Safeguarding & Child Protection Policy

To Include Early Years Foundation Stage (EYFS)

Academic Year: 2026 / 2027

Date of review: August 2026

Date of publication: September 2026

Date of next review: August 2027

Person(s) responsible for review and role:

Headteacher: Nadia Ward

Designated Safeguarding Lead: Ella Whitbread

PARK SCHOOL

Table of Contents

Aim of policy: 2

Related Guidance and School Policies 2

1. Safeguarding in our school 4

1.1 Definition of Safeguarding 5

1.2 Definition of child protection 5

1.3 Definition of a child 5

2. Key Contacts 5

2.1 Safeguarding is Everyone's Responsibility 8

2.2 Specific safeguarding roles in the school 9

2.3 Training 10

2.4 Proprietor's role and responsibilities 12

2.5 Safer Recruitment 14

2.6 Policy Review 15

2.7 Teaching children about safeguarding 17

2.8 Online Safety 19

2.9 Categories of Abuse 22

2.10 Protected Characteristics 26

2.11 When does behaviour become abuse / exploitative? 27

2.12 Child Criminal Exploitation (CCE), Including Serious Violence 32

3. Female Genital Mutilation, Virginity Testing and Hymenoplasty, and Breast Flattening 37

3.1 Virginity testing and Hymenoplasty 37

3.2 Breast Flattening (also known as Breast Ironing) 37

3.3 Faith or Belief-Related Child Abuse 38

3.4 Behavioural Signs in Children 39

3.5 Grooming 41

3.6 Radicalisation 43

3.7 Mental Health 44

3.8 Children with Additional Needs or Disabilities 47

4.1 Stages of Safeguarding 50

4.2 Contextual Safeguarding 51

4.3 What to Do If You Have Concerns About a Child 51

4.4 Transferring Safeguarding Records 54

PARK SCHOOL

4.5 Reporting and Recording Concerns About an Adult in School 54
4.6 Whistleblowing 57
4. Managing Situations 58
5.1 Managing situations involving child-on-child abuse 58
5.2 Visiting professionals and speakers 60
5.3 Use of School Premises by External Organisations 61

Aim of policy:

The purpose of this policy is to safeguard and promote the welfare of all children at **Park School and Little Crickets** by providing a clear framework for preventing harm, identifying concerns, responding effectively to abuse, neglect and exploitation, and fulfilling statutory safeguarding responsibilities.

Related Guidance and School Policies

This policy outlines the acceptable use of technology but is not exhaustive in its scope and should be used in conjunction with the following policies, statutory guidance and advice:

Policies:

- *Accessibility Plan*
- *Administration of Medicines Policy*
- *Admissions Policy*
- *Animals on Site Policy*
- *Anti-Bullying Policy*
- *Artificial Intelligence Policy*
- *Attendance Policy*
- *Behaviour, Rewards & Sanctions Policy*
- *Complaints & Concerns Policy*
- *Continuous Professional Development Policy*
- *Controlled Medicines Policy*
- *Crisis Management Policy*
- *Digital & Technology Acceptable Use Policy*
- *Drug, Alcohol & Tobacco Misuse Policy*
- *Equality, Diversity & Inclusion Policy*
- *Filtering & Monitoring Policy*
- *First Aid Policy*
- *Guardianship Policy*
- *Health & Safety Policy*
- *Infection Control & Illness Policy*
- *Lockdown Policy*
- *Low Level Concerns Policy*

- *Mental Health & Emotional Wellbeing (Whole School) Policy*
- *Missing Pupils Policy*
- *Peripatetic Teacher Policy*
- *PSHEE Policy*
- *RSHE Policy*
- *Physical Intervention & Restraint Policy*
- *Prevent (Extremism & Radicalisation) Policy*
- *Remote Learning Policy*
- *Risk Assessment Policy*
- *Safer Recruitment Policy*
- *Search & Confiscation Policy*
- *SEND Policy*
- *SMSC Policy*
- *Staff Accommodation Policy*
- *Staff Code of Conduct*
- *Staff Digital Acceptable Use Policy*
- *Supervision of Pupils Policy*
- *Transport Policy*
- *UKVI Sponsorship Policy*
- *Visitors, Contractors & Site Security Policy*
- *Whistleblowing Policy*

Statutory & Regulatory Guidance:

- *The Education (Independent School Standards) Regulations (2014)*
- *Keeping Children Safe in Education (KCSIE) (2026)*
- *Working Together to Safeguard Children (2023)*
- *Working Together to Improve Attendance (2024)*
- *Prevent Duty Guidance: for England and Wales (2023)*
- *Disqualification under the Childcare Act (2018)*
- *What to do if you are worried a child is being abused remains relevant but should be cross-referenced with Working Together to Safeguard Children (2023) and Information Sharing Guidance (2024).*
- *Early Years Foundation Stage Framework (2025)*
- *Use of Reasonable Force, Restrictive Interventions and Restraint (2025)*
- *Relationships Education, Relationships and Sex Education (RSE) and Health Education (2025)*
- *Gender Questioning Children (2023)*
- *Children Missing Education (2016, updated through KCSIE 2026)*
- *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (2024)*
- *Meeting Digital and Technology Standards in Schools and Colleges (DfE)*
- *Filtering and Monitoring Standards for Schools and Colleges (DfE)*

