progressive continuum and may overlap
- be online and offline (physical or verbal)
- can take place within intimate personal relationships between pupils

Vulnerabilities

Any report of PSB, HSB, sexual violence or sexual harassment must be taken seriously.

Staff should be aware, that according to research, it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. However, staff must always maintain an open mind.

Pupils with Special Educational Needs (SEN) are potentially more vulnerable, and there may be barriers in recognising abuse in this group of pupils. In addition, pupils who are perceived by their peers to be LGBTQ+ or identify themselves as LGBTQ+ and similarly those who are questioning their gender may potentially be more vulnerable (see above).

Signs and Indicators

All staff should be aware of the indicators in a pupil which may include, but not be limited to;

- increased absence from school, including truanting or going missing
- a change in friendships or relationships with older individuals or groups
- a significant change or decline in performance
- a significant change or decline in presentation
- signs of self-harm and/or suicidal ideation or a significant change/decline in wellbeing
- signs of physical assault or unexplained injuries
- unexplained gifts, money and/ or new possessions

Our approach to PSB, HSB, Sexual Violence and Sexual Harassment

The school will apply the principles set out in the above document when considering its approach to PSB, HSB, Sexual Violence, and/or Sexual Harassment between pupils. Tolerating PSB, HSB and Sexual Harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to Sexual Violence.

The CPC and DCPCs must have a good understanding of the sexual behaviour continuum in order to respond effectively to situations. This knowledge will support preventative education and embed the whole school approach to safeguarding. Staff also need to understand child development and healthy developmentally appropriate behaviour, as well as issues of informed consent, power imbalances, and exploitation,

In this school we will:

- notice changes to pupil's behaviour, and be vigilant to them showing signs that signal distress
- recognise that a pupil may disclose to someone they trust, and that this could be anyone in the school. Staff should recognise the significance of being chosen, and respond with empathy

- recognise that the initial disclosure may not reflect the full extent of the abuse, and that trauma can impact memory meaning details may be affected (ask where, when, what etc i.e. open-ended questions)
- keep in mind that certain pupils may face additional barriers to disclosure (see above Vulnerabilities).
- not accept or tolerate PSB, HSB, Sexual Violence and/or Sexual Harassment, or upskirting
- not downplay or consider that these types of behaviours are 'banter', an 'inevitable part of growing up' or hold the view that 'boys will be boys', knowing that to do so may normalise inappropriate behaviours may create an unsafe culture where children pupils feel less able to come forward with concerns
- recognising the escalatory nature of misogyny and the benefits that early identification plays in minimising the risk of PSB, HSB, Sexual Harassment and Sexual Violence
- encourage early intervention to avoid potential escalation, acting on any concerns immediately
- challenge inappropriate physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts
- challenge inappropriate verbal behaviour, such as making sexist comments, innuendo or taunting
- align with their Behaviour Policy with regards to imposing sanctions for inappropriate behaviour, including PSB, HSB, Sexual Harassment and/or Sexual Violence
- embed training and education on these issues within a strong pastoral system
- adopt a planned and sequenced programme across the whole curriculum including age-appropriate content around: consent, gender roles, misogyny, stereotyping and equality, healthy relationships, and power imbalances in relationships
- develop and encourage forums that enable pupils to talk about issues openly
- have and promote clear and accessible systems in place for pupils to confidently report abuse, knowing their concerns will be treated seriously,
- act in the best interests of all pupils involved, reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment
- manage any disclosure, either from the pupil who has suffered abuse or from other pupils, giving the victim(s) as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect them and other pupils
- carry out a risk and needs assessment for pupils affected by sexual violence or sexual harassment, including both the victim and alleged perpetrator- this may be informed by risk assessments completed/advice by external services

- engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence The exception to this rule is if there is a reason to believe informing a parent or carer will put a pupil at additional risk.

Response

All sexual behaviour, whatever stage of the continuum it falls under, requires a response. However, the type of response required, and whoever offers that response, depends on the sexual behaviour and the pupil(s) displaying the behaviour. Schools must act appropriately to support and protect any pupils who have displayed behaviours and those who have been impacted by their behaviour.

The school will:

- act in the best interests of all pupils involved, reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting PSB, HSB, Sexual Violence and/or Sexual Harassment
- manage any disclosure, either from the pupil who has suffered abuse or from other pupils, giving the victim(s) as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered, respecting their wishes. This will however need to be balanced with the school's duty and responsibilities to protect them and other pupils
- when assessing sexual behaviours, consider the ages and developmental stage of any pupils involved. Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years' difference or if one is pre-pubescent and the other is not. However, a younger child may also abuse an older child, especially if they hold power over them, e.g. due to a disability or physical size.
- when responding to incidents that involve self-generated imagery/videos (commonly referred to as nudes and semi nudes), including those generated by AI, whilst considering the legality of the situation, use a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.
- carry out a risk and needs assessment for all pupils affected by PSB, HSB, Sexual Violence and/or Sexual Harassment, including both the victim (s) and alleged perpetrator (s)- this may be informed by risk assessments completed/advice by external services. This risk assessment must include:
    - the victim's safety and support needs
    - potential other victims
    - the alleged perpetrator (s)
    - the wider school or community, and any actions that are needed to protect them from the alleged perpetrator (s) or from future harms

- the location and time of the incident, with steps to improve safety in that area
- engage with both the victim's and the alleged perpetrator's parents/carers when there has been a report of PSB, HSB, Sexual Harassment and/or Sexual Violence The exception to this rule is if there is a reason to believe informing a parent/carer will put a pupil at additional risk. Schools will take advice from local authority children's Social Care regarding the latter (or Police if involved)
- consider the importance of understanding intra familial harms and any necessary support for siblings following incidents involving PSB, HSB, Sexual Violence and/or Sexual Harassment
- manage reports with two members of staff present, where operationally possible (one being the CPC/DCPC)
- not promise confidentiality to the pupil (s) involved as it is very likely that a concern will have to be shared further
- ensure that a written record is made of the incident/disclosure, and all actions taken

Situations will be taken on a case-by-case basis, however, individual pupils who have carried out PSB, HSB or Sexual Harassment may likely be referred to social services. The Police and social services will be involved in all cases where Sexual Violence has been reported.

A Safeguarding Risk Assessment must be completed for any pupil exhibiting any form of PSB, HSB, Sexual Harassment and/or Sexual Violence (and sent to the RSL for review).

More widely, school-based, age-appropriate curriculum linked interventions, often in RSHE lessons will be the most common approach to preventing behaviours (including misogyny), aiming to shift knowledge, attitudes, social norms, interpersonal skills, and bystander behaviours, with the latter sessions promoting empathy, and willingness to intervene.

E Child Criminal Exploitation, including Serious Violence

Child Criminal Exploitation (CCE) is where an individual and/or group takes advantage of an imbalance of power to coerce, control, manipulate, exploit, and/or deceive a child into any criminal activity:

a) in exchange for something the victim needs or wants; and/or
b) for the financial or other advantage of the perpetrator or facilitator; and/or
c) through violence or the threat of violence.

CCE does not always involve physical contact; it can also occur through the use of technology.

The victim may have been criminally exploited even if the activity appears consensual. CCE can be committed or facilitated by an organised network or gang, and victims may identify as part of this group All children who are criminally exploited should have their vulnerabilities recognised by adults

and professionals and should be treated as victims. It is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited and/or abused.

CCE can also include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, again they cannot give informed consent for this. Further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE is identified

Debt Bondage

Children can become trapped by this type of CCE, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. This is known as 'debt bondage'.

Debt bondage is when someone forces or pressures a child to do things, saying that the child owes them money or drugs or something else they've been given. Sometimes the child may be told they are in debt without being given a reason , or as an excuse to threaten them.

The child might be forced:

- Work for someone to pay them back
- Deliver packages or hold onto things
- Do something sexual, or send self-generated, intimate images/videos
- Commit crimes or take part in something illegal
- Hurt someone or do other jobs for the group

Vulnerabilities

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may also be at higher risk of sexual exploitation.

Indicators

All staff should be aware of indicators which may signal that pupils are susceptible and/or at risk from, and/or are involved with, serious violent crime. These can include but are not limited to:

- increased absence from school, including truanting, being late, and going missing
- a change in friendships or relationships with older individuals and/or groups
- association with other children who have been involved in exploitation
- a significant change/ decline in academic performance
- a significant change/decline in presentation

- signs of self-harm, suicidal ideation, or a significant change/decline in wellbeing
- unexplained gifts, money or new possessions
- signs of physical assault or unexplained injuries

Serious Violence

Serious violence may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in violence (who may also be victims themselves).

Risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions) or a history of offending. Early, evidence-based support for those considered at risk, as well as in 'teachable moments' when issues emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support.

Staff must:

- be alert to signs that a pupil may be at risk of or involved in serious violence
- be alert to when pupils might be at highest risk around the school day (after/before school)
- immediately and verbally report any concerns about a pupil carrying or using a weapon (or expressing intent to do so) to the CPC/DCPC who will assess the risk and take appropriate action. Where relevant. this will include any action needed to de-escalate peer conflict, and/or to contacting the Police as necessary

F Child Sexual Exploitation, including group-based CSE

Child Sexual Exploitation (CSE) is a form of child sexual abuse (see above) and occurs where an individual and/or group takes advantage of an imbalance in power to coerce, manipulate, exploit and/ or deceive a child into sexual activity.

Whilst age may be the most obvious factor, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

CSE 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. CSE, as well as being directly physical, can also be facilitated and/or take place online, or using a combination of offline/online exploitation and harm.

CSE can be perpetrated by individuals or groups, or an organised network, males or females, and children or adults. Most sexual abuse is committed by those previously known to the victim.

The abuse can be a one-off occurrence or a series of incidents over time, and may happen without the child's immediate knowledge, for example through others copying/sharing videos or images of them on social media. The latter can be of the actual victim child, or those stating that the content is of the actual child, when it is not; AI generated imagery/videos can be used. Either way, this is exploitation and has harmed a child. It may and range from opportunistic to complex organised abuse. Victims can be exploited even when activity appears consensual as they may not realise that they are being exploited/harmed. They may believe that they are in a genuine romantic relationship. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds, who can legally consent to have sex.

It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence, both to the child and/or someone they know. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion.

CSE can also include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CSE is identified. The above CCE indicators can also be indicators of CSE, as can:

- pupils who have older boyfriends or girlfriends; and
- pupils who suffer from sexually transmitted infections or become pregnant.

Group-based child sexual exploitation

Group-based CSE is defined as two or more individuals (whether identified or not) who are known to (or associated with) one another and are known to be involved in or to facilitate the sexual exploitation of children. Being involved in the sexual exploitation of children includes e.g. introducing them to other individuals for the purpose of exploitation, trafficking a child for the purpose of sexual exploitation, taking payment for sexual activities with a child or allowing their property to be used for

sexual activities with a child, etc. This can be perpetrated within or beyond the family, by both children and adults, and groups can be organised or loosely linked.

G Financially Motivated Sexual Extortion

Increasingly, children are being sexually coerced and exploited for *money*, rather than any sexual motivation underpinning the actions of the offender. The offender (known, posing as known, or unknown pupils/staff) will demand the victim child self- generate intimate imagery/videos (see below) and send this to them. Whether or not the victim child actually sends these self-generated images/videos, the perpetrator will blackmail the victim by threatening to share these or other images online, and occasionally offline, with the wider community i.e. family, friends, staff and/or media unless the child victim sends money/other to them. This is sometimes known as 'sextortion' and there has been a rapid increase in these situations being reported; many cases of course will not have been reported by pupils for a number of reasons.

Some young people have had deteriorating mental health due to this extortion. For this reason, the school will hold an 'open door' and supportive approach in regard to pupils sending self-generated intimate images/video, rather than seeking to criminalise them. This approach will enable pupils to feel able to share that they have shared self-generated intimate images/video, or been asked to do this, with the aim that they can receive the support they so vitally may need in a timely manner. This is not the same as condoning or accepting the sharing of images/videos as the norm. The school is mindful that much of this behaviour is illegal and will follow their statutory duties where appropriate, including reporting matters on a case-by-case basis to the authorities as needed.

H Self-generated Intimate Images/Videos (also known as the sharing of nudes and semi-nudes) including those generated by AI

Please note that young people most commonly use the term 'nudes and semi-nudes'. Where this section refers to self-generated imagery/videos below, therefore please note that this includes nudes and semi nudes

This policy only covers the sharing of self-generated intimate sexual imagery/videos by pupils, including those generated by AI e.g. deepfakes.

Possessing, creating, sharing and distributing sexual images/videos of under-18s is illegal, and therefore causes the greatest complexity for schools (amongst other agencies) when responding.

It also presents a range of risks which need careful management.

Staff must not ever view or forward illegal images of a child.

Should they receive such from any source, then they must notify the CPC immediately.

What types of incidents are covered by this policy?

Please note that the below also includes any images/videos created by AI e.g. deepfakes.

Yes:

- A child creates and shares self-generated intimate images/videos of themselves with another child (also under the age of 18).
- A child shares self-generated intimate images/videos created by another child with another child (also under the age of 18) or an adult.
- A child is in possession of self-generated intimate images/videos created by another child.
- A pupil creates and shares AI generated sexual images/videos of a staff member (this will also be managed under the Behaviour Policy)

No:

- The sharing of self-generated intimate images/videos of pupils by staff constitutes child sexual abuse and schools must always inform the Police if they hear this has occurred or find this content on a child/adult's device (or confirmed searches). Images/searches of this kind must not be deleted from a child or adult's phone.
- Pupils sharing pornography or exchanging sexual texts which do not contain imagery[1].
- Sexual imagery downloaded from the internet by a child[2].
- Sexual imagery downloaded from the internet by a child and shared with another child (also under the age of 18) or an adult.
- AI generated Child Sexual Abuse Material (CSAM) by adults (see below section)

Disclosure

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. All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving the sharing of self-generated intimate images/videos, including those generated by AI This will be covered within staff training.

Disclosure about can happen in a variety of ways. The child affected may inform a class teacher, the CPC in school, or any member of the school staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school or a colleague or inform the Police directly. Any direct disclosure by a child should be taken very seriously. A child who discloses they are the subject of self-generated intimate images/videos, or those generated by AI is likely to be

[1] All such incidents should be responded to with reference to the school's Online Safety Policy, and in line with the school's Safeguarding Policy

[2] As above

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.

I AI Generated Child Sexual Abuse Material (CSAM)

The use of Artificial Intelligence (AI) to generate Child Sexual Abuse Material (CSAM) is increasing, and the technology is fast improving. As with all online safety challenges, this challenge is inherently international.

The term 'AI CSAM' refers to criminal images or videos of the sexual abuse of pupils that are generated or edited by AI technology, and 'real CSAM' to clearly distinguish CSAM that is not generated or edited by AI technology.

The term 'deepfake' is used variously in the AI field, in the media, and among the wider population. Sometimes it is taken to refer to all AI-generated or AI-edited content.

This policy uses the term 'deepfake' to refer to partially synthetic content: edited content that is based on a real image or video but has been altered using AI technology. Incredibly realistic deepfake, or partially synthetic, videos of child rape and torture are made by offenders using AI tools that add the face or likeness of a real person or victim.

This is particularly important in the context of 'deepfake videos' edited (or 'faked') real videos which should be clearly distinguished from fully synthetic videos created by text-to-video or text-to-image-to-video.

The Internet Watch Foundation (IWF) stated in their most recent report (2026) the following 5 key findings:

- **AI CSAM is widespread and growing**: In 2025, the IWF assessed 8,029 AI-generated images and videos as showing realistic child sexual abuse. This imagery appears across both dark web and mainstream commercial platforms on the clear web.
- **AI CSAM is increasingly extreme and sophisticated**: Realistic full-motion AI video content is now commonplace. 65% of videos (2,233 in total) identified by the IWF last year were classified as Category A, the most extreme classification.
- **AI CSAM causes real harm and is highly gendered**: Generative models can be trained and fine-tuned using photographic abuse imagery, directly re-victimising survivors. AI CSAM fuels sexual interest in pupils, normalises extreme violence, and increases the risk of contact offending.

- **AI child sexual abuse chatbots are accessible on the clear web**: IWF Analysts have identified AI-generated child sexual abuse images shared on AI chatbot services, which encourage users to act out simulated child sexual abuse scenarios.
- **AI CSAM tools are converging** Advances in AI have driven the convergence of tools that previously required separate capabilities. Single applications can now generate abusive imagery with minimal effort, removing the need for technical expertise and significantly lowering barriers to entry.

J Honour Based Abuse (HBA)

HBA includes all incidents or crimes which have been committed to protect or defend the honour of the community and/or the family, and commonly involve practices such as FGM, forced marriage and/or breast flattening. Abuse often involves a wider network of family or community pressure and can include multiple perpetrators and therefore it is important to be aware of this dynamic and consider additional risk factors when deciding on action. If staff have a concern that a child may be at risk of Honour Based Abuse, they must alert their CPC immediately.

K Forced Marriage (FM)

FM is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage.

The Civil Code in Spain states that the legal marriage age is 18. This applies to any legal resident in Spain wishing to marry or form a civil partnership with another legal resident or Spanish national.