PARK SCHOOL

- *Generative Artificial Intelligence in Education Guidance (DfE)*
- *Keeping Children Safe in Out of School Settings (2023)*
- *Sharing Nudes and Semi-Nudes: Advice for Education Settings (UKCIS)*
- *Children's Wellbeing and Schools Act related safeguarding reforms (where implemented)*
- *NPCC When to Call the Police Guidance*
- *Early Years Foundation Stage Framework (2025) → framework effective 1 September 2026*
- *Working Together to Safeguard Children (2023) → 2026 edition*
- *Use of Reasonable Force, Restrictive Interventions and Restraint (2025) → statutory guidance effective 1 April 2026;*
- *Prevent Duty Guidance (2023)" → updated March 2024*
- *Children Missing Education (2016…) → standalone statutory guidance revised September 2025.*
- *1 SEPTEMBER 2026: the Crime and Policing Act 2026 removes the supervision exemption from regulated activity. Volunteers who teach, train, instruct, care for or supervise children on more than 3 days in any 30-day period, or overnight, are now in regulated activity regardless of supervision, and require an enhanced DBS check with children's barred list information.*
- *Children's Wellbeing and Schools Act 2026 — Royal Assent April 2026, provisions phased from late 2026 into 2027, including the unique child identifier, children not in school registers, strengthened multi-agency safeguarding duties for schools and mobile phone policies.*
- *Safeguarding Vulnerable Groups Act 2006 — duty to refer to the DBS where an adult is removed from regulated activity*
- *The Independent School Standards: Guidance for Independent Schools — April 2026*
- *Searching, Screening and Confiscation in Schools — DfE, July 2023*
- *National Minimum Standards for Boarding Schools — May 2026*
- *Children Act 1989 (ss.17 and 47) and Children Act 2004 (s.11)*

1. Safeguarding in our school

Although safeguarding principles are universal, each school community is unique. The risks faced by pupils can vary depending on a school's specific context, and safeguarding practices must be adapted accordingly. A school's safeguarding culture is defined not just by policies, but by the everyday actions, language, and behaviours of its staff and wider community.

Safeguarding is the shared responsibility of every adult in the school and nursery. It is only effective when lived out in practice consistently, confidently, and with the best interests of the child always at the centre.

We are fully committed to promoting the safety, wellbeing, and mental and physical health of every child. Our aim is to provide a nurturing environment where all children feel safe, valued, and supported to thrive academically, socially, and emotionally.

To achieve this, we will:

- Proactively teach pupils about safeguarding and how to keep themselves safe
- Implement and maintain strong safeguarding procedures
- Respond quickly and decisively to any concerns, always prioritising the child

Our Approach

- Safeguarding practices are consistent across all Forfar schools.
- All staff will receive regular training to identify and respond to signs of abuse, neglect, or exploitation.
- Staff will develop strong, supportive relationships with pupils to help them feel secure and listened to.
- Children will be encouraged to speak up, learn about risk, and know where to seek help.
- Safe recruitment procedures will be followed for all adults working with or on behalf of the school.

Scope

This policy applies to all children, including those in Early Years, and to all adults working in any capacity within or for the school. This includes teaching and non-teaching staff, pastoral teams, peripatetic staff, supply/agency workers, volunteers, contractors, and Forfar staff based off-site.

It covers all school-based activities, off-site visits, school trips, and any external providers delivering activities on behalf of the school.

1.1 Definition of Safeguarding

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

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

1.2 Definition of child protection

Child protection is part of the safeguarding process and is defined as: protecting individual children identified as suffering or likely to suffer significant harm.

1.3 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 our pupils.

2. Key Contacts

School contacts	
Designated Safeguarding Lead (DSL)	Ella Whitbread (School) Rebecca Mellowes (Nursery)

Deputy Designated Safeguarding Leads (DDSLs)	Nadia Ward Rosie Cattani Hannah Woodford Emma Wood Suzy Moyse-Bartlett Rachel Carruthers Maliyah Paddock
Any other staff trained to DSL level	Katie Hill
Designated Practitioner with responsibility for safeguarding in early years (where appropriate)	Rebecca Mellowes
Deputy Designated Practitioner with responsibility for safeguarding in early years (where appropriate)	Hannah Woodford and Emma Wood
Inclusivity Champion	Suzy Moyse-Bartlett
Designated Lead for Children not Cared for by their parents	Nadia Ward
Mental Health and Emotional Wellbeing Lead	Ella Whitbread
Headteacher	Nadia Ward

Forfar Education contacts	
Group Safeguarding Lead	Fiona Carter
Whistleblowing Officer	Christine Pouncett
Chair of Governors (CEO Forfar Education)	John Forsyth jf@forfareducation.co.uk 07780 816294

Local Authority Contacts	
Our school follows the safeguarding protocols and procedures of our Safeguarding Partners	Early Help – Bournemouth, Christchurch & Poole - BCP Safeguarding Children Partnership and the Dorset Safeguarding Children Partnership
The local authority Children's Services	Children's First Response Hub for child abuse or neglect concerns | BCP
The local authority Children's Social Care referral team	**Children's First Response Hub** 01202 123 334 childrensfirstresponse@bcpcouncil.gov.uk Inter-agency referral form Out of hours service on 01202 738 256

PARK SCHOOL

The local authority Designated Officer for child protection (sometimes still referred to as the LADO)	Local Authority Designated Officer (LADO) - training and briefing for childcare professionals | BCP 01202 817 600 LADO@bcpcouncil.gov.uk
The local authority Prevent Lead/Officer	https://www.bcpcouncil.gov.uk/Assets/Communities/PREVENT-National-Referral-Form-OCT-24-VERSION-BCP-DC.pdf To make a referral you can: • call the National Police Prevent advice line on 0800 011 3764 • use the Dorset Police online referral form • download the National Prevent referral form

Police	
Police emergency	999
Local police non-emergency	101
Location of safeguarding and child protection documents in school	Headteachers Office
UK National Contacts for across the region	
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
STARS – Sexual Trauma and Recovery Service	Home - STARS Dorset
Family Information Directory (FID)	Family Information Directory
Children and young people with special educational needs and disabilities (SEND)	The Bournemouth, Christchurch and Poole SEND Local Offer - BCP Council
CAMHS	CAMHS (Child and adolescent mental health services) :: Dorset HealthCare University NHS Foundation Trust

2.1 Safeguarding is Everyone's Responsibility

Safeguarding in our school is a shared duty. No one person has the full picture of a child's life, so it is essential that everyone plays their part identifying concerns, sharing information, and acting quickly. All staff must take a child-centred approach, always acting in the best interests of the child.

All staff must:

- Read and understand this policy and all related guidance.
- Create a safe environment where every child can thrive.
- Recognise that children may not disclose abuse or may not see their experiences as harmful.
- Respond appropriately if a child reports abuse, neglect, exploitation, or sexual harassment/violence.
- Raise concerns about any adult's behaviour with the Headteacher, or Group Lead Safeguarding if the concern involves the Headteacher.
- Refer concerns about children to the DSL or Deputy DSL without delay.
- Maintain appropriate confidentiality.
- Understand online safety risks, including filtering and monitoring systems used in school.
- Know the local Early Help process, and when to identify and support children who may benefit from it.
- Understand how to make referrals to:
    - Children's Social Care
    - The Police
    - The Prevent duty

Safeguarding is not just a policy; it is daily practice. Every adult in our school community plays a crucial role in protecting children. All staff, regardless of role, must read and understand Part One of Keeping Children Safe in Education 2026. The previous condensed safeguarding summary no longer applies. Safeguarding is everyone's responsibility and all staff must understand the indicators of abuse, neglect, exploitation, mental health concerns, online harms and contextual risks affecting children.

2.2 Specific safeguarding roles in the school

Designated Safeguarding Lead

The DSL has strategic responsibility for creating and maintaining an effective safeguarding culture across the school. This includes ensuring safeguarding is embedded within curriculum planning, staff development, behaviour systems, attendance monitoring, online safety arrangements and risk assessment processes.

The DSL must ensure that safeguarding concerns relating to violence against women and girls, misogyny, harmful sexual behaviour, image-based abuse, AI-generated abuse, online exploitation and discrimination are identified early and responded to effectively.

Deputy Designated Safeguarding Lead

The school may appoint multiple Deputy Designated Safeguarding Leads (DDSLs) to assist the DSL in carrying out safeguarding duties. While DDSLs can handle many of the tasks associated with the DSL role, the ultimate responsibility for child protection remains with the DSL and cannot be transferred. Deputy DSLs receive the same level of training as DSL, and their responsibilities are clearly outlined in their job descriptions.

Support for the DSL

The DSL is provided with adequate time, funding, training, resources, and support to offer guidance and assistance to other staff regarding child welfare and protection concerns. They also participate in Strategy Discussions and other inter-agency meetings (see WTSC 2023), support colleagues involved in these processes, and contribute to child assessments.

There are 4 key elements to the DSL role:

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

The DSL is responsible for:

- Making referrals to children's Social Care when abuse is suspected
- Supporting staff members who refer cases to children's Social Care
- Referring cases with radicalisation concerns to the Channel programme, working alongside the school Prevent Lead, and assisting staff making such referrals
- Reporting cases to the Disclosure and Barring Service when someone is dismissed or leaves due to posing a risk or harm to a child

- Informing the Police if a crime may have been committed
- Referring children to mental health services and directing parents to relevant organisations or professionals when there are concerns for a child's emotional or mental wellbeing, in collaboration with the school Wellbeing/Mental Health Lead(s)
- Following up, escalating, or re-referring cases if a child's situation does not improve after intervention or if there is a lack of parental engagement
- Acting as a main point of contact for Safeguarding Partners
- Updating the Headteacher about safeguarding matters, including ongoing enquiries under section 47 of the Children Act 1989 and any Police investigations
- When needed, working with the "case manager" and the local authority's Designated Officer for child protection concerns involving school staff
- Working closely with staff such as pastoral support, Wellbeing/Mental Health Lead(s), school nurses, IT technicians, and SENCO on all safety and safeguarding matters—including online safety—and when making decisions about referrals, by coordinating with relevant agencies
- Serving as a source of support, advice, and expertise to all staff
- Encouraging positive engagement with parents or guardians regarding safeguarding and children's welfare, especially for families facing challenges

2.3 Training

All safeguarding training must reflect current statutory guidance, emerging risks and local safeguarding arrangements. Starting from September 2026, safeguarding induction and refresher training must ensure all staff have read KCSIE Part One in full. Annual updates should include child-on-child abuse, AI-enabled abuse, online harms, violence against women and girls, harmful sexual behaviour, attendance concerns, contextual safeguarding, serious violence and local safeguarding priorities.