L Female Genital Mutilation, Virginity testing and Hymenoplasty, and Breast Flattening

Female Genital Mutilation

Female Genital Mutilation is illegal. It is abuse that encompasses all procedures involved in the partial or total removal of female external genitalia.

All staff should speak to the CPC (or deputy CPC) with regards to any concerns about FGM.

Virginity testing and Hymenoplasty

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of so called ‘honour-based’ abuse.

Virginity Testing

'Virginity testing' is "the examination of female genitalia, with or without consent, for the purpose (or purported purpose) of determining virginity." It is also referred to as hymen, '2-finger' or vaginal examination, is an inspection (with or without contact) of the female genitalia, intended to determine whether a woman or girl has had vaginal sexual intercourse. This is irrespective of whether consent has been given.

The hymen is a thin membrane that partially covers the entrance to the vagina. During puberty, oestrogen causes the hymen to change in appearance and become very elastic. Normal variations of the post-pubertal hymen range from thin and stretchy to thick and somewhat rigid. A non-intact, or stretched, hymen is not a reliable indication of past sexual activity, nor is it guaranteed that the hymen will break or bleed after the first vaginal intercourse.

Hymenoplasty

Hymenoplasty is the reconstruction of the hymen (with or without consent).

There are a number of different techniques to achieve but it generally involves stitching hymenal remnants together at the vaginal opening or surgically reconstructing a hymen using vaginal tissue. The aim of the procedure is to ensure that a woman bleeds the next time she has intercourse to give the impression that she has no history of vaginal intercourse. There is no guarantee that this will fully reform the hymen or cause bleeding when penetration is attempted.

Both virginity testing and hymenoplasty can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Women who 'fail' a virginity test, are found to have undergone a hymen reconstruction, or do not bleed on their wedding night are likely to experience further so called 'honour-based' abuse including emotional and physical abuse, family or community disownment and even honour killings.

Emotional impact: The practices are degrading and intrusive. They can lead to extreme psychological trauma in the victim, and can provoke conditions including anxiety, depression and post-traumatic stress disorder. The practices have been linked to suicide.

Physical impact: They can be physically harmful. For example, virginity testing can result in damage to the hymen, tears and damage to the vaginal wall, bleeding, and infection. The risk of infection is also high in hymenoplasty, which has the added risks of acute bleeding during the procedure, scarring and narrowing of the opening of the vagina and sexual difficulties. Virginity testing and hymenoplasty are considered to have a similar level of seriousness to assault occasioning actual bodily harm. This is in recognition of the physical harm they can cause to the individual who is subjected to them. This level of seriousness also reflects the controlling attitudes that underpin the practices.

Prevalence: there is evidence that women and girls from the age of 13 are most at risk of undergoing a virginity test and/or hymenoplasty, but girls as young as 8 can be affected. As with other forms of

so-called honour-based' abuse, these practices often take place behind closed doors, and because of this, the numbers of women and girls that are subjected to these practices are not known.

Who: any woman or girl, of any age, ethnicity, race, sexual orientation, religion, disability or socioeconomic status could be subjected to a virginity test or hymenoplasty.

Why: Women and girls are coerced, forced and shamed into undergoing these procedures, often pressurised by family members or their intended husbands' family in the name of supposedly upholding honour and to fulfil the requirement that a woman remains 'pure' before marriage. Some practitioners issue a certificate to prove 'virginity' after a virginity test or hymenoplasty, while some will simply tell the family or community members whether a woman or girl has 'passed' a virginity test.

Signs and Indicators: there are several indicators that a girl is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- the girl requests either procedure or asks for help
- family members ask for the procedures or disclose that the girl has already undergone the practices
- there could be pain and discomfort after the procedures, which, for example, could result in the girl having difficulty walking or sitting for a long period of time, which was not a problem previously
- concern from family members that a girl has a boyfriend, or plans for the girl to be married
- a close female relative has been threatened with either procedure or has already been subjected to one
- the girl has already experienced or is at risk of other forms of so called 'honour-based' abuse
- the girl is already known to children's Social Services in relation to other safeguarding issues
- the girl may disclose other concerns that could be an indication of abuse. For example, they may state that they do not feel safe at home, that family members will not let them out of the house and/or that family members are controlling
- the girl may have suffered trauma from being coerced and having to undergo the procedures. This could result in an increase in emotional and psychological needs, for example withdrawal, anxiety or depression, or significant change in behaviour. The trauma could also have long-term implications for the girl and may not manifest for many years after the event
- the girl may appear fearful of their family or a particular family member
- unexplained absence from school, potentially to go abroad
- changes in behaviour – becoming withdrawn, anxious, or depressed; a deterioration in schoolwork, attendance, or attainment

This is not an exhaustive list of indicators. If any of these indicators are identified, staff must inform the CPC and follow safeguarding procedures.

Breast Flattening

Breast flattening, also known as breast ironing, is the pounding and massaging of a pubescent's breasts. Hard or heated objects are used, to try to make the breasts stop developing or disappear. The practice is typically carried out by the girl's mother, who will say she is trying to protect the girl from sexual harassment and rape to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue education, rather than be forced into early marriage.

M Faith or belief- related child abuse

As a school, we respect, and do not challenge parents' rights to have faiths or beliefs, but where these may/have led to abuse and/or a risk of harm to a child, we will seek advice from the authorities as required.

What is faith/belief related abuse?

Abuse linked to faith or belief is where concerns for a child's welfare have been identified, and could be caused by a belief in witchcraft, spirit or demonic possession, ritual or satanic abuse features; or when practices linked to faith or belief are harmful to a child.

It is important to note that child abuse linked to faith or belief is not confined to one faith, nationality, and/ or ethnic community. Examples of this form of abuse have been recorded worldwide across various religions including Christians, Muslims, and Hindus. The number of known cases suggests that only a small minority of people who believe in witchcraft or spirit possession go on to abuse pupils and staff. Abuse may happen anywhere, but it most commonly occurs within the child's home. Under-reporting of abuse is, however, likely.

Harm to a child can take place due to the following known reasons:

- abuse as a result of a child being accused of being a 'witch'
- abuse as a result of a child being accused of being possessed by 'evil spirits'
- ritualistic abuse which is prolonged sexual, physical and psychological abuse
- satanic abuse which is carried out in the name of 'satan' and may have links to cults
- any other harmful practice linked to a belief or faith

In terms of the categories, explored above in section A:

Physical abuse: can involve ritualistic beating, burning, cutting, stabbing, semi-strangulating, tying up the child, or rubbing chilli peppers or other substances on the child's genitals or eyes.

Emotional abuse: can occur in the form of isolation. A child may not be allowed near or to share a room with family members and threatened with abandonment. The child may also be convinced that they are possessed.

Neglect: the child's family and community may have failed to ensure appropriate medical care, supervision, education, good hygiene, nourishment, clothing or warmth.

Sexual abuse: pupils who have been singled out in this way can be particularly vulnerable to sexual abusers within the family, community or faith organisation. These people exploit the belief as a form of control or threat.

Common factors and causes

A range of factors can contribute to the abuse of a child for reasons of faith or belief. Some of the most common ones are below:

Belief in evil spirits that can 'possess' pupils is often accompanied by a belief that a possessed child can 'infect' others with the condition. This could be through contact with shared food or simply being in the presence of the child.

Scapegoating occurs when a child is singled out as the cause of misfortune within the home, such as financial difficulties, divorce, infidelity, illness or death.

Behaviour that is attributed to spiritual forces. Examples include a child being perceived as disobedient, rebellious, overly independent, wetting the bed, having nightmares or falling ill.

Physical, learning, and/or emotional differences that single a child out. Documented cases included pupils with learning disabilities, mental health issues, epilepsy, autism, stammers, deafness and LGBTQ+.

Gifts and uncommon characteristics and/or when a child has a particular skill or talent can sometimes be rationalised as the result of possession or witchcraft. This can also be the case if the child is from a multiple or difficult pregnancy.

Complex family structures such as when a child living with extended family, non-biological parents, or foster parents can place them more at risk.

Signs and indicators

- physical injuries, such as bruises or burns (including historical injuries/scaring)
- a child reporting that they are or have been accused of being 'evil', and/or that they are having the 'devil beaten out of them'
- the child or family may use words such as 'kindoki', 'djin', 'juju' or 'voodoo' - all of which refer to spiritual beliefs
- a child becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other pupils

- a child's personal care deteriorating (e.g. rapid loss of weight, being hungry, being unkempt with dirty clothes)
- it may be evident that the child's parent or carer does not have a close bond with the child
- a child's attendance at school becomes irregular or there is a deterioration in a child's performance
- a child is taken out of a school altogether without another school place having been arranged
- wearing unusual jewellery/items or in possession of strange ornaments/scripts.

N Behavioural signs in children

Staff must be aware and recognise that all behaviour is communication.

If a child is being abused, neglected and/or exploited, their behaviour may change in a number of ways.

For example, (but not limited to) they may:

- behave aggressively to self/others or be disruptive, act out, demand attention and require more discipline than other children
- become angry or disinterested socially, and/or show little creativity/motivation
- seem frightened of certain staff or child
- present as sad, withdrawn, and/ or depressed
- have trouble sleeping/sleep for longer periods than the norm for them
- become sexually active at a young age
- exhibit inappropriate/advanced sexual knowledge for their age
- exhibit sexualised behaviour in their play or interactions with other children
- refuse to undress/change for gym/PE, and/or refuse to participate in physical activities
- develop dysfunctional eating
- self-harm and/or express suicidal ideation and/or attempt to end their life
- have changes in their attendance, refuse to attend school, go missing whilst in school, or run away from home/go missing in the community
- lack confidence or have low self-esteem; in some situations, will have raised confidence and esteem initially
- use drugs and/or alcohol as a coping strategy for anxiety/ new use of drugs/alcohol
- have unexplained gifts, money, and/or other items
- spend increasing time online, and become socially isolated
- have a new group of friends (potentially older)
- be seen to leave school with unknown peers/staff

O Behavioural signs in parents/carers (or other adults)

Please see **Part C-Process** for information relating to Low-Level Concerns, Self-Reports, Allegations, and Whistleblowing

Signs may include:

- placing unrealistic expectations on the child i.e. demanding a level of academic or physical performance of which the child is not capable
- offering conflicting or unconvincing explanations of any injuries to the child/behaviours of the child
- delaying seeking medical treatment for the child's mental/physical health (including not taking the child to a specialist medical practitioner immediately when a child discloses suicidal ideation in school)
- failing to meet the basic needs of the child in regard to clothing, housing, food etc
- having alcohol/drug dependency/unmanaged mental illness and refusing support
- appearing indifferent to, is emotionally unavailable, or overtly rejecting, the child
- denying the existence of or blaming the child for the child's behaviours at home or at school
- seeing and describing the child as entirely worthless, burdensome, or in another negative light
- refusing offers of support to meet the child's need(s)
- refusing to consent to referrals to external agencies to meet their child's needs/does not engage as expected.

P Grooming

Grooming is *the process* by which an individual prepares a child, significant staff, including staff, and the environment for abuse and/or exploitation of this child.

The perpetrator's motivation can be sexual, or increasingly financially related (see above section G).

Pupils and young people can be groomed online or in the real world, by a stranger or by someone they know, or someone pretending to be someone they know, including peers.

Groomers may be of any biological sex, gender identity and/or sexual orientation. They could be of any age, including another young person.

They may be located in the country where the child lives, or if online exploitation, could be resident anywhere in the world.

Modus operandi of grooming

Target vulnerable victim: Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs. This may happen over a number of months/years or may happen very quickly.

Gain victim's trust: Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the school in order to foster secrecy and intimacy.

Gain the trust of others: Institutional offenders are often popular with pupils and parents, and often staff, successfully grooming not only the victim but also other members of the victim's family and the school community at large.

Filling a need/becoming more important to the child: This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.

Isolating the child: The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members. This may involve the offender making themselves the only/main point of contact in school for the child.

Sexualising the relationship: This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if staff, for example about marital problems or conflicts.

Maintaining control and secrecy: Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

Making threats: Offenders may threaten the child/their family/their friends/their pet with harm if they tell/do not continue with the abuse.

Blackmailing: Offenders may blackmail their victim, for example, by saying that they will share any intimate images/videos of the child, including those which are AI generated, with friends and family.

Creating opportunity: Offenders will gradually seek to create the time and opportunity to allow for the grooming process to occur, and the eventual abuse of the child (ren). This behaviour may involve the offender creating situations where they have access more easily, in unstructured scenarios and/or encouraging the pupils, and occasionally the parent/carer unwittingly to do so.

Signs of grooming manifested by sex offenders (paedophiles)

It is important to remember that not all sex offenders will exhibit the signs listed below and if an individual exhibits some or all of these signs, it does not mean that they are a sex offender:

- Being overly affectionate with a child
- Affording special attention or preferential treatment to a child (ren)

- Gravitating towards a specific sex of pupil or year group
- Creating and/or spending excessive time alone with a child outside of the classroom/school
- Frequently spending time with a child in private or isolated areas in the school
- Transporting a child to or from the school
- Making friends with a child's parents and visiting their home socially
- Offering to provide a particular child additional educational support
- Acting as a particular child's confidante
- Giving small gifts, money, toys, cards, letters to a child
- Using texts, telephone calls, e-mails, messaging apps, and/or social networking sites to inappropriately communicate with a child
- Exhibiting flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child
- Making inappropriate and/or suggestive remarks about pupils to other staff

Signs and indicators that a child may be being groomed

Many pupils and young people do not understand that they are being/have been groomed, or that what has happened is abuse and/or exploitation. The signs that a child is being groomed are not always obvious. Groomers will also go to great lengths not to be identified.

Pupils may:

- be very secretive, including what they are doing online
- spend lots, much more, or much less time online, texting, gaming or using social media
- are withdrawn, upset or outraged after using the internet or texting
- are secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.
- have more than one phone
- be in a relationship with an older child offline/online (or perceive themselves to be with an older child)
- go to unusual places to meet friends; not disclose who they are meeting, or give false accounts of who they are meeting
- have new things such as clothes, money or mobile phones that they can't or won't explain
- have increasing or new access to drugs and alcohol
- be late for school, go missing from home or school; or are increasingly likely to be absent from school without adequate explanation
- display behavioural changes; these can be both negative and positive
- have sexual health issues

- attempt suicide, express suicidal ideation and/or self-harm (including dysfunctional eating and/or excessive exercise)
- express indicators that they are anxious and/or depressed
- have low self-esteem (or occasionally high self-esteem in earlier stages of grooming)
- steal items or money/sell theirs or others' items for money

In older pupils, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age.

Q Radicalisation

For more information, please see the Preventing Extremism and Radicalisation Policy.

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

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

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

Children can be vulnerable to the influences of extremism which could lead to radicalisation. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology and/or radicalisation. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). Increasingly the preferred pathway for those wishing to radicalise others is by online methods.

It is possible to protect pupils from extremist ideology and intervene to prevent those at risk of radicalisation from being drawn into terrorism. As with other safeguarding risks, staff should be alert to changes in pupils' behaviour, which could indicate that they may be in need of help or protection.

Staff should use their judgement in identifying pupils who might be susceptible and at risk of radicalisation and act proportionately which may include the CPC making a referral to the authorities.

Signs and Indicators

There are no known definitive indicators that a young person is susceptible or vulnerable to radicalisation, but there are a number of signs that t*ogethe*r increase their risk of being groomed in this way.

These include, but are not limited to:

- Under/over achievement changes
- Being in possession/sharing extremist literature
- Poverty
- Social exclusion/isolation and need for belonging
- Traumatic events – current and/or historical in earlier childhood
- Global or national events (may or may not involve any personal link/association with a particular country)
- Religious conversion/changes in practice and/or belief structure
- Change in behaviour (verbal, physical, emotional, social)
- Exploitation of some form
- Extremist influences
- Conflict with family over lifestyle
- Confused identity/sense of self
- Victim or witness to race or hate crimes
- Rejection by peers, family, social groups
- Having confirmed or emerging indicators of SEND

R Adverse Childhood Experiences

An Adverse Childhood Experience (ACE) is a stressful event in childhood (note: a child is up to 18 years) that can have a lasting impact on mental health, behaviour, and education throughout childhood, adolescence and into adulthood. An ACE can mean that a child has already been a victim of abuse, neglect, and/or exploitation, or growing up in a household in which alcohol or substance misuse, mental ill health, domestic violence and/or criminal behaviour are present. ACEs can affect brain development, increase the risk of chronic health conditions, mental illness, and substance abuse in adulthood. Recognising and preventing ACEs is therefore crucial for promoting child well-being and reducing the long-term impact of these experiences.

S Mental Health

Please see Part 3 Process for more information in relation to managing situations involving mental health.

Mental Health is defined as a 'state of wellbeing in which every individual recognises his or her potential, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to his or her own community' (World Health Organisation).

Positive mental health is important to build strong, resilient and proactive pupils. We know that some pupils will encounter some level of challenge in life, but for many pupils, they will face adversity, with some experiencing trauma or abuse (see above) which may impact on their mental health. For many young people, adolescence is particularly a time of stress, whilst for others transitioning through the school years can also be problematic.

For those pupils who may begin to struggle with their mental health, a school intervention may provide a turning point in their lives, may mitigate the issues that are negatively impacting on their mental health, and ultimately may prevent mental ill health in adulthood.