Both the DSL and Prevent Lead are required to participate in government Prevent awareness training. This is separate from the Preventing Radicalisation Awareness training that all school staff must undertake annually. The DSL must also complete Online Safety training annually and on an ongoing basis. Additionally, the DSL is expected to complete Safer Recruitment training.

Beyond the formal training listed above, the DSL should keep their knowledge and skills current through informal means such as e-bulletins, connecting with other DSLs online via the hub facility or in person, or reading up on recent developments in safeguarding. These updates should occur at least once a year, or more frequently if needed, so that they can:

- Gain an understanding of the procedures for early help and statutory interventions, including the local authority's referral criteria and thresholds for children's Social Care.
- Be familiar with how local authorities conduct child protection case conferences and review meetings and be prepared to participate and contribute effectively when required.
- Ensure every staff member especially new, part-time, or agency staff has access to and understands the school's safeguarding and child protection policies and procedures.

PARK SCHOOL

    - Remain vigilant regarding the specific needs of children with child in need plans, those on child protection plans, children who are 'looked after' or have previously been, those with special educational needs, and young guardians.
    - Maintain high expectations for vulnerable children's achievement by understanding their welfare and safeguarding needs, and recognising how these might affect their attendance, engagement, and academic progress.
    - Support teaching staff in confidently providing additional academic help or reasonable adjustments for children who have a Social Worker or have previously needed one, understanding that the effects may persist even after intervention ends.
    - Keep up to date with relevant data protection laws and regulations, especially the Data Protection Act 2018 and GDPR.
- Appreciate the importance of information sharing both within the school and with the three Safeguarding Partners, as well as other agencies, organisations, and professionals.
- Keep thorough, accurate, and secure written records of any concerns and referrals.
- Support the school in partnership with the Prevent Lead on all Prevent duty requirements and be prepared to offer staff advice and guidance on protecting children from radicalisation.
- Understand the specific risks related to online safety and stay up to date with the knowledge and skills needed to keep children safe online at school, including awareness of the school's filtering and monitoring protocols.
- Recognise the added risks faced by children with SEND online, such as online bullying, grooming, or radicalisation, and be confident in supporting these children to stay safe.
- Be aware of the unique online safety challenges for LGBTQ+ and/or gender-questioning children (or those perceived as such) and be able to help them stay safe online.
- Monitor attendance closely, particularly for children who are persistently absent or those on sponsored visas.
- Seek out resources and attend relevant or refresher training sessions as needed.
- Foster a culture where staff listen to children, consider their views, and incorporate their wishes and feelings into any protective measures put in place by the school.

The DSL 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 Group Safeguarding Lead to ensure that this happens. Any updates throughout the year will be added and information disseminated to all staff.
- ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals to children's Social Care 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 local Safeguarding Partners 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 children by sharing the information about the welfare, safeguarding and child protection issues that these children,

PARK SCHOOL

including children with a Social Worker, are experiencing, or have experienced, with teachers and school leadership staff.
- Their role could include ensuring that the school, and their staff, know who vulnerable children 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 children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Availability

During term time, the DSL (or a deputy) will always be accessible (during school hours) for staff to discuss any safeguarding concerns. Although the DSL (or deputy) is generally available in person, the Headteacher will determine what constitutes "availability," which could also include access via work phone or Microsoft Teams in exceptional situations. It is the responsibility of both the Headteacher and DSL to ensure that suitable cover arrangements are in place for any activities that take place outside of regular hours or during school holidays. This includes nursery provision throughout the year.

2.4 Proprietor's role and responsibilities

Forfar Education are committed to meeting all legal obligations and consistently following statutory guidance to ensure our policies, procedures, and training are effective and compliant.

Our responsibilities as proprietor include:

- Ensuring every member of staff, including those who do not work directly with children, reads and understands Part One of KCSIE 2026 and receives safeguarding updates throughout the year.
- Making sure every member of staff adheres to the requirements outlined in our Safeguarding and Child Protection Policy and Procedure.
- Confirming that relevant staff are aware of and act according to data protection principles found in the Data Protection Act 2018 and UK GDPR, so they know when to share or withhold personal information appropriately.
- Putting mechanisms in place to help staff understand and carry out their safeguarding roles, as explained in KCSIE Part One.
- Appointing a senior member of the board to lead on safeguarding arrangements.
- Ensuring that all safeguarding practices align with local authority procedures and the inter-agency protocols established by Safeguarding Partners.
- Having clear policies and procedures, so action can be taken promptly to safeguard children's welfare.
- Ensuring each school operates in accordance with local inter-agency procedures.
- Reviewing and updating the Safeguarding and Child Protection Policy annually and making it available on the school website.
- Providing a Staff Code of Conduct and an IT Policy that covers Acceptable Use and Digital Safety.
- Complying with statutory guidance for Children Absent from Education, following Children Missing Education (Sep 2016) and Working Together to Improve Attendance (2024).