It is important to note that there have been many changes in the kinds of pressures and difficulties that pupils now encounter to what has gone before. What seems apparent, however, is that there has never been a time when pupils have needed our support more in terms of their mental health.

Contributing factors

There are various contributing factors to the rise in mental health issues, the most common being:

- lack of family support and unrealistic parental expectations
- peer relationship problems and bullying
- feeling unhappy about appearance
- pressures around drugs and alcohol
- excessive screen time
- excessive dieting/exercise
- quarrelling with parents, the breakdown of the family unit and parental conflict

Vulnerabilities

Certain groups of pupils may be more vulnerable to having poor mental health, and we also know that there are certain risk factors that could increase their likelihood of having poor mental health. Therefore, it seems logical that these types of pupils and young people may be most likely to display emerging indicators, and subsequently they could be more easily identifiable.

Research suggests that pupils' vulnerabilities can be categorised into nine broad categories:

1. Children receiving statutory support including those in care
2. Children known to have experienced abuse, neglect and/ or exploitation
3. Children with a disability or ill-health or developmental difficulties
4. Children in households characterised by poverty or domestic abuse
5. Children who are vulnerable by virtue due to their nationality
6. Children who are vulnerable by virtue of their identity e.g. LGBTQ+ and/or questioning their gender
7. Children at risk in relation to activity or institutions outside of the home e.g. gangs or radicalisation

8. Children caring for others e.g. their parents due to illness
9. Children with medical conditions

Our approach

The school will have a whole school approach to mental health and wellbeing. This means that we:

- have a culture and environment that promotes positive mental health and wellbeing to prevent the onset of mental illness
- raise awareness of emotional wellbeing and mental health issues, and reduce stigma
- ensure that all school staff know every child in the round, including their physical/mental health
- observe pupils and identify early those who may be experiencing physical/mental health problems or be at risk of developing one
- upskill staff so they can respond to pupils' physical/mental health needs should they arise
- implement both early targeted support and school-wide interventions to help pupils build resilience
- liaise with and refer pupils to specialist services where needed
- make sure that pupils and their parents/carers are aware of, and able to access, a range of mental health interventions
- are committed to child and parent participation in decision making
- deliver high quality teaching to pupils around mental health and wellbeing

Mental Health and Safeguarding

There is a logical link between safeguarding and mental health. It is the responsibility of **all staff** to recognize when a child shows signs of distress or presents with mental health concerns which need the intervention of the CPC within their safeguarding capacity.

Whilst only appropriately and medically trained professionals should attempt to make a diagnosis; all staff are well placed to observe pupils day-to-day and identify those whose behaviour suggests that they may be experiencing deteriorating mental health and/or emerging need. Our staff understand that the 'contextual safeguarding model' and knowing about the 'bigger picture' of pupils' lives including their family circumstances, will help them identify any social, emotional, and mental health needs.

<u>Self-harm</u>

What is self-harm?

Self-harm 'describes any way in which a young person might harm themselves or put themselves at risk, in order to cope with difficult thoughts, feelings or experiences (Source: No Harm Done 2017). The clinical definition of self-harm also includes attempted suicide, though some argue that self-

harm only includes actions which are not intended to be fatal. Some people who self-harm may be suicidal, but it is widely accepted that self-harm is often used as a way of managing difficult emotion without it being a suicide attempt. However self-harming can result in accidental death, so every episode must be taken seriously to avoid escalation or fatality.

Why do pupils self-harm?

- To manage extreme emotional upset
- To reduce tension
- To provide a feeling of physical pain to distract form the emotional pain
- To express emotions such as hurt, anger or frustration
- As a form of escape
- As an effort to regain control over feelings or problems
- As an attempt to punish themselves or others
- To elicit care from others
- To identify with a peer group

How do pupils self-harm?

- Self-cutting, scratching, scraping or picking skin
- Swallowing inedible objects, hazardous materials or substances
- Taking an overdose of non-prescription or prescription drugs
- Hitting or banging head or other parts of body
- Intentionally taking too little or too much medication
- Burning or scalding
- Hair pulling
- Hanging
- Suffocation or self-strangulation
- Scouring or scrubbing excessively
- Self-poisoning
- Use of illegal drugs and excessive amounts of alcohol.

Staff or parents/carers may also notice in the child:

- Changes in eating/sleeping habits
- Increased isolation from friends, becoming socially withdrawn
- Changes in activity and mood
- Lowering of academic achievement
- Talking or joking about self-harm and suicide
- Abusing drugs or alcohol

- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing e.g. always wearing long sleeves
- Unwillingness to participate in certain events e.g. swimming
- Increased time spent online

T Children who may have specific vulnerabilities

Essential points

Some children are potentially at greater risk of harm and early help and support is required.

Whilst all children should be protected, it is important that staff recognise that some groups of children are potentially at greater risk of harm (including online harm), especially those with protected characteristics.

This policy will now consider 9 specific groups of children who may have increased vulnerability.

1. Children with additional learning needs and/or disabilities and/or medical/physical health conditions
2. Children who are, or perceived by others to be LGBTQ+
3. Children who are questioning their gender or perceived by others to be
4. Children who have a family member in prison
5. Children who have involvement within the court system
6. Children who are absent from education and children missing education
7. Children who have a Social Worker
8. Children who cannot be looked after by their parents
9. Children who live in a home environment where there is domestic abuse (see above section B)
10. Children requiring mental health support (see above Part 2: Section S)
11. Children who are young carers

1 Children with additional learning needs and/or disabilities, and/or medical/physical health conditions

Children with additional learning needs and/or disabilities, and/or certain medical/physical health conditions* can face additional safeguarding challenges, and are statistically more vulnerable to child abuse, including child-on-child abuse. Additional barriers can exist when recognising abuse and neglect in this group of children. These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

- that these children can potentially be disproportionately impacted and more prone to peer group isolation, or bullying than other children (including prejudiced based bullying) without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges which creates a risk that they do not understand the difference between fact and fiction in online content and then repeat the content/behaviours in school or the consequences of doing so.

Any safeguarding concerns, including reports of abuse around this group of pupils will usually require the CPC to liaise with the Learning Support/SENCO (and school nurse where appropriate). Extra pastoral support may be needed for these pupils, along with ensuring that any appropriate support for communication is in place.

*A child having a medical/physical health condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk. In the event of a clinical incident taking place, the school nurse/equivalent, in conjunction with the CPC, should consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident. A safeguarding referral would only be needed where an incident highlighted concern that the pupil 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. This might occur where relevant information about a pupil person's medical condition is not provided to the school, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

2 Children who are lesbian, gay, or bisexual/other in sexual orientation

A child or young person being lesbian, gay, or bisexual (or other) is not in itself an inherent risk factor for harm, however, they can be more vulnerable to discriminatory bullying targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (or other) in sexual orientation (whether they are or not) can be just as vulnerable as children who are.

Whether a child be identifying or perceived to be lesbian, gay or bisexual (or other) any risks can be compounded where children lack trusted staff with whom they can be open. The school will take proactive steps to prevent all bullying (including putting appropriate sanctions in place) and support those at increased risk. Our school is an inclusive environment where all children belong, and all children are encouraged to seek support when, and if, they require this. It is therefore vital that our staff endeavour to reduce the additional barriers faced by these potentially vulnerable groups of pupils and maintain a culture where children can speak out or share their concerns with members of staff.

In Spain, Law 2/2006, of 3 May, on Education states schools must **promote** equality and non-discrimination at all levels, without distinction based on sexual orientation or identity. In addition, it advocates for schools to establish rules and plans for coexistence (Plan de Convivencia) to prevent gender-based violence and harassment on the grounds of gender, identity or sexual orientation. . In summary, the law seeks to promote inclusive education that shapes citizens who are free from prejudice and respectful of diversity.

Law 4/2023, of 28 February, on real and effective equality for transgender people and guaranteeing the rights of LGTBI people is national legislation in force throughout Sain; however, certain nuances will exist within each autonomous community and their regional legislation.

3 Children who are questioning their gender

Introduction

In recent years, there has been a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their biological sex, and the related ways they fit into society.

It is common for children to engage in activities that are less typically associated with their sex. For example, at primary school age, girls may play with trucks, or boys may dress in clothes that are perceived as feminine. Sometimes young children also go through a period of questioning their gender but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

The school will take the necessary time to understand the thoughts and feelings of any pupils who are questioning their gender and staff should be appropriately professionally curious about the full range of the pupil's experiences. Staff should remain aware of the potential vulnerabilities of pupils who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

That said, it is not for schools to take action in this area (KCSIE).

Legislation

In making decisions about supporting social transition, the school must comply with the distinct but interacting obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination* is informed by their evaluation of the welfare and best interests of the pupil and the other pupils.

*Schools must ensure that they do not discriminate against pupils with the protected characteristic of gender reassignment when taking decisions in this area. Some pupils who are questioning their gender may not have the protected characteristic of gender reassignment. In practice, it may be very

difficult for a school to determine whether a pupil questioning their gender has this protected characteristic or not.

Recording

All decision making around any individual pupil who is questioning their gender must be recorded (this would usually be on their ECMS). Recordings must include the pupil and parent/carer's voice in terms of wishes and feelings.

Decisions

Decisions must be made in line with the following principles:

1 Schools have duties to safeguard and promote the welfare of all children

The school will consider how best to fulfil their duties towards a pupil who is questioning their gender, as well as their peers, ensuring that any agreed course of action takes account of the impact on all of those affected. This means that the first step when considering a pupil's/parent's request for support with social transition will be to consider what is in the best interests of the pupil and other pupils, and a decision relating to social transition may not be the same as a pupil's wishes. The school will work with parents/carers to determine what is in the best interests of their child as well as considering any clinical evidence or advice and seeking any additional non-clinical professional advice where relevant (for example the Learning Support Lead/SENCO), including involving the CPC. The school will consider everything that could be affecting a pupil, including whether they have any wider health issues or neurodiversity. In considering the best interests of pupils, the school will take into account the principle of taking 'a careful approach' (see below point 3).

2 Parents/carers should be actively involved and their views treated with importance

Parents/carers have the leading role in the lives of their children, and this area should be no exception. Therefore, where a pupil who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority and treat their views with importance.

Outcomes for children and adolescents are best if they have a supportive relationship with their families and, in the vast majority of cases, the school will work together with parent/carers to establish what is best for the pupil. Involving a pupil's parents/carers will enable the school to promote a pupil's wellbeing and protect them from harm.

The school will explore how best to support these conversations, including offering a staff member to be present or to speak to parents/carers on the pupil's behalf. However, in the rare circumstances where involving parents/carers would constitute a greater risk to the pupil than not involving them, the school will involve their CPC to determine what action is needed to safeguard the pupil, before

the parents/carers are contacted or any decisions are taken. This may involve contacting social services.

The advice above applies in cases where a pupil has requested support with social transition. In cases where a pupil confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, there is no reason to break any confidence unless there is a related safeguarding risk.

3 Accommodating social transition is an active intervention so schools must take a very careful approach

Schools must take a very careful approach in relation to social transition. There is a lack of good evidence on the long-term impact of social transition on young people, but it is clear that social transition should be viewed as an active intervention that may have significant effects on the child or young person in terms of their psychological functioning and longer-term outcomes. Primary schools should exercise particular caution, and support for full social transition to be agreed very rarely. Older children will generally have greater agency to make their own decisions. Maintaining flexibility and keeping children's options open will help to avoid a child feeling they are under pressure to commit to a potentially irrevocable pathway when they are young. Parent/carers will be signposted to their family doctor as the first step.

4 Discussing constraints

Where the school's policy has the potential to place a pupil who is questioning their gender at a disadvantage (and other pupils, including those who are also questioning their gender), the school will balance the impact of agreeing the pupil's request against the impact of refusing their request, taking into account all the relevant factors. This will include taking into account the school judgment about whether supporting social transition is in the pupil's best interests and the best interests of other pupils, as above. The school will explain to the parents/carers any constraints.

When discussing requests with pupils and their parents/carers, the school will take time to sensitively explain that supporting any degree of social transition will not include allowing access to toilets, changing rooms or residential accommodation (i.e. on educational visits/trips) designated for the opposite sex, and will not include allowing children to join PE classes designated for the opposite sex where there are safety reasons for single-sex PE.

The school will also make sure that pupils and their families are aware that while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, the school must also be conscious of the rights of pupils and staff in relation to their religion or belief. However, schools supporting social transition will consider discussing options with pupils and staff such as using names instead of pronouns.

5 Reviews

The circumstances and/or needs of a pupil may change over time. For example, it may become known that there are safeguarding issues that were not previously apparent (including where a pupil is 'living in stealth') , or that a decision has placed an unsustainable pressure on a school's resources. In such cases, the school may need to review their original decision taking into account the factors set out above, including involving the pupil's parents/carers. In deciding whether to review a decision, the school will involve their CPC.

As well as revisiting decisions at appropriate points, the school will need to consider whether previous decisions taken remain appropriate, taking into account the impact of making any changes on the pupil in question and considering the principle above about involving parents/carers.

6 Correct information

Having the correct information about a pupil is important in the context of schools fulfilling their safeguarding duties, and they should make sure all relevant staff are aware of a pupil's biological sex in all cases.

Schools are legally required to record a pupil's biological sex accurately.

7 Pupils 'living in stealth'

The school will be particularly conscious of the vulnerabilities of pupils who have fully socially transitioned from an early age but may be 'living in stealth' (i.e. the school, friends/staff may be unaware of the pupil's biological sex). The school encourages parent/carers to be open about such cases so their child can be fully supported.

8 Support for pupils who wish to detransition

There may be circumstances where a pupil wants to fully or partially reverse a request that has previously been agreed. It is important to maintain flexibility and keep options open for children who have socially transitioned and recommended that support should be provided to children who wish to de-transition. If this situation arises, the school will work closely with the pupil and their parents/carers (and relevant experts as needed) to ensure that pupils in this position are supported.

Teaching pupils around gender

The school will be mindful that beyond the facts and the law about biological sex and gender reassignment there is significant debate, and they should be careful not to endorse any particular

view or teach it as fact. For example, they will not teach as fact that all people have a gender identity. The schools will avoid language and activities which repeat or enforce gender stereotypes and will be mindful to avoid any suggestion that social transition is a simple solution to feelings of distress or discomfort.

4 Children with family members in prison

Schools should be aware and provide additional support if they have any pupils or young people on their roll whose parent or close family member is moving through criminal proceedings, and/or in prison. Approximately 70,000 pupils in Spain are separated from a parent currently in prison.

Many pupils with a parent in prison go on to lead positive and fulfilling lives. However, a range of research shows that this group of vulnerable pupils are more likely to have poorer outcomes, including, but not limited to poverty, stigma, isolation, homelessness and mental health problems. Crucially they are more likely to become involved in crime, be absent (or excluded) from school, and to experience drug and alcohol misuse.

5 Children involved in the court system

Criminal courts

Pupils are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. As guidance, there are two age-appropriate guides to support pupils **5-11-year olds** and **12-17 year olds**. The guides explain each step of the process, support and special measures that are available.

Family Courts

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be extremely stressful for children caught up in proceedings, and in the most complex situations, cause significant emotional abuse to the child when they are exposed to parental conflict that is frequent, intense and unresolved (see above). In these situations (after speaking to both parents about the situation and the impact on their child) a referral to social services may be made.

Court Orders

Where pupils are involved in the above family courts, the school has a duty to support any court order granted and cannot become involved in individual discussions with parents around court decisions around collections/residence. It is the parents' responsibility to adhere to the directions in any court order; therefore, it will be themselves who potentially breach it. Those with Parental

Responsibility must seek permission from the courts to disclose any variation to orders with the school.

6 Children Absent from Education and Children Missing Education

Please see our Child Absent in Education, Children Missing Education and Attendance Policy for more information.

It is mandatory for all pupils of statutory school age to attend school every day that the school is open. All staff should be aware that pupils who are absent from education for unexplainable, and/or prolonged periods and/or on repeat occasions, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation. It may indicate mental health difficulties, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation and/or risk of forced marriage.

It is important that the school's response to unexplainable, prolonged and/or persistently absent pupils 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 first emerge. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child being absent from school or going missing in future

Where pupils are already known to external agencies, where being absent from education may increase known safeguarding risks within the family or in the community, or where there is prolonged absence and/or unexplained absence for any child, the school will request that the parents/carers facilitate regular visibility of the child remotely, over MS Teams.

Where the parents/carers do not comply with this request, the school must adhere to their guidance from their relevant local authorities. Staff should, therefore, be aware of their school's unauthorised absence and their relevant local authorities' 'pupils missing/absent from education' procedures.

Children Missing Education are children who

- are in the process of applying for a school place
- have been offered a school place for a future date but have not yet started
- are receiving elective home education (EHE) that has been assessed as unsuitable

have been recorded as CME for an extended period, for example where their whereabouts is unclear or unknown

Children Missing Education are not those who are registered at a school, even if they are persistently or severely absent from that school.

Elective Home Education

Home education is not regulated in Spain.