PARK SCHOOL

- Upholding the Prevent Duty principles
- Requiring schools to keep more than one emergency contact number for each child, with regular reviews of this information.
- Ensuring schools record names, addresses, and telephone contacts for everyone with Parental Responsibility for a student.
- Requiring schools to inform the local authority whenever a child is removed from the roll, in line with statutory and local guidance.
- Monitoring all children's attendance, particularly those with unexplained or persistent absences, children missing from education, and those on sponsored visas (reporting changes as required to the UKVI department).
- Making sure every staff member completes safeguarding and child protection training at induction (including online safety, expectations, roles, and responsibilities for filtering and monitoring), in line with Safeguarding Partners' advice.
- Recognising the expertise that staff develop through regular training and by handling safeguarding concerns daily.
- Ensuring appropriate filtering and monitoring systems are in place to keep students safe online, meeting DfE standards, and considering the size and age range of pupils, the proportion at increased risk, frequency of system use, and balancing costs with safeguarding risks.
- Maintaining robust security procedures to protect systems, staff, and learners, with regular reviews to stay ahead of cyber threats.
- Ensuring that safeguarding education, including online safety, is taught to all pupils.
- an annual review of safeguarding arrangements, which includes a written report presented to the Governing Body.

High-quality training is essential for staff to effectively safeguard children. During induction, all newly employed school staff including those in governance roles must be given and must read:

- KCSIE 2026 – Part One and Annex B for all staff
- This Safeguarding and Child Protection Policy
- The Code of Conduct
- IT/AI Policies
- Social Media Policy
- Children Absent from Education and Attendance Policy
- Anti-Bullying Policy
- Behaviour Policy
- Preventing Extremism and Radicalisation Policy
- EYFS Framework (where applicable)

New hires must also be made aware of the names and responsibilities of the DSL and DDSLs. Furthermore, all new staff and agency or supply staff should be reminded that personal mobile phones or devices must never be used on school premises where children are present. They are also required to wear the designated staff-coloured lanyard at all times while on site.

All staff members working in school are required to attend in-person annual safeguarding and child protection training led by the DSL, typically at the start of the academic year. This training is supplemented by any additional presentations or materials prepared by the DSL for the school. In addition all schools should receive training by the local authority every three years.

Agency, supply, or peripatetic teaching staff must provide evidence of completing Basic Safeguarding training before their first day at the school and must receive a Safeguarding Induction before having any contact with pupils. DSLs and DDSLs are required to complete DSL level training at least every two years, preferably through their local authority when possible.

To keep current in their roles, DSLs should also stay updated through informal means—such as e-bulletins, networking with other DSLs in person or online, or reviewing new safeguarding developments at regular intervals and at least annually. All DSLs are expected to attend Forfar Safeguarding Hub meetings.

Violence Against Women and Girls (VAWG)

The proprietor recognises the government's national focus on tackling violence against women and girls. The school will actively challenge misogyny, sexism, sexual harassment, harmful stereotypes and abusive behaviours through its culture, curriculum, staff training and safeguarding procedures. Any concerns relating to violence against women and girls will be addressed promptly and proportionately.

2.5 Safer Recruitment

Headteachers, DSLs, and other staff directly involved in recruitment must complete Safer Recruitment training every two years. All staff employed by the school must complete online Prevent training annually. All staff with student contact must complete online FGM training. The Designated Teacher for Looked After Children must complete relevant training every three years. All staff with direct contact with students are required to complete Online Safety training annually, which is centrally organised by the Forfar IT team. We place strong emphasis on safer recruitment within our school as a fundamental part of protecting children from harm. All statutory procedures for verifying the suitability of staff and volunteers working with children are strictly followed, as outlined in our Safer Recruitment Policy.

Online searches must be carried out for all shortlisted candidates in accordance with KCSIE requirements. Searches must be completed before interview wherever possible and any concerns explored as part of the recruitment process. Schools should maintain a documented approach explaining how searches are conducted, recorded and evaluated.

Schools must ensure regulated activity determinations remain compliant with current DBS and safer recruitment guidance and any updates arising from KCSIE 2026.

Updates and CPD

Staff will also receive ongoing child protection and online safety training throughout the year. This ensures everyone maintains up-to-date knowledge and skills needed to keep children safe. The safeguarding team at each school determines the format and content of these resources, presentations, or training sessions.

Third-party contractors

It is considered best practice for third-party contractors who work regularly in schools and may have contact with pupils to complete Basic Safeguarding training at a level appropriate to their duties. This

training should be organised by their own employers rather than by the school. All contractors should receive the relevant safeguarding policies to read.

Information Sharing

Sharing information is essential for identifying and addressing all types of abuse, neglect, or exploitation. Concerns about sharing information must never prevent staff from acting to safeguard and promote children's welfare and safety. This policy follows the principles and recommendations set out in the UK government's Information Sharing guidance (2024).

The Data Protection Act (2018) and GDPR do not prohibit the sharing of information when it is necessary to keep children safe. "Safeguarding of children and individuals at risk" is a valid legal basis that allows schools to share sensitive personal data, including with external agencies, even without parental consent if there is a justified reason to do so and if it will enhance a child's safety in a timely fashion. It is appropriate to share information without consent if: consent cannot be obtained; it would not be reasonable to expect a safeguarding practitioner to obtain consent; or seeking consent could put a child at risk.

As such, school staff should take the initiative to share information as soon as possible whenever concerns arise about a child's safety or welfare, whether issues are just emerging or the child is already known to children's social care services.

2.6 Policy Review

This policy undergoes an annual review conducted by the Group Safeguarding Lead/DSL. After each update, the policy is distributed to all staff with ongoing training provided throughout the year to maintain awareness and support continuous learning. It will be updated throughout the year if new updates come through.