The Education Act 2006 covers compulsory schooling in state-approved centres only. However, the Spanish constitution recognizes the fundamental right of parents to decide the education they want for their pupils in accordance with their own convictions and values, according to Article 27.3

Where a parent/carer has expressed their intention to remove their child from school with a view to educating them at home, the school will coordinate a meeting with parents/carers to explore why they are considering this option. Schools will explore keeping the child in school whilst respecting parental choice.

If the parents continue with their wish to home educate their child, the school will seek guidance from their local education inspectorate.

7 Children who have a Social Worker

Children may need a Social Worker (local authority children's services) due to safeguarding or welfare needs (see below). Children may need this help due to abuse, neglect, and/or exploitation 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 positive mental health.

8 Children who cannot be looked after by their parents

This policy will explore the following scenarios:

A. Kinship care, including children who are being privately fostered

B. Children who are looked after (or previously looked after)

C. Children who are staying with host families

A Kinship care, including children who are being privately fostered

Kinship care is when a child lives full-time or most of the time with a relative, friend or connected person and that person provides most or all of the child's care. It does not include parents, foster carers with no prior

connection to the child, or anyone caring in a professional capacity.

Kinship care arrangements can be formal (through legal orders or kinship fostering) or informal (family or friends caring without a formal agreement in place).

The following are all types of kinship care arrangements however this list is not exhaustive:

a) informal kinship arrangements (no approved foster care) such as a private family arrangement in which a close family member who does not hold parental responsibility raises the child

a) A private fostering arrangement in which someone who is not a close relative of the child looks after the child
b) Where a court order has been granted in respect of the child, in favour of someone who is a friend or family member but is not the child's parent.
c) Where a special guardianship order has been granted appointing a friend or family member as the child's special guardian.
d) Where an adoption order has been granted in respect of the child and, prior to the making of the order, the adopter was a friend or family member.

Private fostering

Private fostering is when a child or young person is looked by someone who is not a close relative, legal guardian, or person with parental responsibility.

It is not private fostering if the child is 'looked after' by the Local Authority (see above -also known as 'in foster care' and which includes placement in residential care, with an approved foster carer or a 'kinship' carer).

Examples of private fostering situations include:

- children and young people living apart from their families for a variety of reasons e.g. a parent is ill, has had to temporarily move for work, or there has been conflict, separation or divorce;
- children whose parents work or study elsewhere or overseas;
- children sent to this country by their parents for education and health care;
- young people living with the family of a friend; and
- children on holiday exchanges

B Children who are Looked After and Previously Looked After Children

The most common reason for pupils becoming looked after is as a result of abuse, neglect, and/or exploitation. A child who is being 'looked after' by the authorities is usually known as a 'Child in Care' or a 'Looked After Child.' They might be living with foster parents or at home with their parents under an order granted to Social Services, or in residential pupils' homes, or other residential settings like schools or secure units.

A child who is adopted is not a Looked After Child. Occasionally, in rare circumstances, pupils are placed into foster care under an order when an adoption breaks down and the adoptive parents relinquish the child. Once a definitive order is agreed, the child remains on long term foster care. The previously adoptive parents may or may not have continued contact with the child, depending on the situation and the emotional impact on the child.

As a result of their experiences both before and during care, Looked After Pupils are at greater risk than their peers; they are, for example, four times more likely than their peers to have a mental health difficulty. Providing a secure, caring environment in school and enabling such pupils to develop strong, trusting and stable relationships with professionals is critical to their immediate and longer-term safety and wellbeing. A previously looked after child (whether in care temporarily or longer term into adoption) also potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after pupils safe. When dealing with looked after pupils and previously looked after pupils, it is important that all agencies work together and prompt action is taken when necessary to safeguard these pupils, who are a particularly vulnerable group.

Cognita ensures that the necessary staff receive appropriate and proportionate training relating to specific cases of Looked After Pupils, including on the reasons pupils become looked after, their legal status, the support that staff can provide to keep such pupils safe and the ways in which they can maximise educational stability for Looked After Pupils.

The Child Protection and Wellbeing Coordinator (a) is responsible for ensuring that any looked after pupils are adequately supported by staff in school; (b) has contact details of the child's social worker; (c) ensures that relevant staff members have sufficient information about the child's looked after legal status and care arrangements; (d) works with the relevant authorities to discuss how staff can best support the progress of Looked After Pupils in the school and meet the child's educational needs; and (e) attends any meetings they are required to attend.

Guardianship (*tutela*).

Guardianship is a legal term denoting someone who is appointed by a court order to be a legal guardian of a minor. Typically, if a biological parent is deemed by the courts to be unable to take care of the minor, all of the rights and privileges of a biological parent are transferred to the appointed guardian. Guardianship is different than adoption and is typically temporary. During a guardianship, however, parents can sometimes retain some rights including limited contact with the child. Guardians are overseen by courts, unlike adoptive parents.

C Pupils who are staying with host families

<u>When might this happen?</u>

Schools often make arrangements for pupils to take part in exchange visits, either to other parts of the country or abroad. Exchanges can benefit learning across a range of subjects. Foreign visits can

enrich the languages curriculum and provide exciting opportunities for pupils to develop their confidence and expertise in the use of other languages.

What is the responsibility of the school?

Schools have a duty to safeguard and promote pupils' welfare as outlined in this policy. This extends to considering their safety and how best to minimise any risk of harm to those pupils during any exchange visit the school arranges, and when organising for the care and accommodation of a child with a host family (known as homestays) as part of the exchange.

Suitability of staff in host families for homestay arranged by the school

When arranging a homestay, schools should consider the suitability of the staff in the respective families who will be responsible for the visiting child during the stay.

Private arrangements

Where the child's parent(s) or a student arranges their own homestay themselves, this would be a private arrangement, therefore the school would not be the regulated activity provider. Where it is a private arrangement, the school is not entitled to obtain a police check.

Background checking for staff in homestay arrangements

When a school arranges a homestay, it should consider what intelligence/information will best inform its assessment of the suitability of the staff in those families who will be responsible for the visiting child during the stay. It will be for the school to use their professional judgement to decide what it considers will be most relevant. However, to help inform that assessment, schools should obtain, as a minimum, a police check such as the *certificado de delitos sexuales.*

Suitability of staff in host families abroad

It is not possible for schools to obtain criminal information about staff who provide homestays abroad. Schools should liaise with partner 'host' schools abroad, to establish a shared understanding of, and agreement to, the arrangements in place for the visit. They should use their professional judgement to satisfy themselves that the arrangements are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. Parents must be aware and provide written confirmation of any agreed arrangement. Schools are free to decide whether they consider it necessary to contact the relevant foreign embassy or the High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the country.

The school must produce a written risk assessment outlining the approach taken and indicating the reasons for specific decisions. This must include any safeguarding considerations, and individual risk assessments must be created for all vulnerable pupils (those with a safeguarding (including mental health), SEND, and/or medical need)

During the visit

Pupils must be made aware and understand who to contact during a homestay should an emergency occur, or a situation arises which makes them feel uncomfortable.

Additional action for pupils from outside the UK in extended UK homestays

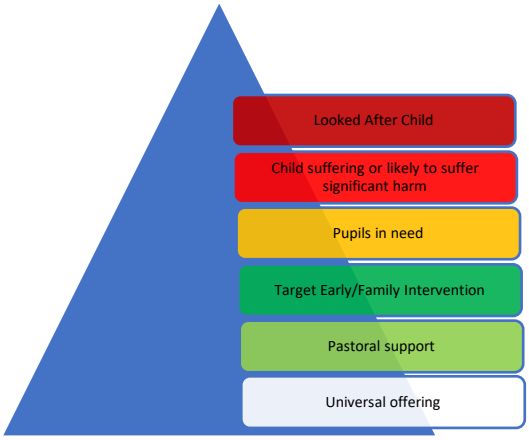
If a child from outside the UK is staying in the UK in a homestay arrangement for 28 days or more, for a child aged under 16 years of age (under 18 years of age if the child has disabilities), this may amount to Private Fostering under the Pupils Act (1989) (see above). In these cases, the school must notify the local authority of the arrangements. Private fostering legislation places a duty on local authorities to satisfy themselves that the welfare of a child who is being, or proposed to be, privately fostered in their area is being or will be satisfactorily safeguarded and promoted. By notifying the local authority, the school will be assisting the local authority in discharging its duty.

9 Children who live in an environment where there is domestic abuse and/or controlling behaviours , and CAPVA (Child and Adolescent to Parent Violence and Abuse) (see section B)

U Stages of Safeguarding

The school can use a range of arrangements, depending on the information available and the risk of harm posed to the pupil. The school will always work cooperatively with external agencies, including the local authority and the Police.

The diagram opposite outlines the hierarchy of these approaches.



Introduction

All families can face challenges that make parenting difficult. Often families are able to overcome challenge themselves or with the help of relatives, friends, and services, such as schools, youth services, health visiting and mental health services as well as local agency support available.

However, sometimes families will have more significant needs that require more intensive help and support.

Early Intervention refers to support for children of all ages that improves a family's resilience and outcomes and/or reduces the chance of a problem getting worse, and subsequently the risk of harm escalating. Providing early help is more effective in promoting the welfare of children than reacting later when the needs of the child are affecting their health and/or development, or when harm has already occurred and/or there is the likelihood of harm. Whatever their circumstances, pupils and families should not be left waiting to access help and support when issues arise.

Universal

Universal services is the term used for support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local agencies working together and taking collective responsibility to provide the right provision in their area.

This level of support is provided through "universal services" such as education, health, and other community-based services.

Targeted Early/Family Intervention

Targeted Early/Family Intervention falls under the overall definition of safeguarding.

Early intervention is support for children of all ages that improves a family's resilience and outcomes and/or reduces the chance of a problem getting worse, and subsequently the risk of harm escalating. Providing early help is more effective in promoting the welfare of children than reacting later when the needs of the child are affecting their health and/or development, or when harm has already occurred and/or there is the likelihood of harm. Whatever their circumstances, pupils and families should not be left waiting to access help and support when issues arise.

In line with managing situations/unmet need internally, the school may decide that the child(ren) involved do not require referral to external services but may benefit from early help/intervention.

If targeted early/Family intervention is felt appropriate for the family, the CPC or DCPC will discuss this with the parents/carers of the pupil, explaining what this support is, and what happens next. The parents/carers must consent to this service as it is voluntary. If a family does not consent to Family Help, the school should seek to understand why this is the case, so that they can provide reassurance to the family about their concerns. They should ensure the family has understood the consensual nature of support, and range of services available to meet their needs. The school should consider how the needs of the pupil could otherwise be met, for example, through provision by universal services that the family already engages with.

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

For more information about this school's early intervention local processes, please contact the CPC.

Many forms of early intervention to pupils and families can also be offered via signposting parents/carers of pupils to helpful local organisations.

Early interventions can also occur within school.

All cases at the Early Intervention stage must be kept under constant review and consideration given to a referral to Social Services for assessment for statutory services if the child's situation does not appear to be improving or is getting worse, and/or the parents/carers are not engaged with the support recommended to meet their child's unmet need.

Any child may benefit from early intervention, but all school staff should be particularly alert to the *potential* need for early intervention for any child who:

- is disabled and has certain medical/health conditions and/or specific additional needs;
- has special educational needs
- has an emerging mental health need/diagnosis
- has been bereaved
- has an ongoing or chronic physical illness
- is a young carer
- is pregnant and/or is a parent themselves
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is involved in the court system; criminal or family court
- is persistently absent from school
- is on a part time timetable
- is frequently missing/goes missing from care or from home
- has repeatedly been removed from the classroom, received multiple suspensions, is on a part time timetable and/or is at risk of being permanently excluded from school
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking, and/ or exploitation including group-based exploitation
- is at risk of so called 'honour'-based abuse including Female Genital Mutilation (FGM) and/or Forced Marriage (FM)
- is at risk from being radicalised into terrorism
- is at risk from faith/belief-based abuse

- is in a family circumstance presenting challenges for the child/other, such as drug/alcohol misuse/addiction, unmanaged mental health problems, teenage relationship abuse and/or domestic abuse including coercive or controlling behaviour, and CAPVA
- is experiencing parental conflict, which is frequent, intense and unresolved
- has returned home to their family from 'looked after' care
- is newly adopted or being cared for permanently by a family member other than their biological parents
- has a parent/significant other going through the criminal court system/serving a custodial sentence in prison, or is affected by parental offending
- is showing early signs of being at risk from abuse, exploitation, and/or neglect (including group-based)
- has exhibited early signs of abusive, violent and/or harmful behaviours towards others
- is at risk from threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, with staff being aware that there may be an overlap that can occur between online harm and harm experienced in person
- is showing signs of becoming addicted to gaming/gambling
- is a privately fostered child with staff being aware that they may need to support both parents and kinship carers at the same time
- is LGBTQ+ or is perceived to identify as LGBTQ+
- is questioning their gender or is perceived to be questioning their gender.

In addition, staff must:

- be aware of and able to identify where a pregnant person might need help or support to provide safe and suitable care for their unborn child well
- be aware of new and emerging technologies (such as artificial intelligence) and the role that online platforms, including gaming and social media platforms, can play in grooming children and facilitating and/or causing harm
- be aware that a pupil and their family may be experiencing multiple needs at the same time
- recognise how trauma, racism, discrimination, and past experiences with services affect relationships and adapt practice, accordingly, respecting the importance of different cultural models of parenting and family life.

This is not an exhaustive list and there may be many other factors or situations that could mean that a child may require early help or intervention, or their family will benefit from support to prevent concerns escalating.

Escalation of service

All cases at the early intervention stage must be kept under constant review and consideration given to a referral to social services if the pupil's situation does not appear to be improving or is getting

worse, and/or the parents/carers are not engaged with the support recommended to meet their child's unmet need

Pupils who have a Social Worker

Pupils may need a Social Worker due to safeguarding or welfare needs. Pupils may need this help due to abuse, neglect, and/or exploitation 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 positive mental health.

Local authorities should share with schools the fact a child has a Social Worker. However, it is more than likely that thy the school will have been involved in any assessment leading to the child being made subject to a statutory 'plan'.

The CPC/DCPC in their absence must attend all coordination meetings. Where pupils have an allocated Social Worker, this should inform school decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by external services). Any new information or safeguarding concern that the school has about any child with an action plan must and will be shared with the child's allocated Social Worker (or their Team Manager in their absence).

Children in Need

As guidance, a Child in Need is defined under the LO 1/1996, 15 January, regarding minors' legal protection as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

The school will seek support from external agencies such as Social Services, health services, mental health support services for the purposes of safeguarding and promoting their welfare.

Children suffering or likely to suffer significant harm

Authorities, with the help of other organisations as appropriate have a duty to make enquires under section 18 of the LO 1/1996, 15 January, regarding minors' legal protection if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect domestic abuse (including controlling or coercive behaviour), teenage relationship abuse, trafficking, online abuse, female genital mutilation or other so-called honour-based abuse, and extra-familial threats like the influences of extremism which could lead to radicalisation, and sexual/criminal/financial exploitation. . Should an investigation occur, then the school's involvement and any action may be determined on the advice given by the investigating agency.

Actual or likely significant harm should be assessed through an anti-racist, anti-discriminatory and culturally aware framework, applying knowledge of faith, beliefs and family cultures that can positively and negatively impact on children, whilst maintaining a core focus on the safety and wellbeing of the child involved.

V Contextual Safeguarding and Extra Familial Harm

All staff should be aware that pupils can be at risk of harm inside and outside of the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of pupils who may be in need of help or protection.

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, neglect and/or exploitation.

Parents and carers can often have (or feel that they have) little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Staff should consider the importance of understanding intra familial harms and any necessary support for siblings following incidents of child-on-child abuse, including sexual harassment and/or violence.

The contextual safeguarding approach says that pupils' social care practitioners, child protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse *beyond their front doors*. This also includes the risk of abuse, neglect and/or exploitation occurring in or outside of school.

Extra-familial Harm

While there is no legal definition for the term extra-familial harm, it is widely used to describe different forms of harm that occur in contexts outside of their home. Children may be at risk of or experiencing physical, sexual, or emotional abuse and exploitation. Contexts can include peer groups, school, and community/public spaces, including known places in the community where there are concerns about risks to children (for example, parks, housing estates, shopping centres, takeaway restaurants, or transport hubs), as well as online, including social media or gaming platforms.

Children can be vulnerable to multiple forms of extra-familial harm from both adults and/or other children and harm may be perpetrated or facilitated by individuals or groups.

Examples of extra-familial harm may include (but are not limited to):

- criminal exploitation (such financial exploitation),
- serious harassment and/or violence,
- modern slavery and human trafficking,
- online harms,
- sexual exploitation (including group-based child sexual exploitation),
- serious youth violence including the use/threat of weapons
- child-on-child abuse (non- familial)
- sexual abuse and other forms of harmful sexual behaviour displayed by children towards their peers
- domestic abuse, controlling coercive control, including stalking
- abuse in their own intimate relationships (sometimes called teenage relationship abuse), including physical, sexual, emotional abuse and stalking
- the influences of extremism which could lead to radicalisation.

Modern Slavery

Modern slavery is a complex crime and may involve multiple forms of exploitation. It encompasses:

- human trafficking
- slavery, servitude, and forced or compulsory labour

An individual could have been a victim of human trafficking and/or slavery, servitude, and forced or compulsory labour. Victims may not be aware that they are being trafficked or exploited, and may have consented, without having given informed consent, to elements of their exploitation, or accepted their situation.