Human Rights Act 1998

The Human Rights Act 1998 (HRA) outlines the basic rights and freedoms that everyone in the UK is entitled to, incorporating the Articles and protocols of the European Convention on Human Rights (ECHR) into UK law. This means public organisations, including schools, have a legal duty to uphold and protect individuals' rights when making decisions that affect them. Acting in a way that goes against the Convention is unlawful for schools.

Some of the key Convention rights relevant to schools include:

- Article 3: The right to be free from inhuman or degrading treatment (an absolute right)
- Article 8: The right to respect for private and family life (a qualified right), which includes safeguarding an individual's physical and psychological well-being
- Article 14: The right to enjoy all the rights and freedoms in the Act without discrimination
- Protocol 1, Article 2: The right to education

Experiencing harassment, violence, or abuse including sexual harassment could violate one or more of these rights, depending on the situation.

Equality Act 2010

The Equality Act requires schools to ensure that pupils are not unlawfully discriminated against on the basis of sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation. These are known as protected characteristics. While every protection is vital, safeguarding guidance and legal duties in schools place particular focus on supporting students in relation to certain protected characteristics, especially disability, sex, sexual orientation, gender reassignment, and race.

The Act also gives schools the power to take positive action, if it is reasonable and proportionate, to address specific disadvantages experienced by students with particular protected characteristics. For instance, this could involve making reasonable adjustments for disabled pupils, including those with chronic health conditions, or implementing targeted support for girls if there is evidence they are disproportionately affected by sexual violence or harassment.

To help schools understand and meet their obligations, official guidance is available at Equality Act 2010: advice for schools - GOV.UK (www.gov.uk), along with further support from the Equality and Human Rights Commission (equalityhumanrights.com).

Public Sector Equality Duty

The Public Sector Equality Duty (PSED) is found within the Equality Act. The PSED places a general duty on schools to have, in the exercise of their functions, due to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.

Safeguarding and child protection policies, as well as the knowledge base in schools, are grounded in the United Nations Convention on the Rights of the Child, established in 1989, which provides an international legal framework for these practices.

Specific legal context (not limited to)

- Children Act (1989; 2004)
- Children and Social Work Act (2017)
- Sexual Offences Act (2003)
- Domestic Abuse Act (2021)
- Equality Act (2010)
- Police and Criminal Evidence Act (1984)
- Human Rights Act (1998)
- Education Act (2002)

PARK SCHOOL

- The Relationships Education, Relationships and Sex Education and Health Education (England) Regulations (2019), made under sections 34 and 35 of the Children and Social Work Act (2017)
- Health and Care Act (2022)
- Online Safety Act (2023)
- Children and Families Act (2014)

Related documentation

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

National government guidance documents (UK):

- The Education (Independent School Standards) Regulations (2014)
- Keeping Children Safe in Education (KCSIE) (2026)
- Working Together to Safeguard Children (2023)
- Working Together to Improve Attendance (2024)
- Prevent Duty Guidance: for England and Wales (2023)
- Disqualification under the Childcare Act (2018)
- What do to if you are worried a child is being abused – Advice for practitioners (2015)
- Early Years Foundation Stage Framework (2025)
- Use of Reasonable Force, Restrictive Interventions and Restraint (2025)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2025)
- Gender Questioning Children (2023, revision pending)

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

2.7 Teaching children about safeguarding

The school is committed to proactively teaching children about safeguarding, including online safety, as part of our approach to offering a broad, balanced and inclusive curriculum. Children need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships. High quality, evidence-based teaching of relationships, sex and health education (RSHE) can help prepare children for the opportunities and responsibilities of adult life, and can promote their moral, social, mental and physical development. Effective teaching will support young people to cultivate positive characteristics including resilience, self-worth, self-respect, honesty, integrity, courage, kindness, and trustworthiness. Effective teaching will support prevention of harms by helping young people understand and identify when things are not right.

Relationships education compulsory for all pupils receiving primary education and relationships and sex education (RSE) compulsory for all pupils receiving secondary education. Personal, social, health and economic education (PSHEE) continues to be compulsory in independent schools. The government RSHE guidance is to be implemented on 1st September 2026.

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

Safeguarding themes are embedded throughout our curriculum and reinforced through targeted lessons, assemblies, and themed events. The content is tailored appropriately for each key stage and year group, ensuring it is age-appropriate and responsive to the needs of our pupils.

- In Early Years and Key Stage 1, the focus is on recognising trusted adults, understanding personal boundaries, and developing the language to express feelings and concerns.
- In Key Stage 2, pupils learn about online safety, respectful relationships, and understanding risks in both the physical and digital worlds.
- In Key Stage 3, 4 and 5 the curriculum further develops pupils' understanding of consent, healthy relationships, exploitation, mental health, and the law. Pupils are also supported to understand and challenge peer pressure, discrimination, and harmful behaviours.

Relationships education is compulsory in all primary schools.
Our approach to this is to deliver it through a structured PSHE (Personal, Social, Health and Economic) curriculum that builds progressively each year. We focus on friendships, families, respecting others, and staying safe, including online. Our teaching supports children to develop positive relationships based on mutual respect, kindness, and care, in line with statutory guidance and our school's values.