If a staff member has concerns that a child may be a potential victim of modern slavery or human trafficking (including through child criminal exploitation and/or child sexual exploitation) then they must use the school procedure in the first instance, ensuring that the pupil's medical and emotional needs are addressed as the priority. A referral must be made by the Safeguarding team to the Police.

W Signposting to further information

Annex A of KCSIE contains further guidance and resources on a range of specific safeguarding issues, some of which are above.

This section must be read by all staff that work directly with pupils and those with governance oversight for the school.

- Child abduction and community safety incidents
- Children and the court system
- Children who are absent from education and/or missing from education
- Children with family members in prison
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- Modern Slavery
- Cybercrime
- Domestic abuse
- Homelessness
- Honour-based abuse
- FGM
- Forced Marriage
- Preventing radicalisation
- Child on child abuse
- Sexual Violence

Part 3: Process

Contents

A. Reporting and recording in relation to pupils
B. Reporting and recording in relation to staff (not parents/carers) including:

1. Expectations of staff conduct
2. Low-Level concerns
3. Self-Reports
4. Allegations

C. Whistleblowing
D. Managing situations involving child on child abuse
E. Managing situations involving self-generated intimate imagery/videos, (nudes and semi-nudes) including those that are AI generated
F. semi nudes/nude imagery
G. Managing situations involving PSB, HSB, Sexual Harassment and/or Sexual Violence
H. Managing situations involving mental health
I. Visiting speakers
J. Lettings for individuals and organisations

A Reporting and recording in relation to pupils

Contents

1. What to do if you have a concern about a child
2. What to do if a child makes a disclosure
3. Actions following a concern/disclosure
4. Making referrals
5. Inter-agency working
6. Confidentiality
7. Photos
8. Record-keeping
9. Passing on records

1 What to do if you have concerns about a pupil

All staff should know what to do if they have concerns about a child's welfare or when pupils or staff raise concerns about a child to them.

Staff should understand the difficulties pupils may have in approaching them and the need to build trusted relationships.

All staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, neglected and/or exploited, and/or they may not be able to recognise their experiences as harmful.

Staff should be aware that the first approach/disclosure from a child may not be the only incident that has happened. It is appropriate therefore, to ask the child whether something like this has ever happened to them before.

If staff have a concern about a pupil but are not sure if this amounts to a safeguarding concern, they must speak to the CPC/DCPC on the same day. There must be no delay.

Where staff have a concern which they are confident amounts to a safeguarding concern, they will be able to upload their concern directly onto the ECMS used in the school. The CPC/DCPC will discuss the concern with the staff member who has raised it and then make the necessary decisions that are required.

In more serious situations, where a pupil has made a disclosure that suggests they have been harmed (by themselves, another pupil/child, or by an adult (including staff)) or are likely to be harmed, staff must report this verbally and immediately to the CPC/DCPC. Please see below for further information around disclosures.

In the absence/unavailability of the CPC/DCPC; schools should contact the RSL as needed, and/or the local authority children's social services.

Informing Parents/Carers of concerns

Parents/carers must always be informed of all concerns raised about their child on the same day, unless to do so would place the child at increased risk. At a suitable point, once risk has been assessed, the parents/carer will be informed, after advice and direction has been received from the authorities.

Where parents are no longer together i.e. separated or divorced, information about the concern must be shared with both parents so that the school remain impartial (unless to do so may raise the risk for the child and/ or one of the parents e.g. in a case where there is serious acrimony or domestic abuse).

2 What to do if a child makes a disclosure

Staff must know how to respond should a child make a safeguarding disclosure to them.

The points below support all staff in a situation where a child tells them that they know about or have been a victim of abuse, neglect, and/or exploitation. They also apply to when a child discloses

that they have self-harmed/have suicidal ideation/have made an attempt to end their life, whether in school or not.

- Listen carefully and allow the child to speak freely and remain calm.
- Try not to interrupt the child or be afraid of silences.
- Recognise that there are many barriers to a child making a disclosure.
- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me".
- Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing".
- Do not question the child about what they are saying extensively, as partner agencies will lead any investigation.
- Seek a context around what the child has said.
- Limit questioning to the minimum necessary for clarification using What, When, How and Where. Avoid leading questions such as, "Has this happened to your siblings?"
- Do not use questions beginning with Why as this can apportion feelings of guilt within a child.
- If the child discloses abuse, neglect, and/or exploitation, it is appropriate to ask whether any other staff/pupils were present and observed/involved in what happened, and whether anything like this has happened before
- Staff should summarise for the child what they have said as the conversation continues when there are natural breaks, or at the end, to ensure that they have heard and understood the information accurately, mirroring back to the child their own words and descriptions, occasionally stopping to check.
- At an appropriate time in the conversation, the staff member will tell the child that the matter will be passed onto to those that need to keep them safe in confidence, always using language that is appropriate to the age and stage of development of the child, allowing for their individual need.
- Take the child directly to the CPC/DCPC, or if not immediately available, ensure that the child is supervised until emotionally stable.
- If the child has disclosed abuse and also spoken about physical pain and/ or physical discomfort, medical intervention must happen immediately whilst the CPC/DCPC makes a referral. No photos must ever be taken of injuries (see below) and staff must be mindful of removing any forensic evidence.
- then tell the child that the school needs to keep them safe and what will happen next i.e. they will go with you to see the CPC/DCPC in their absence. The CPC/DCPC must be available immediately should a disclosure of abuse, harm etc be made by a pupil. If this is not possible, a staff member should contact the RSL.

3 Actions following a concern/disclosure

Following notification of a concern/disclosure, the CPC and the safeguarding team will consider the necessary course of action to support the child.

The case management process includes, but is not limited to:

- Information gathering
- Information sharing (within the Safeguarding team)
- Identifying and assessing the level of need and support to address the concern
- Identifying who in the school has the responsibility to take decisions on need and support
- Recording the rationale for all decisions taken
- Identifying who will inform the parents/carers of the concern, after risk assessing
- Identifying who will deliver the support to the child
- Recording, monitoring, and evaluating interventions for the child
- Creating Safeguarding Risk Assessments where needed
- Undertaking Case Reviews every 6 weeks
- Liaising with other agencies as required

4 Making referrals

If a child is thought to be at risk of harm

If a child is at risk of harm, a referral must be made to Social Services immediately. If it is assessed that a criminal offence has occurred, or they/a parent may be imminent danger the school should first contact the Police, followed by Social Services. Whilst any member of staff can and should know how to make a referral to the authorities, our policy is that any referral will be done by the CPC or DCPC. However, there must be no delay.

Depending on who obtained the initial disclosure i.e. if a member of teaching staff first receives a disclosure or has a concern, the CPC/DCPC may also need to speak to the child, either to corroborate the child's account or to gain further context, prior to making any referral, to aid the authorities in their decision making.

The school does not require parental consent for referrals to be made to external agencies (Art. 15 LOPIVI). Consent to do this must not be obtained from the parents if to gain consent would put the child's safety at risk (for example in situations where physical/sexual abuse by a parent/family member has been clearly disclosed by a child) or to do so could jeopardise any investigation by partner agencies.

The school should ask the leading agency whether and when the referral (and concerns) can be shared with the child's parents/carers of the child when making a referral where seeking consent is a safeguarding element of the situation.

The CPC/DCPC must inform their Headteacher/Head of School and the Regional Safeguarding Lead (RSL) of all referrals to authorities.

Mental Health

If the pupil has expressed any suicidal ideation when they disclosed their abuse, they must be 100% supervised by appropriate staff until support can be put in place, and referrals made. If to follow normal processes i.e. informing the pupil's parents/carers of their ideation and asking them to collect their child would heighten risk to the pupil/other, then the pupil must be supervised until such time that statutory agencies e.g. social services/police have made their initial decisions.

If a child is not at risk of harm but has unmet needs

When a child is not considered at risk of harm but still has unmet needs that is impacting or likely to impact on their health and development, a referral should be made to social services.

The school does not require parental consent for referrals to be made to external agencies; however, it is best practice in these situations where risk is not present for any referral to be made transparently with the parent's/carer's knowledge.

5. Inter-agency working

The CPC and Deputy CPCs liaise and work in partnership with all agencies in the best interests of pupils in the school.

6 Confidentiality

Whilst is always important to take into consideration pupils' wishes and feelings, staff must never guarantee confidentiality to them as this may not be in their best interests. They should let the child know that they will pass on information in confidence only to the people who must be told to ensure their safety (Safeguarding Team members).

7 Photos of abuse/injury

If a child discloses physical abuse, self-harms, and/ or attempts to take their life, staff must never take photos of their injuries.

On exceedingly rare occasions, a member of the safeguarding team may be directed by the authorities (Police/Social Services only) to take a photo of a child's abuse injury and send it to them for their assessment of risk. Should this occur, the authorities must be asked to put their request in writing and the CPC should seek advice from the RSL.

The staff member must use a school device (only) to take photos, and they must have a witness present when doing so.

They must never take intimate photos of any genital or chest area.

Images must be sent securely and then deleted from school device as soon as the authorities confirm receipt of the images. A record must be made as soon as possible who has asked this task to be done noting their role and contact details.

8 Record-Keeping

Why is recording important?

Research has shown the dangers of failing to take effective action. Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect
- poor record keeping
- failing to listen to the views of the child
- failing to re-assess concerns when situations do not improve
- not sharing information with the right people within and between agencies
- sharing information too slowly, and
- a lack of challenge to those who appear not to be taking action.

Having clear safeguarding records also help if/when responding to any parental complaints about the way a case has been handled by the school.

Managing safeguarding records in our school

All safeguarding-related records including online are kept in a secure location with restricted access/permissions. These are on the school's ECMS.

All concerns, discussion and decisions made, and the reasons for these decisions, must be recorded on the ECMS, for each pupil involved in any situation.

In principle, records must include, but not be limited to:

- a clear and comprehensive summary of the concern and/or disclosure including context
- details of how the concern/disclosure was initially followed up by the safeguarding team i.e. note of the immediate action (s) taken, decisions reached (see above), and school interventions (including referrals to agencies). Outcomes must always be recorded.
- confirmation that all those with parental responsibility for the child have directly been informed of the concern/disclosure (unless to do so would heighten risk at that time to the child/others).

- the eventual outcome in terms of whether the unmet need was met/harm addressed and /or reduced (this will usually occur later).

In cases where a child has disclosed harm or likelihood of harm, staff must:

- as stated above, prior to writing up their record, **immediately** discuss the concerns **verbally** with the CPC, so that immediate action can be taken. If the CPC is not available then this should not delay appropriate action being taken and staff should speak to the DCPC, Headteacher or failing that the RSL
- make a written record of any conversation with the child as soon as possible, using school systems
- use the specific words that the child used when they disclosed (e.g. if referring to parts of their body), indicating these words by using “speech marks/inverted commas”.

The Safeguarding team are responsible for making decisions on next steps and actions following any disclosure or reported concern. All discussions and decisions made, and the reasons/rationale for those decisions being made (AND for others **not** being made), must be recorded in writing by the CPC/DCPC throughout the child’s safeguarding record.

Further actions, meetings, and decisions may be required after the initial concern has been raised.

For all disclosures, it is likely that there will more recording required, and a lengthy period of intervention.

9 Passing on safeguarding records when a child leaves the school

Information sharing is vital in identifying and tackling all forms of abuse, neglect and/or exploitation. 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 pupils. School staff should be proactive in sharing information internally within the school, with Cognita, and with local authorities, as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of pupils, whether this is when problems are first emerging, or where a child is already known to the local authority pupils’ social care. This includes the sharing of information without parental consent where there is good reason to do so, i.e., the risk of harm to the child will be increased.

However, data protection legislation in Spain means that we must consider information sharing with other third parties e.g., with a new school, on a case-by-case basis, in conjunction with the Group Data Protection Team / Group Legal Team.

B Reporting and recording concerns about an adult (not parents)

Contents

1. Expectations of staff conduct
2. Low-Level concerns
3. Self-Reports
4. Allegations

1 Expectations of staff

All references in this section to “staff” should be interpreted as meaning any adult, staff members, agency/supply staff, self-employed, contractors, volunteers and visitors, unless otherwise stated.

The safety and wellbeing of pupils in our school is dependent on the vigilance of all our staff. Their prompt communication to the CPC, DCPC or Head of School of any concerns, no matter how small, regarding the conduct by an adult in the school which causes them to doubt that adult’s suitability to work with or have access to pupils is paramount.

As a result of their knowledge, position and/or the authority invested in their role, all staff working with pupils are in positions of trust in relation to the pupils in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable pupils. All members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. A position of trust could arise even if the member of staff does not teach the child. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch any child in a sexual way or have a sexual relationship with any child.

The notification and prompt handling of all concerns about staff, including those raised by individuals about themselves (see below for Self-Reports), is fundamental to safeguarding pupils.

All staff must behave responsibly and professionally in all dealings with pupils and must always follow the procedures set out in our ‘Staff Code of Conduct.’ Adults must be clear about what appropriate behaviour is and be confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and/or others. Adults should always avoid behaviour which might be misinterpreted by others.

Those raising concerns or reporting allegations in good faith will always be supported. Staff in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

It is essential that all staff know the differences between Self Reporting, Low-Level Concerns, Allegations and Whistleblowing, and know how to report any concerns. They should also be familiar with the Complaints Policy so that they can direct parents/carers to the Headteacher as required.

2. Low-Level Concerns

What is a Low-Level Concern?

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 another adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff Code of Conduct/other Cognita policy (including inappropriate conduct outside of work), and
- does not meet the threshold to be an **Allegation** (see below) and/or
- is otherwise not considered serious enough to consider a referral to the authorities.

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

- being over friendly with pupils or having favourites
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door (whether on /off site)
- using inappropriate, humiliating, belittling, critical, offensive, sexualised, or intimidating behaviour / language (including shouting, being verbally aggressive, and/or saying words that could impact on their wellbeing)

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is intended to enable abuse.

Why do we have a Low-Level Concern procedure?

The overarching aim of the school's Low Level Concern procedure is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored and reinforced by all staff. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately is critical. If implemented this should:

- identify any weaknesses in the school safeguarding systems
- identify, prevent, and minimise the risk of abuse occurring
- protect adults against misunderstandings or misinterpretations
- encourage openness, trust, and transparency
- enable the school to identify inappropriate, problematic, or concerning behaviour early

- ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school

In particular, the intention of this procedure is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines
- ensure that staff feel empowered to raise any low-level concern about a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct or other Cognita policy and
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

What do you have to do if you have a Low-Level Concern?

Low-Level Concerns may arise in several ways and from a number of sources. For example, suspicion, complaint or disclosure from a pupil, parent, or other adult within or outside of the school, or as a result of vetting checks undertaken.

Where a Low-Level Concern (including self-reports) exists, it must be recorded in writing **using the relevant form** and shared with the CPC or the Headteacher **only,** as soon as reasonably possible, on the same day as the incident (where the concern relates to a particular incident).). This record includes the details of the concern, the context in which the concern arose, and once received, the action taken by the Headteacher/Principal/CPC.

How is the Low-Level Concern is dealt with?

When the CPC/Headteacher/Principal receives the report, they must inform the other in a timely fashion (within the day). If the CPC and Headteacher/Principal are unavailable, the staff member with the concern should contact their RSL. There must be no delay.

Where a Low-Level Concern relates to a person employed by a supply agency or a contractor to work in the school, that concern should also be shared with the CPC and/or Headteacher/Principal. Their employer will be notified about the concern by the CPC/Headteacher/Principal, so that any potential patterns of inappropriate behaviour can be identified.

The Headteacher/Principal is the ultimate decision maker in respect of all Low-Level Concerns; however, it is safe and best practice that they consult with the CPC and take a more collaborative decision-making approach.

The CPC and Headteacher/Principal will discuss all low-level concerns they receive on the same day as the concern was raised. The Headteacher, in collaboration with the CPC, will, in the first instance, satisfy themselves that it is a Low-Level Concern and should not be reclassified as an **Allegation** and dealt with under the appropriate 'allegations' procedure (outlined later in this document).

The circumstances in which a Low-Level Concern might be reclassified as an allegation are where:

a) the threshold is met for an allegation
b) there is a pattern of low-level concerns which *collectively* amount to an allegation or
c) there is other information which, when considered, leads to an allegation.

If there is any doubt about the Allegations threshold, the CPC/Headteacher/Principal will seek advice from the RSL immediately. There must be no delay.

Next steps

Having established that the concern **is** Low Level, the CPC or Headteacher/Principal, as appropriate, will first discuss it with the individual who has raised it to gather context and any further information. The person who has raised the Low-level Concern will remain anonymous to the subject of said concern, wherever possible.

The person to which the Low-Level Concern relates **must** be informed of any concern raised about them once all risk has been identified and assessed.

Staff witnesses may be interviewed as relevant, as will pupils with their parental consent. The DSL/Headteacher/Principal must seek the advice of the RSL/ERM Manager in the case of speaking to pupils as needed.

Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training, etc.

The CPC/Headteacher/Principal will seek advice from the RSL/HR team as needed around recommendations or actions for the adult.