Relationships and sex education (RSE) is compulsory in all senior schools.
Our approach to this is to provide a comprehensive and inclusive RSE programme that promotes healthy, respectful relationships, consent, sexual health, and the emotional and social aspects of growing up. The curriculum is age-appropriate, evidence-based, and reflects the diverse needs of our pupils. It is delivered through PSHE lessons, tutor time, and additional input from external specialists where appropriate. Parents are informed of the content and are given the opportunity to discuss any aspects of the programme. The curriculum will explicitly address consent, respectful relationships, misogyny, online influence, misinformation, disinformation, conspiracy theories, image-based abuse, deepfakes, nudification technology, coercive behaviour and violence against women and girls in an age-appropriate manner. Pupils will be taught how to critically evaluate online content, understand the implications of AI-generated material and seek support where concerns arise.

<u>Parents</u>

The school actively involves parents, ensuring they are informed about the RSHE curriculum and consulted during the development and review of the RSHE Policy. Parents are given access to a representative selection of teaching materials in advance, supporting continued discussions at home and allowing them to view all curriculum resources upon request. Additional initiatives may include inviting parents into the school to discuss curriculum topics and the significance of RSHE for wellbeing and safety, providing opportunities for questions, and offering guidance to help parents navigate conversations about RSHE with their children. +The school teaches all statutory requirements and works in partnership with parents and pupils if additional support is required.

Resources

- 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 children 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

2.8 Online Safety

Technology plays a significant role in enabling potential risks to children. All staff should recognise that online safety presents unique challenges, with technology often at the core of safeguarding and wellbeing concerns.

While certain responsibilities can be delegated to other safeguarding team members or qualified staff, it remains the Designated Safeguarding Lead's (DSL) duty to oversee online safety within the school. This includes a thorough understanding of the school's filtering and monitoring systems. DSLs must also ensure staff are well-informed about key issues such as filtering and monitoring, cyberbullying, child sexual and criminal exploitation, radicalisation, sexually coerced exploitation, and sexual predation, including online grooming.

Areas of risk

There are four main categories of risk associated with technology and online safety:

- Content: Exposure to illegal, inappropriate, or harmful material such as pornography, racism, misogyny, content promoting self-harm or suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news), and conspiracy theories.
- Contact: Harmful online interactions with others, for example, peer pressure, commercial advertisements, or adults pretending to be children or young people with the intent to groom or exploit for sexual, criminal, financial, or other reasons.
- Conduct: Personal online behaviour that increases the risk of or causes harm, such as creating, sending, or receiving explicit images (including consensual and non-consensual sharing of nudes, semi-nudes, and pornography), as well as sharing other explicit material and engaging in online bullying.
- Commercial: Risks involving online gambling, inappropriate advertising, phishing, or financial scams (including sexually coerced exploitation). If pupils, students, or staff are at risk, please report to the Anti-Phishing Working Group (https://apwg.org/), CEOP, or the IWF.

Online risks include AI-generated content, nudification applications, deepfake technology, synthetic sexual imagery, disinformation, misinformation, conspiracy theories and image-based abuse. Schools must recognise that emerging technologies can facilitate exploitation, harassment, bullying, fraud, radicalisation and abuse. Staff must receive regular updates regarding these emerging risks.

Annual risk assessment

Given the rapidly evolving nature of technology and its associated risks, the school conducts a thorough review of its online safety approach every year. This review is supported by an annual risk assessment, designed to identify and address the specific online risks faced by our students.

Resources such as the 360 Safe website or the LGfL online safety audit may be used to inform this process.

Filtering and Monitoring

To fulfil their responsibility of safeguarding children and ensuring a secure learning environment at every stage of development, school leaders and governing bodies must take reasonable steps to minimise students' exposure to online risks through the school's IT systems.

To achieve this, robust filtering and monitoring mechanisms are in place and overseen by central IT. These teams ensure that each school maintains effective cybersecurity protocols and regularly review these procedures, typically on an annual basis to keep pace with technological changes and evolving online threats

National cyber security standards, designed to strengthen schools' defences against cyber-attacks, are used to benchmark and improve our digital resilience. The suitability of filtering and monitoring systems is also partly determined by risk assessments required under the Prevent duty.

We use government self-assessment tools, such as 'Plan technology for your school - GOV.UK', to evaluate our filtering and monitoring standards and make updates as necessary. This is in conjunction with Forfar HQ IT.

Regarding new technologies like generative AI, we follow established safety guidelines to ensure its secure use in education, in line with filtering and monitoring expectations. For further information on our approach to artificial intelligence, please refer to the Digital Technology Policy

It's important that while effective filtering and monitoring are in place, these systems do not inadvertently restrict valuable educational content or hinder online learning. School leaders and relevant staff stay informed about our digital safety measures, manage these systems responsibly, and know how to escalate any concerns that arise. All staff are required to recognise their role in preventing, identifying, and responding to risks associated with digital technology.

We also recognise that many students can access the internet freely on their own devices via mobile data (such as 3G, 4G, or 5G) while at school. This can sometimes result in risks like child-on-child sexual harassment, sharing of explicit images (both consensually and non-consensually), and exposure to harmful material. In these instances, schools will work closely with parents to address and respond to concerning online behaviours as needed.

Students are not permitted to have their mobile phones with them during the school day, this measure minimises the usage of personal devices. Students sign a safe usage agreement and are taught about the acceptable use of the internet at school. Any incidents are treated seriously and responded to in line with our behaviour and acceptable usage policies.