Record keeping of Low-Level Concerns

Where a Low-Level Concern has been communicated, all associated documentation will be kept in a school central file which logs all low-level concerns A-Z according to staff member/adult surname; this file must only be accessible by the CPC and the Headteacher. Any rationale for any decisions made and actions taken, must be recorded on the Low-Level Concern form by the Headteacher/Principal/CPC. Minutes of all meetings with relevant adults/pupils must also be recorded and retained.

Records should be reviewed by the Headteacher/Principal so that potential patterns of inappropriate, problematic or concerning behaviour related to the adult can be identified. Where such a pattern is identified, the Headteacher/Principal will decide on a course of action for the individual.

Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur, and where appropriate procedures will be revised, or extra training provided to staff to minimise the risk of such behaviour happening again.

Retention When staff leave the school, any record of Low-Level Concerns which are stored about them will be kept for a period of ten years and, following this, reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

a) whether some or all the information contained within any record may have any likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records and practice; or
b) if, on balance, any record is not considered to have any value, still less actionable concern, and ought to be deleted accordingly.

Retention is necessary to see whether any patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the authorities.

No record will be made of the concern on the individual's personnel file unless either:

a) the concern (or group of concerns) has been reclassified as an allegation; or
b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure
c) the concern is determined to meet the threshold of an allegation when considered with any other low-level concerns that have previously been raised about the same individual.

Specifically, if a referral is made to external agencies where the behaviour in question:

i. had not originally been considered serious enough to consider a referral to the authorities but merited consulting with and seeking advice from them
ii. is determined to meet the threshold of an allegation when considered with any other Low-Level concerns that have previously been raised about the same individual

Records relating to the behaviour will be placed and retained on the staff member's personnel file, whilst **also** being retained on the school central low-level concerns file.

References

Low Level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a Low-Level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the allegations threshold for referral to the authorities and found to be substantiated, it should be referred to in a reference.

Summary:

Low- Level Concerns about an adult

From time to time, an individual may notice behaviour, statements, or actions in others which leave them concerned.

These are behaviours or actions which fall short of a formal **allegation** of abuse.

These tend to be behaviours which indicate that our Code of Conduct

may not have been met.

Any such concerns can be dealt with as a Low-Level Concern.

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

- being over friendly with pupils and/or having favourites
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door (on/off site)
- using inappropriate, offensive, belittling, humiliating, critical, sexualised, or intimidating behaviour / language (including shouting, being verbally aggressive, and/or saying words that could impact on their wellbeing)

What to do if you have a Low-Level Concern?

Where a Low-Level Concern exists, it must be reported to the

CPC or Headteacher/Principal (only)

as soon as reasonably possible on the same day.

They will confer on whether the LLC meets allegation threshold or not

and take appropriate actions.

They must reach out to the RSL/HR team as required.

3. Self - Reports

What is a Self-Report ?

A Self-Report also falls under our Low-Level Concerns procedure. From time to time, an adult may find **themselves** in a situation which might appear compromising others, or which could be misconstrued.

Equally, they may, for whatever reason, have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct/other Cognita policy, falls below the expected professional standards, or breaches this policy.

Self-Reporting by staff in these circumstances is encouraged. This demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived.

As such, the school sees Self-Reporting as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

What do you have to do if you have a Self-Report?

A Self-Report must be reported in writing **using the relevant form** to the CPC or to the Headteacher/Principal (only) as soon as reasonably possible, on the same day as the incident (where the concern relates to a particular incident).

How is the Self-Report dealt with?

When the CPC/Headteacher/Principal receives the report, they must inform the other in a timely fashion (within the day). If the CPC and Headteacher/Principal are unavailable, the staff member raising the self-report should contact their RSL/HR department. There must be no delay.

Record keeping

Where a Self-Report has been raised by an individual about themselves, a confidential record will be kept in a school central file which logs all self-reports A-Z according to staff member surname; this file must only be accessible by the CPC and the Headteacher/Principal.

Review

Records should be reviewed by the Headteacher/Principal so that potential patterns of inappropriate, problematic or concerning behaviour related to the adult can be identified. Where such a pattern is identified, the Headteacher/Principal/Principal will decide on a course of action for the individual.

Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur, and where appropriate procedures will be revised, or extra training provided to staff to minimise the risk of such behaviour happening again.

4 Allegations

The purpose of this section of the policy is to outline how allegations against staff will be handled.

What is an allegation?

Allegations represent situations that might indicate an adult may/would pose a risk of harm to pupils if they continue to work in regular or close contact with pupils in their present position or in any capacity.

This policy applies to all staff in the school- regardless of whether the school is where the alleged incident or pattern of behaviour took place- if it is alleged that they have met one of the following four statements, often referred to as 'harm tests':

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or pupils in a way that indicates he or she may pose a risk of harm to pupils
- behaved or may have behaved in a way that indicates they may not be suitable to work with pupils
- (this includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children; this is known as transferable risk and an assessment of this risk will be undertaken,

An allegation may be triggered by:

1. **one** specific incident
2. a pattern of behaviours and Low-Level concerns which, **when considered collectively**, amount to an allegation

Allegations against a teacher who is no longer teaching must be referred to the relevant Police authorities.

Non-recent (i.e. historical) allegations of abuse must also be referred to the same.

What to do if you want to report an Allegation?

An allegation may be triggered by one specific incident or by a pattern of behaviour by the adult OR a Low-Level Concern which, when considered **collectively** with other LLCs, amount to an Allegation

If you want to report an allegation about any adult who works on the school site:

↓

Report to the Headteacher/Principal (only) **immediately**

without informing the adult whom the concern is about

If you want to report an allegation about the Headteacher/Principal:

↓

Refer to the MD, RSL and Head HR (only) **immediately**

without informing the Headteacher/Principal

Who does this procedure apply to?

This policy applies to members of staff, trainee teachers, contractors, visitors, and volunteers who are currently working in any school, regardless of whether the school is where the alleged abuse took place.

Supply/Agency Staff/Hirers of school premises

This policy also refers to agency staff/supply staff/hirers of school premises (KCSIE) (see below). In some circumstances, schools will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business. Whilst schools are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a

school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the authorities to determine a suitable outcome.

Decisions will need to be made in discussion with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation. Agencies should be fully involved and co-operate in any enquiries.

Non-recent allegations

Where an *adult* makes a non-recent allegation via the school that they were abused in as a child by a current member of staff, the individual should be advised to report the allegation to the Police. The Headteacher/Principal must contact the RSL, HR and the MD as a priority.

Where an *adult* makes a non-recent allegation via the school that they were abused as a child by a former member of staff, the individual should similarly be advised to report the allegation to the Police. The Headteacher/Principal must contact the RSL, HR and the MD as a priority.

Non recent allegations against current /former staff made by a current *child* must be reported to the authorities in line with the local authority's procedures for dealing with non-recent allegations.

Abuse can be reported no matter how long ago it happened.

Dealing with an allegation

The procedures for dealing with allegations need to be applied with common sense and judgement, and be dealt with quickly, fairly and consistently.

Many cases may well either not meet the criteria set out above or may do so without warranting consideration of either a Police investigation or enquiries by local authority Social Services.

However, some allegations will be so serious they require immediate intervention by Social Services and/or the Police. These are situations where a pupil has been harmed, that there may be an immediate risk of harm to a child, or if the situation is an emergency.

There must be no delay.

There are two aspects to consider when an allegation is made:

1. Looking after the welfare of the pupil
2. Investigating and supporting the adult subject to the allegation

Initial Enquiries

Headteachers/Principals, after first liaising with the RSL, HR (ER Manager/Head of HR, MD(known as 'the group'), *may* need to gather some initial information to help them determine whether there is any foundation to the allegation before contacting the local authorities (this will be Social Services and/or Police/Ministerio Fiscal as appropriate).

For example, whether:

- the individual and/or pupil was in the school at the time of the allegation
- the individual did, or could have come into contact with the pupil
- there were any witnesses
- there is any relevant CCTV footage

Schools should ensure they understand the local authority's arrangements for managing allegations, including the contact details and what information the authorities will require when an allegation is made. Before contacting the authorities, and after liaising with the group, schools should conduct these basic enquiries to establish the facts, being careful not to jeopardise any future Police investigation.

When to inform the individual of the allegation should be considered carefully on a case-by-case basis, with guidance as required from the 'group', and if appropriate local authorities. Unless agreed, the person to which the allegation has been made must not be informed or interviewed at this stage, so as not to jeopardise potential evidence gathering by external agencies.

Outcomes after initial enquiries

If, after the initial gathering of information it is decided by the above group of colleagues that the concerns **do not** meet threshold for an allegation (and therefore no contact with the authorities is required), but they are a concern around **conduct**, the Headteacher/Principal will be supported by HR in the steps thereafter, with the RSL supporting as needed.

If, after the initial information gathering stage, it is decided that the concerns **do** amount to a Safeguarding allegation that **does** meet threshold for contacting the authorities (at least for advice about whether a referral is needed), the Headteacher/Principal will do so (or the CPC in their absence or delegation), and will be supported by the RSL, and HR colleagues in steps thereafter.

A Case Manager will be appointed in the school; this is likely to be the Headteacher/Principal or the CPC, or in some cases the Head of School/DCPC. In very serious and complex cases, or where there is a conflict of interests, the RSL will be the Case Manager.

Informing Parents/Carers

Parents or carers of the child or pupil/s involved will be told about the allegation by the Case Manager as soon as possible if they do not already know of it. The Case Manager will seek advice from the group about when and how this communication will happen.

However, where a 'strategy discussion' is required (see below), or the authorities need to be involved, the case manager will not inform the parents of the allegation until those authorities have been consulted and have agreed what information can be disclosed to the parents or carers.

Parents or carers will also be kept informed of the progress of the case, only in relation to their own child, no information can be shared regarding the staff member due to data protection legislation.

Parents and carers will also be made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers whilst investigations are ongoing. If parents or carers wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, Social Services, or the Police as appropriate, will consider what support the child or pupils involved may need.

Initial Discussion with the authorities

The purpose of an initial discussion is for the authorities and the case manager (school initially-Headteacher/Principal/CPC) to consider the nature, content and context of the allegation and agree to a course of action. The authorities may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the individual's current contact with pupils.

There may be situations when the Case Manager will want to involve the Police immediately, for example if the person is deemed to be an immediate risk to pupils or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the authorities in order to help determine whether Police involvement is necessary.

The Case Manager should then consider with the authorities what action should follow both in respect of the individual and those who made the initial allegation.

Decisions

No further action

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it should be recorded by both the case manager and the authorities and agreement reached on what information should be put in writing to the individual concerned and by whom.

Further internal action

Situations can arise where the authorities are contacted, but advises that, whilst the matter does/does not reach threshold for a referral to them, it should be managed internally as a conduct issue, and internal investigation will usually be undertaken. In these situations, the Headteacher/Principal will be supported by HR, with the RSL supporting as needed.

Inter-agency meetings

Where a referral to the authorities **has** met threshold, and where there is cause to suspect a child is suffering or is likely to suffer significant harm, a 'strategy discussion' may be convened by the authorities.

If the allegation is about physical contact, the 'strategy discussion' or initial evaluation with the Police will take into account that teachers and other school staff can lawfully make physical contact but only use restrictive interventions, including the use of reasonable force in circumstances where there is a risk of danger/harm to a pupil/staff (see Use of Reasonable Force, Screening, Searching and Confiscation Policy).

Where a 'strategy discussion' is needed, or Police and/or Social Services need to be involved, the case manager (school) will **not** inform the accused person until those agencies have been consulted and have agreed what information can be disclosed to the accused, and what action has been decided.

Where it is clear that an investigation by the Police or Social Services is unnecessary, or the 'strategy discussion' or initial evaluation decides that is the case, the authorities will discuss the next steps with the case manager. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to an internal school-based investigation (see below),

According to the Public Prosecution order L.O. 10/2005 of 6 October 2005 regarding how to deal with school abuse, the intervention of the *Ministerio Fiscal* should be on a subsidiary basis understanding that if the application of the school measures is enough to deal with the case, the *Ministerio Fiscal* should not intervene. Notwithstanding, and as a general rule, the *Ministerio Fiscal* has to intervene in cases of severe abuse and/or minor abuse but repeated over time.

Internal school investigations

In some cases, whilst an investigation by the Police or Social Services is unnecessary, the school will be guided by the agencies so that further enquiries will be needed to enable a decision about how to proceed. If so, the authorities will discuss with the case manager how and by whom the school investigation will be undertaken. Their role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out by the school. In straightforward cases, an internal school investigation will normally be undertaken by a senior member of school staff such as the CPC. Where necessary, due to lack of resources or conflict of interest, the investigation may be undertaken by a senior leader from another Cognita school. Should the nature of the allegation be very complex, the allegation will require the RSL to investigate/ appoint an independent investigator. Any independent investigator will be appointed by HR in conjunction with the MD and RSL.

Where a safeguarding concern or allegation triggers another procedure, such as grievance or disciplinary, that procedure shall only be followed once the immediate safeguarding concern or allegation has been fully investigated.

Risk Assessment

Suspension of an employee

Cognita will consider carefully whether the circumstances of a case warrant a person being suspended from contact with pupils at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension will be considered prior to taking that step.

The possible risk of harm to pupils posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases, this will require the case manager to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported: all options to avoid suspension should be considered prior to taking that step.

If the case manager is concerned about the welfare of other pupils in the community or the member of staff's family, those concerns should be reported to the authorities as required. However, suspension is highly unlikely to be justified on the basis of such concerns alone.

Suspension will be considered only in a case where there is cause to suspect a child or other pupils at the school are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the case manager will consider carefully whether the circumstances warrant suspension from contact with pupils at the school or until the allegation is resolved.

The case manager will also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension.

If the Police and Social Services have no objections to the member of staff continuing to work during the investigation, the case manager will aim to be as inventive as possible to avoid suspension.

Based on assessment of risk, the following alternatives will be considered by the case manager before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or pupils concerned
- providing an assistant to be present when the individual has contact with pupils;
- redeploying to alternative work in the school so the individual does not have unsupervised access to pupils
- moving the child or pupils to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative Cognita school

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager will consider the potential permanent professional reputational damage to employees

that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

Within Cognita, suspension requires the authorisation of the Director of HR/MD/GM. A conversation with the case manager, Head of HR/ER Manager and RSL will occur to reach a rounded decision about whether suspension is the correct course of action. If immediate suspension is considered necessary, the case manager must record the rationale and justification for such a course of action. This must also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation will be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. Cognita will make clear to the suspended employee where they can obtain support. The person will be informed at the point of their suspension who their named contact is within the organisation and will be given their contact details.

Where a 'strategy discussion' or initial evaluation concludes that there should be enquiries by Social Services and/or an investigation by the Police, the case manager should canvass Police and Pupils' Social Care services for views about whether the accused member of staff needs to be suspended from contact with pupils in order to inform the school consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision will be taken on a case-by-case basis having undertaken a risk assessment. Social Services or the Police cannot require the case manager to suspend a member of staff, although the case manager will give appropriate weight to their advice. The power to suspend is vested in Cognita as proprietor of the school.

Support for employees

The welfare of all pupils is paramount, and this will be the prime concern in terms of investigating an allegation against a person in a position of trust.

However, when an allegation or safeguarding concern is being investigated it may be a very stressful experience for the adult subject to the investigation, potentially for their family members, and any other staff involved as witnesses to any incident.

Cognita has a duty of care to their staff. Cognita will provide effective support for anyone facing an allegation, and/or other members of staff involved in the process as witnesses and will act to manage and minimise the stress inherent in the allegations process. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time, supports the person who is the subject of the allegation and any witnesses. Support for the accused individual is vital to fulfilling this duty. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the Social Services or the Police. The individual will be advised to contact their trade union representative, if they have one, or a colleague for this support.

The case manager will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual and/or witnesses. The accused adult will also be given access to an employee support service, provided by Cognita, and referred to occupational health by the HR department as needed.

Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Timescales

It is in everyone's interest to resolve cases as quickly as possible and ensure consistency with a fair and thorough investigation. All allegations will be investigated as a priority to avoid any delay. The time taken to investigate and resolve individual cases depends on a variety of factors, including the nature, seriousness, and complexity of the allegation.

For cases where it is clear immediately that the allegation is unsubstantiated or malicious, it is aimed that they will be resolved within one week. Any concerns about safeguarding will always be discussed with the authorities.

Confidentiality

When an allegation is made, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. It is not possible to publish any material that may lead to the identification of an employee in a school who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). These restrictions apply until the point that the accused person is charged with an offence, and it is publicly disclosed by the Judge whether the Authorities authorised the disclosure of information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions are disapplied with regard to staff if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so, or if a judge lifts restriction in response to a request to do so.

As for the above purposes, "publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public." This means that a parent who, for example, published details of the allegation on a social networking site, would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher and/or the pupil by members of the public).

Authorities will not normally provide any information to the press or media that might identify an individual who is under investigation.

The Case Manager will take advice from the Police and social services to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise.

Oversight and monitoring

The authorities, where involved, will provide advice and guidance to the case manager in addition to monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Police forces should also identify officers who will be responsible for:

- liaising with school and authorities (social services/ Ministerio Fiscal)
- taking part in the strategy discussion or initial evaluation
- subsequently reviewing the progress of those cases in which there is a police investigation; and
- sharing information on completion of the investigation or any prosecution.

If the 'strategy discussion' or initial assessment decides that a Police investigation is required, the Police should ideally also set a target date for reviewing the progress of the investigation and consulting the Ministerio Fiscal about whether to:

- charge the individual
- continue to investigate
- close the investigation

Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the meeting if the investigation continues.

Information sharing

In a 'strategy discussion' or the initial evaluation of the case, the agencies involved will share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the Police are involved, wherever possible, the employer will ask the Police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This will be done as their investigation proceeds and will enable the Police to share relevant information without delay at the conclusion of their investigation or any court case.

Social Services should adopt a similar procedure when making enquiries to determine whether the child or pupils named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

Following a criminal investigation or a prosecution

The Police should inform the case manager immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged. In those circumstances, the authorities should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the Police and/or Social Services should inform that decision. The options will depend on the circumstances of the case and the consideration will need to be given as to the result of the Police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Outcome of an allegation

The following definitions will be used when determining the outcome of allegation investigations (including internal investigations):

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

On conclusion of a case

The options open to the school depend on the nature and circumstances of the allegation(s) and the evidence and information available. This will range from taking no further action, informal action, to internal Disciplinary processes, or a decision not to use the person's services in the future.

Substantiated Allegations

If an allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, Cognita will refer the case to the authorities.

In the case of a member of the teaching staff at a school, the matter will be referred to the authorities to consider prohibiting the individual from teaching in relation to their professional misconduct.

Unsubstantiated allegations

If an allegation is determined to be unsubstantiated or malicious, the RSL may advise the Headteacher/Principal/CPC to choose to refer the matter to Social Services to determine whether the child concerned needs support services and/or may have been abused by someone else.

Malicious

If an allegation is shown to be deliberately invented or malicious, the Headteacher/Principal and proprietor will consider whether any disciplinary action is appropriate against the pupil or staff member who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a pupil.

Learning lessons

Throughout the handling of allegations and at the conclusion of a case in which an allegation is substantiated, the RSL and HoHR may review the circumstances of the case with the Case Manager to determine whether there are any improvements to be made to the school's safeguarding/HR procedures or practice to help prevent similar events in the future. This will include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether suspension was justified. Lessons will also be learnt from the use of suspension when the individual is subsequently reinstated.

For all other cases, where the allegation concluded to be either unfounded, false, malicious, or unsubstantiated, the Case Manager should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Returning to Work

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Headteacher/Principal together with Case Manager will consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The Headteacher/Principal together with Case Manager will also consider how the person's contact with the child or pupils who made the allegation can best be managed if they are still a pupil at the school. Likewise, those members of staff who have been witnesses during the processes must be supported.

Resignations and 'settlement agreements'

If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with Spanish Criminal Law.

If the accused person resigns or their services cease to be used and the criteria are met, it will not be appropriate to reach a settlement/compromise agreement

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of pupils, including any in which the person concerned refuses to cooperate with the process. Wherever possible, the accused will be given a full opportunity to answer the allegation and make representations about it. However, the process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated on the basis of all the information available, will continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

Record keeping and Retention

Details of allegations that are found to have been malicious or false will be removed from personnel records unless the individual gives their consent for the retention of the information.

However, for all other allegations,(substantiated, unfounded and unsubstantiated) it is important that the following is kept on file of the person accused:

- a clear and comprehensive summary of the allegation,
- details of how the allegation was followed up and resolved,
- and a note of any action taken and decisions reached, and the outcome substantiated, unfounded and unsubstantiated
- a copy provided to the person concerned, where agreed by the local authority children's Social Care/Police; and
- a declaration on whether the information will be referred to in any future reference

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where the authorities need to check information from the Police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

The record will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation, if that is longer.

On occasion, records may be needed when Police investigate non-recent sexual allegations brought about by former students/staff.

The record must therefore be **retained in full.**

References

Cases in which an allegation was proven to be **false, unfounded, unsubstantiated or malicious** will not be included in employer references.

A history of repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious will also not be included in any reference.

Substantiated safeguarding allegations that meet the harms threshold should be included in references. provided that the information is factual and does not include opinions.

C Whistleblowing

Please refer to the staff Whistleblowing Policy for more information.

Key Points

- Staff are encouraged to report to Cognita any suspected wrongdoing within our School or Cognita.
- Members of staff who raise genuine concerns under the Whistleblowing Policy will be supported, even if they turn out to be mistaken.
- Staff must not suffer any detrimental treatment (including dismissal, disciplinary action, threats, or other unfavourable treatment) as a result of raising a genuine concern.
- Staff should ordinarily report wrongdoing internally within Cognita. In most cases it will not be necessary to alert anyone externally.
- Reports made maliciously or in bad faith may lead to disciplinary action.
- Concerns raised under the Whistleblowing Policy are distinct from concerns or allegations about an adult's suitability to work with or have access to pupils.

All staff have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils. If a member of staff believes that best practice in this area is not being adhered to or that practice may put a pupil or pupils at risk, they should first attempt to resolve their concern at school level via their Headteacher.

If the staff member feels the situation has not been resolved, they are able to submit a report (anonymously or not) to the Whistleblowing channel https://cognitaspain.integrityline.com/

D Managing situations involving child-on-child abuse

In some situations, a child will make a direct disclosure of child-on-child abuse, or their peers may report something has occurred. Alternatively, a staff member may raise a concern having witnessed or been told about an incident by a child/parent.

Staff

If a member of staff thinks for whatever reason that a child(ren) may be at risk of abuse/exploitation from another child or young person, or a group of perpetrators, or that a child(ren) may be

abusing/exploiting others, the member of staff should report their concern **verbally** to the CPC **without delay** in accordance with this policy, recording their concern in writing after this.

Parents/carers

Parents/carers must be informed of all situations and referrals, unless to do so would heighten risk to the child/others.

Safeguarding Leads

The CPC will discuss the behaviour with the member of staff raising the concern and will in all situations, take any immediate steps to ensure the safety of the victim(s) or any other child(ren) including the perpetrator. Where the CPC considers or suspects that the behaviour might constitute abuse and/or exploitation, Social Services should be contacted immediately, and if a criminal act is thought to have occurred, also the Police. Any response should be decided in conjunction with Social Services and other relevant agencies who will direct and advise once a referral has been received and accepted and should investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other pupils.

Take steps to ensure the safety and wellbeing of any pupils affected

1. Whilst the school establishes the facts of the case and starts the process of liaising with Social Services and the Police, the alleged perpetrator(s) should be removed from any classes they share with the victim. NB: Consideration will be given to suspending the perpetrator at this point if for operational reasons, the pupils cannot be separated/the risk is too high for either the victim, the perpetrator or other pupils.

2. The school should also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate. These actions are in the best interests of all pupils involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).

3. The school should consider that the abuse may indicate wider safeguarding concerns for any of the pupils involved

4. Treat all pupils (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other pupils, they may also have considerable unmet needs and be at risk of harm themselves.

5. Take into account the complexity of child-on-child abuse and of pupils' experiences and consider the interplay between power, choice and consent. While pupils may appear to be making choices, if those choices are limited, they are not consenting

6. Take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it, attitudes underlying it and the support that may be needed if the perpetrator is at risk.

   Factors to consider include the risk the perpetrator(s) poses and will continue to pose to other pupils, their own unmet needs, the severity of the abuse and the causes of it.

Safeguarding Risk Assessments (Safety Plan)

A written Safeguarding Risk Assessment must be completed after the above initial practical steps are completed. This must be shared and co-constructed with the pupils involved, their parents and the safeguarding team. Any risk assessment must be regularly reviewed.

The risk and needs assessment (including for a report of PSB, HSB, Sexual Harassment and/or Sexual Violence) must consider for each child involved, whatever their role (victim/perpetrator):

- the victim, their individual needs, their protection and support
- whether there may have been other victims and/or perpetrators
- the alleged perpetrator(s) individual needs, their protection and support
- all the other pupils who have not been directly involved but whom may be at potential risk, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- the time and location of the incident, and any action required to make the location safer (see below)

Following the incident

Perpetrator(s)

When any investigation has been completed, disciplinary action i.e. sanctions, in line with the Behaviour Policy may be appropriate, including

a) to ensure that the perpetrator takes responsibility for and realises the seriousness of their behaviour
b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and
c) to ensure the safety and wellbeing of the victim and other pupils in the school.

Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other pupils in the school;

Victim

Provide on-going support to victim(s) including, but not limited to:

a) ensuring their immediate safety
b) responding promptly and appropriately to the abuse
c) assessing and addressing any unmet needs
d) following the procedures set out in this Safeguarding and Child Protection Policy (including where the child is in need of early/statutory intervention)
e) monitoring the child's wellbeing closely and ensuring that they receive on-going support from all relevant staff members within the school
f) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term

School community

The school should consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

E Managing situations involving the sharing of self-generated intimate imagery/videos, including those generated by AI (also referred to as sharing nudes/semi-nudes)

Staff must NEVER view or forward illegal images of a child.

Should they receive such, then they must notify the CPC immediately. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the Police for inspection and subsequent removal. This will be the decision of the Police.

When an incident involving the sharing self- generated intimate imagery/videos, including those generated by AI comes to a member of staff's attention:

- The incident must be referred to the CPC as soon as possible
- The CPC will follow the best practice procedures and guidance set out in this guidance
- There should be interviews with the pupils involved to gather further information (if appropriate, seek advice from the RSL/external agency)
- Parents/carers of each child should be informed at an early stage and involved in the process (including prior to any further sensitive interviews with their child) unless there is good reason

to believe that involving parents/carers would put the child at greater risk of harm and jeopardise any Police/Social Services enquiries
- At any point in the process, if there is a concern that a child has been significantly harmed or is at risk of significant harm, a referral must be made to Social Services and/or the Police immediately. In these situations, the parents/carers must be informed, unless to do so may heighten any risk to the child/others.

F Managing situations involving PSB, HSB, Sexual Violence and/or Sexual Harassment

All staff must be trained to manage a disclosure from a pupil around PSB, HSB, sexual violence and/or sexual harassment. They should seek advice and support from the CPC following any initial disclosure.

Any response to PSB, HSB, sexual harassment and/or sexual violence should fall within, and be consistent with, the school's wider approach to child-on-child abuse (see above) whether the concerns of child-on-child PSB, HSB, sexual violence and sexual harassment, including those that have happened outside of the school premises, and/or online.

It may be appropriate to make notes during the discussion with any victim involved (ideally a second member of staff will be present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made eventually (after immediate actions are taken) **only recording the facts** as the child presents them. Schools should be aware that notes of such reports could become part of an assessment by Social Services and/or part of a criminal investigation by the Police.

<u>The basic safeguarding principles in terms of actions are:</u>

- All behaviours on this continuum must be considered within the child protection context
- Responses should be proportionate and tailored on a case-by-case basis
- if a child discloses that they have been harmed, a referral must be made to Social Services
- if a child says something that could indicate they may be at imminent risk of harm, Social Services must be contacted immediately but also potentially the Police
- rape, assault by penetration and sexual assaults, and upskirting are all crimes and must be reported to the Police immediately, followed by Social Services
- when responding to incidents that involve self-generated imagery/videos (commonly referred to as nudes and semi nudes), including those generated by AI, the legality of the incident must be reviewed, whilst using a proportionate approach that considers the age, development, and circumstances of the pupils involved, as well as any elements of coercion, exploitation or vulnerability. If there is any doubt, then the RSL should be consulted/social services

- if a child expresses that they are feeling unwell or have an injury due to what has occurred to them, they should receive medical assistance. However, all staff must be mindful not to remove any forensic evidence (for sexual violence i.e. criminal acts, seek advice from the authorities prior to intervention)
- the needs and wishes of the victim pupil (s) should be paramount (along with protecting the pupil(s) in any response, and they should never be made to feel they are a problem/made to feel ashamed for making the report
- the age and developmental stage of the victim pupil (s)and perpetrator (s) must be considered
- parents/carers of the victim pupil must and will normally be informed of their child's disclosure at an early stage and subsequent referrals to external agencies, including seeking their consent where required (unless this would put the victim at greater risk).
- The school should not speak to the alleged perpetrator (or their parents/carers) in some situations unless the authorities have stated that this is allowed- this is because to interview a perpetrator where criminal offences may have occurred may jeopardise their enquiries
- any pupils who have witnessed the sexual violence may be traumatised and support must be offered
- written Safeguarding Risk Assessments (Safety Plans) must be put in place for both the victim and the perpetrator for all cases of PSB, HSB, Sexual Violence and/or Sexual Harassment and reviewed every 4 weeks (or more regularly as required). These must consider classroom-based risks vs recreational time risks plus other risks such as online and transportation related. They must also consider any risks associated with 'live' or pending educational visits which involve any pupil linked to the situation.
- sanctions/disciplinary processes involving the perpetrator can (and should be) be implemented on the 'balance of probabilities' in parallel with offering support. These can be undertaken whilst other investigations by the Police and /or local authority children's social services are ongoing (schools will seek agency advice about whether this would prejudice any investigation or any subsequent prosecution)
- schools must look out for potential patterns of concerning, problematic or inappropriate sexual behaviour in the school, and consider whether there are wider cultural issues that require targeted/whole school interventions

Managing Situations

There are four likely scenarios that schools will need to manage:

Note: local authority procedures will dictate exactly how reports should be managed.

1 Internally:

For example, for one-off incidents of PSB, HSB, sexual harassment (dependant on what has occurred, and whether there have been any previous incidents), the school may take the view that

the pupils concerned are not in need of targeted early intervention nor that referrals need to be made to social services and that it would be appropriate to handle the incident internally, perhaps through utilising their Behaviour Policy and by providing pastoral support.

2 Those requiring Early Intervention:

Schools must be familiar with, and work in line with their local safeguarding arrangements.

The school may decide that while pupils involved do not require referral to social services, they may benefit from early intervention. Early intervention encompasses providing support as soon as a problem emerges, at any point in a child's life. Providing early intervention is more effective in promoting the welfare of pupils than reacting later. Early intervention can be particularly useful to address non-violent Harmful Sexual Behaviours (HSB) and PSB and may prevent escalation into sexual harassment and/or sexual violence.

All concerns, discussions, decisions, and reasons for decisions, including why certain decisions have not been made must be recorded.

3 Those where social services will need to be informed and involved:

Where a child has been harmed, is at risk of harm, or is in immediate danger, but a criminal offence may not have been committed, schools must make a referral to Social Services. At the point of referral schools will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of Social Services. If a referral is made, Social Services will then make enquiries to determine whether any of the pupils involved are in need of protection or other services. Schools should not wait for the outcome (or even the start) of a Social Services investigation before protecting the victim and other pupils in the school. All concerns, discussions, decisions, and reasons for decisions, including why certain decisions have not been made must be recorded. Schools must liaise with social services and any other agency involved so any actions do not jeopardise any enquiry.

Should social services, having received the school referral, decide that intervention is not appropriate, the school must escalate or re-refer if they believe any pupil is at risk of harm or in danger (or if circumstances change).

4 Those where a criminal offence is likely to have occurred and the Police will be needed:

The CPC, with the knowledge and support of the RSL, will lead the school's response to any incident where there is evidence that a criminal offence has occurred or is likely to occur. However, schools are not alone in dealing with sexual violence and sexual harassment. The Police will be important partner where it is thought that a crime might have been committed. Referrals to social services will often be a natural progression of making a referral to Social Services and will generally run in parallel. All concerns, discussions, decisions, and reasons for decisions, including why certain decisions have not been made must be recorded (written or electronic).

It is important for the CPC to explain to any child involved that the law is in place to protect all pupils and young people rather than criminalise them, and this should be explained in a way that avoids alarming or distressing them. Ultimately, the CPC will need to balance the victim's wishes against their duty to protect the victim and other pupils The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. If the CPC/DCPC decide to go ahead and make a referral to Pupils' social services and/or a report to the Police against the victim's wishes, this should be handled extremely carefully. There are no easy or definitive answers when a victim makes this request. The reasons should be explained to the victim and appropriate specialist support should be offered.

However, where a report of rape, assault by penetration or sexual assault is made, or upskirting, the starting point is that this must be passed on to the Police. Whilst the age of criminal responsibility is 14 years, if the alleged perpetrator(s) is younger than this, the starting principle of reporting to the Police remains, whilst also informing Social Services.

Informing parents/carers

Schools will generally inform parents or carers of the victim pupil unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. It is best practice for the school to meet the victim's parents/carers with the victim pupil present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes.

In circumstances where parents/carers have not been informed, it will be especially important that the school is supporting the child in any decision they take. This should be with the support of Social Services and any appropriate specialist agencies. The school must record all their actions clearly and advice taken from external agencies

The school will take advice from social services/Police when deciding when to inform the parents/carers of the alleged perpetrator, who will do this and what will be disclosed. It is best practice for the school to meet the perpetrator's parents/carers with their child present to discuss what arrangements are being put in place that may impact them e.g. moving them out of classes with the victim.

Confidentiality

Schools must do all they reasonably can to protect the anonymity of any pupils involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the pupils involved.

Support and sanction for the perpetrator

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time. Our approach will be to implement preventative and/or forward-looking action to safeguard the victim.

It may also be that the perpetrator requires safeguarding, especially where there are concerns that a perpetrator themselves may have been a victim of abuse. It is important that the perpetrator(s) is/are also given the correct support to try to stop them from re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

The school may sanction (in line with the Behaviour Policy), any child whose conduct falls below the standard which could be reasonably expected of them, and disciplinary action may be taken whilst other investigations by the Police and/or local authority pupils' social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent a school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. This is a matter for the school and will be carefully considered on a case-by-case basis.

That said, the school will consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the Police and/or Social Services will help the school make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for the school to reach its own view about what happened while an independent investigation is considering the same facts.

Conviction/caution

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, in all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in the same school would seriously harm the education or welfare of the victim (and potentially other pupils). The school should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. However, where the perpetrator(s) is going to remain at the school, the principle would be to continue keeping the victim pupil and perpetrator(s) in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the Police and the case is not progressed, or they are reported to the Police and ultimately result in a 'not guilty' verdict when the matter goes to trial. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator(s). Appropriate support should be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis. All of the above should be considered with

the needs and wishes of the victim at the heart of the process (supported by parents/carers as required).

Any arrangements should be kept under review. In all cases, the school must record and be able to justify their decision-making.

G Managing situations involving mental health

The staff member identifying the emerging need should

- **Ask** the child how they are feeling, what support they need and want
- **Consider** the risk of harm to the child from self or others and try to reduce any immediate risk that is present (including summoning the First Aider/equivalent as required)
- **Listen** to the child and give them time to talk; give reassurance, and work with them on avenues of support
- **Tell** the CPC

What to do if there are concerns about a child's mental health

If staff have a mental health concern about a child, they should follow the above steps, dealing with any imminent medical risk as a priority. Should there also be safeguarding concerns about the child, then appropriate decisions will be made to safeguard the child by the CPC. Likewise, if there are safeguarding concerns about any child, consideration about how this may be impacting on the child's mental health will be taken into consideration.

Clear actions for intervention will be decided, working in partnership with the parents/external agencies if involved with consent. These interventions will be reviewed at every subsequent meeting, or before as the need arises, as is often the case with pupils who are experiencing poor or deteriorating mental health.

Parents/carers must always be contacted when signs/indicators of deteriorating/emerging mental health are first displayed (unless to do so would heighten the risk of harm to the child, in which case agencies will be contacted for advice).

Staged interventions

School interventions to promote positive mental health are more successful when pupils and their parents/carers participate in any decision making. Any interventions put in place by school staff to support pupils with their mental health are therefore planned, co-ordinated, targeted appropriately, then sustained and evaluated.

With regards to the support offered to pupils, please see below:

Universal support

We will support the emotional wellbeing of all pupils in partnership with their parents/carers, who hold main responsibility for meeting their child's needs.

Pastoral Support

Some pupils, in addition to the above, may require enhanced levels of *pastoral* support for their wellbeing in the form of informal daily or weekly check-ins with nominated staff.

Targeted support

For some pupils, enhanced pastoral support may not be enough to meet their emerging mental health needs. They will be given additional targeted support with nominated staff.

External Support

For some pupils, enhanced pastoral support and targeted support may not be enough to meet their need. In these situations, the parents of the child will be signposted to an external mental health agency/organization/professional/GP. The school will also make a referral to an external agency as required.

Language to use

The appropriate use of language when speaking to a child whose mental health is deteriorating, or when they express thoughts or plans to self-harm or attempt suicide is important.

When pupils are self-harming

Should an incident occur where a pupil has harmed themselves, first aid will be administered by the school's nominated First Aider and their parents contacted, unless to do so will place the pupil potentially at greater risk of harm (in these situations, Social Services and the RSL will be contacted for advice).

Should a more serious incident occur whereupon a pupil requires urgent medical assistance after harming themselves, an ambulance will be called immediately via 112, and the parents/carers contacted (unless to do so will place the pupil potentially at greater risk of harm).

When pupils have suicidal ideation

Should a pupil voice that they are considering/intending to harm themselves by taking their own life:

1. they will be 100% supervised by appropriately trained school staff immediately AND
2. their parents/carers will be called and asked to collect their child immediately from school. They will be advised to take their child to Accident and Emergency (hospital) to have an urgent mental health assessment.

When a pupil attempts suicide

Should an incident occur in school (or before the pupil arrives at school, at home or in the community) and a child states that they have attempted to take their life the parents will be contacted unless to do so will place the pupil potentially at greater risk of harm. In this circumstance, an urgent referral must be made to children's social services.

If the pupil requires medical aid, this will be administered and if necessary, an ambulance called.

Safeguarding Risk Assessment

All pupils who have a diagnosed mental health illness, have self-harmed, and/or have suicidal ideation or have attempted to end their life **must** have a Safeguarding Risk Assessment which is reviewed on a 4-week cycle (minimum).

The child's parents/carers must be informed of the above risk assessment and the control measures in place to keep their child as safe as possible whilst in school. The content of the risk assessment must also be shared with the pupil so that they know the support that has been put in place. Their wishes and feelings must be included in this risk assessment.

All Safeguarding Risk Assessments involving suicidal ideation and/or suicide attempt and /or and significant self-harming **must** be shared with the RSL.

When pupils are too unwell to attend school (temporary)

In some situations, akin to when a child is physically very unwell, the mental health needs of a child may be so serious that the school is unable to keep them safe on the school site despite a range of supportive interventions being attempted. Discussions about how interventions are managed are facilitated with the parents at every step of their child's journey. If the pupil is too unwell to attend school, their absence will be coded as illness.

Any decision made about the pupil being unable to attend school may be a temporary measure until the child's mental health is medically assessed by the child's treating clinician as stable enough for them to safely return to school (this may be an immediate full return or a part-time timetable by arrangement). This medical assessment must be put in writing for the school, and in combination with the individual context and facilities of the school will inform the final decision prior to the child reintegrating.

When pupils are too unwell to attend school (permanent decision)

In a very small minority of situations, despite a range of supportive interventions attempted, a pupil's mental health needs and associated behaviours are such that the school can no longer keep them safe on the school site. A decision may be made by the school, after seeking advice from the Cognita legal team and MD, that the school is no longer the most appropriate setting to meet the child's mental health needs. All avenues and options will be considered before this serious step is taken. The parents/carers will be supported in this rare situation to find alternative educational provision.

H Visiting speakers

Inviting visiting speakers to events can significantly enhance the educational experience by providing pupils with real-world insights and experiences. Speakers can broaden pupils' horizons by exposing them to diverse cultures, communities, and forms of knowledge, enriching their understanding beyond the classroom. Sessions can also foster skill development, connecting academic concepts with real-world applications, helping pupils understand how theoretical knowledge translates to professional practice. These benefits contribute to a more comprehensive and engaging educational experience, preparing pupils for their future careers and personal growth. The school's responsibility to pupils is to ensure that they can critically assess the information that they receive as to its value to themselves, and that such information is aligned to the ethos and values of the school and values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

The school has clear protocols for ensuring that any visiting speakers are suitable.

All requests for visits from visiting speakers must firstly be discussed and agreed with the Headteacher/Principal.

Prior to this agreement, the school will:

- complete through due diligence before agreeing to a visiting speaker attending the school
- conduct research on the visiting speaker and/or their organisation, including social media checks
- not use a visiting speaker where any link is found to extremism, such as extremist groups and movements
- be satisfied, that the speaker is not in any way contrary to the school's values
- be cautious when considering organisations with strong partisan views on contested topics, or that perpetuate stereotypes or encourage people to question their gender.

Prior to the visiting speaker session, the school will:

- meet with the visiting speaker to share the school's expectations of the session
- discuss the planned content of the session and how this will be delivered, including any use of IT
- request a copy of the visiting speaker's presentation and/or footage in advance of the session
- ensure that activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication
- ensure that the speaker's planned content:
    - is appropriate for the age and maturity of the pupils to be in attendance
    - does not undermine school values
    - does not marginalise any communities, groups or individuals
    - does not seek to glorify or incite hatred, misogyny, misandry, criminal activity and/or violence
    - does not seek to radicalise students through extreme or narrow views of faith, religion or culture or other ideologie

- inform the speaker that school staff have the right and responsibility to interrupt and/or stop their presentation if it challenges the above requirements
- ensure that the visiting speaker is aware that they must not take photos of the pupils on any personal devices, and/or without permission
- ensure that the visiting speaker is made aware of appropriate dress, language, and behaviour
- ensure that the speaker knows and understands the school safeguarding procedures and the Code of Conduct, including the use of personal phones and wearing of smart devices
- review/vet any literature* that the speakers will provide, in terms of content and quality, prior to making this available to pupils

*Promotional literature which addresses political issues belonging to any visiting speaker will not be made available to pupils.

During the visit, the school will:

- ensure that the visiting speaker shows an original current identification document (which includes a photograph), signs into the schools entry system, and is given a visitor's lanyard
- ensure that the visiting speaker is given a 'visitors leaflet' which gives them information on safeguarding and emergency procedures in school
- supervise any visiting speaker at all times during their visit (by a member of permanent staff)
- ensure that no visiting speaker is ever with a pupil on a one-to-one basis

- ensure that the visiting speaker does not use any device that is prohibited (see above Online Safety)

In the unlikely event that the talk/presentation does not meet the above requirements in terms of content and delivery, school staff must interrupt and/or stop a presentation.

Whilst a balance must be struck and alternative viewpoints always taught, visiting speakers may include representatives of political parties or campaigning organisations (ISS 2026). Visiting speakers are not permitted to raise or gather funds for any external organisation or cause without express permission from the Headteacher/Principal.

I Organisations or Individuals Letting School Premises

Schools have a duty to ensure that appropriate arrangements are in place to keep pupils safe when allowing outside organisations to use their facilities. If the activity is being run by the school, or overseen by the school, then this policy and the school's procedures apply. If not, and the school is renting out their space to an organisation or individual, then the school must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place **and** ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the pupils who attend any of these services or activities are pupils on the school roll.

Should the organisation wishing to use the school premises **not** have any safeguarding policies or procedures in place, then the organisation must not be allowed to let the facilities. The school should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Schools may receive an allegation relating to an incident that happened when an individual or organisation was hiring their school premises for the purpose of running activities for pupils (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools should follow this policy and process (see above).

Part 4: Resources and guidance

Teaching Pupils About Safeguarding

- DfE advice for schools: teaching online safety in schools
- UK Council for Internet Safety (UKCIS) guidance: Education for a connected world

- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with pupils and young people
- The UKCIS external visitor's guidance helps schools to ensure the maximum impact of any online safety sessions delivered by external visitors
- National Crime Agency's CEOP education programme: Thinkuknow
- Public Health England: Every Mind Matters

Online Safety

- More information around teaching online safety, can be found here.
- Additional information to support schools to keep their pupils safe online (including when they are online at home) is provided in KCSIE (2025).

Categories of Abuse

The Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with pupils and young people to identify and respond appropriately to concerns of child sexual abuse. They have also introduced new resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours.

Sexual Violence and Sexual Harassment

The HSB toolkit from The Lucy Faithfull Foundation is designed for parents, carers, family members and professionals, to help everyone play their part in keeping pupils safe. It has links to useful information, resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families

The Lucy Faithfull Foundation in collaboration with the Home Office, has also developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

The NSPCC provides free and independent advice about HSB: NSPCC Learning: Protecting pupils from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.

Beyond Referrals | Contextual Safeguarding provides a school self-assessment toolkit and guidance for addressing HSB in schools.

The Preventing harmful sexual behaviour in pupils - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping pupils safe, they also run a free confidential helpline.

The Anti-Bullying Alliance has developed guidance and training for schools about Sexual and Sexist bullying.

Schools should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities. The principles described in Childnet's cyberbullying guidance could be helpful.

Additional information on confidentiality and information sharing is available at Safeguarding Practitioners Information Sharing Advice

Child Criminal Exploitation

More information can be found in the UK government guidance KCSIE (2025), in the Home Office's 'Preventing youth violence and gang involvement' and its 'Criminal exploitation of pupils and vulnerable staff: county lines guidance'.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office here.

County Lines Toolkit For Professionals - The Pupils' Society in partnership with Victim Support and National Police Chiefs' Council.

Child Sexual Exploitation

For more information, see Child Sexual Exploitation: Guide for Practitioners

Financially motivated Sexual Extortion

Find more information and advice from the Internet Watch Foundation here.

Sharing of Nudes, Semi Nudes, Sexual Imagery

LGFL 'Undressed' provides schools advice about how to teach young pupils about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

For more guidance from UKCIS around sharing nudes/semi-nudes read here.

Forced Marriage

Multi-agency practice guidelines: handling cases of forced marriage

The right to choose: government guidance on forced marriage -GOV.UK (www.gov.uk)

School staff can contact the Forced Marriage Unit if they need advice or information:

Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

FGM, Virginity Testing

Virginity testing and hymenoplasty: multi-agency guidance - GOV.UK

Behavioural Signs in Pupils

- National Schools Safeguarding Guidance (developed by Metropolitan Police Service) The Guidance for Schools and Colleges: Safeguarding Pupils from Sexual Violence, CSE and Harmful Practices has a chapter on CALFB.
- Schools Charter on Ending Harmful Practices
- This Schools Charter encourages the delivery of high quality, safeguarding focused inputs on harmful practices.
- UK Government: National Action Plan to Tackle Child Abuse Linked to Faith or Belief
- Centre for FGM: 21-02-2024---Child-Abuse-linked-to-Faith-or-Belief-Leaflet.pdf
- Child abuse linked to faith or belief | Metropolitan Police

Grooming

See the NSPCC website for further information about grooming.

Adverse Childhood Experiences

- ACEs (Adverse Childhood Experiences) - Early Education
- A practical handbook on Adverse Childhood Experiences (ACEs) Delivering prevention, building resilience and developing trauma-informed systems: A resource for professionals and organisations - World Health Organization Collaborating Centre On Investment for Health and Well-being
- Understanding trauma and adversity | Resources | YoungMinds
- The Little Book of Adverse Childhood Experiences | National Education Union
- Trauma and child brain development training | NSPCC Learning

Mental Health

The UK Department of Education has published advice and guidance on Preventing and Tackling Bullying, Mental Health and Behaviour in Schools, and ‘Every interaction matters’. The latter is a pre-recorded webinar which provides staff with a simple framework for promoting wellbeing, resilience, and mental health.

In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance, Promoting Pupils and Young People’s Emotional Health and Wellbeing. Its resources

include social media, forming positive relationships, smoking and alcohol. See Rise Above for links to all materials and lesson plans.

Why language matters: rethinking the language of suicide | NSPCC Learning

The Spanish Government published a Plan de Prevención de Suicidio 2025 – 2027
https://www.fsme.es/plan-estatal-prevencion-suicidio/

Teléfono de la Esperanza 717 003717 info@telefonodelaesperanza.org ayuda@telefonodelaesperanza.org

Ministerio de Sanidad – teléfono 024. Anytime. Online chat also available
https://www.sanidad.gob.es/linea024/home.htm

Pupils with Specific Vulnerabilities

- SEND Code of Practice 0 to 25 years, and
- Supporting Pupils at School with Medical Conditions
- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS).
- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with pupils and young people
- NSPCC - Safeguarding pupils with special educational needs and disabilities (SEND) and NSPCC - Safeguarding d/deaf and disabled pupils and young people

Contextual Safeguarding

Child exploitation disruption toolkit – Home Office (UK) statutory guidance
Multi-agency practice principles for responding to child exploitation and extra-familial harm.

Letting School Premises

Guidance around keeping pupils safe in out of school settings can be found here. This document details the safeguarding arrangements that schools should expect these providers to have in place, and schools must check that any hirers have met this guidance.

Version control:

Ownership and consultation	
Document Sponsor	Director of Education -Europe and USA
Document Author / Reviewer	Regional Safeguarding Lead- Europe and USA Reviewed March 2026 Reviewed June 2026 Reviewed September 2026
Consultation & Specialist Advice	Head of Legal -Europe and USA (July 2025) Group Chief Education Officer (July 2025)
Document application and publication	
England	Yes
Spain	Yes, legislation adapted for country
Italy	Yes, legislation adapted for country
Greece	Yes, legislation adapted for country
Switzerland	Yes, legislation adapted for country
Austria	Yes, legislation adapted for country
USA	Yes, legislation adapted for country
Version control	
Current Review Date	June 2026
Next Review Date	June 2027 or earlier as needed
Related documentation	
Related documentation	Staff Code of Conduct Use of Reasonable Force, Restrictive Interventions, and/or Restraint, incorporating Screening, Searching, and Confiscation Child Supervision, Lost, and Missing Children Policy Children Absent from Education, Child Missing Education, and Attendance Policy Safer Recruitment Policy IT Policy AI Policy Behaviour Policy Anti-Bullying Policy Early Years Use of Mobile Phones and Cameras Early Years Foundation Stage framework SEND Policy

	EDI Policy Disciplinary Policy Social Media Policy Drug and Alcohol Policy Whistleblowing Policy RSE Policy Group Safeguarding Governance and Oversight Policy