Filtering and monitoring systems will be formally reviewed at least annually and whenever significant changes occur to the school's technology provision. The review will be documented and reported to governors/proprietors. The school will ensure clear allocation of responsibility for filtering and monitoring oversight, incident review, escalation and staff training. All staff must understand their role in relation to filtering and monitoring arrangements.

Children

Children will be taught about how to keep themselves safe online, including being aware of potential risks within the curriculum in an age-appropriate way.
Through assemblies and PSHEE sessions the students are aware of dangers online and challenged to question how they know sources are reliable. Children discuss how they access the online world and are supported to understand how to gain support, keep themselves safe and ensure a healthy outlook on their usage.

Parents/Guardians

The school actively communicates with parents and guardians to emphasise the importance of online safety for children. We help parents understand the filtering and monitoring systems used within our school and provide regular updates about students' online activities in school.

Additional information to support schools to keep their children safe online (including when they are online at home) is provided in KCSIE (2026).

Child's Voice

We are committed to building resilience and creating a culture where every child knows our school is a place where concerns, whether for themselves or others, can be voiced openly and confidently. To help children know how to seek help, we have put in place a range of measures that make it clear how they can express any concern they might have.

This includes pupil voice survey's; small Group feedback opportunities, the use of Whisper anonymous reporting tool (Year 5- Year 13); iReflect weekly check in questionnaire (year 7-11).

Artificial Intelligence, Deepfakes and Image-Based Abuse

The school recognises the increasing safeguarding risks associated with generative artificial intelligence. These risks include AI-generated child sexual abuse material, deepfakes, nudification tools, synthetic intimate imagery, impersonation, extortion, harassment and misinformation. The creation, possession, sharing or storage of any sexually explicit AI-generated image appearing to depict a child will be treated as a serious safeguarding matter and may constitute a criminal offence. Any concern involving AI-generated sexual content, image manipulation or image-based abuse must be referred immediately to the DSL and managed in line with safeguarding, disciplinary and criminal procedures where required. Pupils will be taught how AI technologies can be used safely, ethically and lawfully.

2.9 Categories of Abuse

The words maltreatment and abuse are commonly used to describe a range of harmful experiences a child may suffer, including abuse, neglect, or exploitation. It is important that all staff remain vigilant and informed about the signs that could indicate a child is at risk. Early recognition depends on professional curiosity and the ability to notice when something may not be right. Prompt action can make a significant difference in safeguarding a child.

Children can be harmed in different ways, either through:

- direct actions that cause injury or suffering, or
- inaction that allows harm to occur when it could have been prevented.
- Such harm might happen in various environments:
- within the home, in care settings, or in the wider community,
- through online platforms or digital tools that enable real-world abuse,
- by someone familiar to the child or, less frequently, a stranger,
- by adults or by other children.

It's important to recognise that abuse rarely occurs in isolation. Often, different types of harm are interconnected and don't fit neatly into a single category. Despite this complexity, most safeguarding frameworks organise abuse into four broad categories: **physical abuse**, **emotional abuse**, **sexual abuse**, and **neglect** (*Working Together to Safeguard Children*, 2023). They are as follows:

<u>Physical Abuse</u>

Physical abuse involves the deliberate infliction of physical harm on a child. This may include actions such as hitting, shaking, throwing, poisoning, burning, scalding, drowning, or suffocating. It also includes situations where a parent or guardian causes harm by fabricating or deliberately inducing illness in a child.

Potential indicators of physical abuse may include:

- Injuries in areas where accidental harm is less likely, such as the thighs, back, or abdomen
- Breathing difficulties resulting from suffocation, drowning, or exposure to toxic substances
- Injuries that are left untreated or are inadequately treated
- Bruises that resemble hand or finger marks, or those caused by an object
- Burns from cigarettes, human bite marks
- Visible scars, burns, or scalds

Recognising these signs early can be critical in protecting a child from ongoing harm.

<u>Emotional abuse</u>

Emotional abuse refers to the ongoing emotional mistreatment of a child, which can have a significant and lasting impact on their emotional wellbeing and development. This form of abuse can take many shapes, such as making a child feel unloved, worthless, or inadequate, or treating them as valuable only when they meet someone else's needs.

It may also involve denying the child the chance to express their thoughts and feelings through silencing, ridicule, or constant criticism. Emotional abuse can include imposing expectations that are inappropriate for the child's age or stage of development. This might involve demanding behaviours

beyond their capability, excessive control, restricting their ability to explore or learn, or isolating them from normal social interactions.

Additionally, emotional abuse may involve the child witnessing the mistreatment of others, such as domestic abuse, or being subjected to ongoing bullying including online bullying which leaves them feeling scared, threatened, or unsafe. In some cases, it may also involve manipulation, exploitation, or corruption.

While emotional abuse can occur on its own, it is often present to some degree in most forms of child maltreatment.

Sexual abuse

Sexual abuse occurs when a child or young person is coerced, manipulated, or persuaded into taking part in sexual activities. This can happen whether or not the child understands what is taking place and may not always involve physical force or violence.

Sexual abuse can include contact activities such as:

- Penetrative acts (e.g., rape or oral sex)
- Non-penetrative acts like kissing, touching, rubbing, or masturbation—whether over or under clothing

It also includes **non-contact forms**, such as:

- Exposing a child to sexual images or videos
- Involving them in the creation of sexual content
- Encouraging sexually inappropriate behaviour
- Grooming the child for future abuse

Abuse can occur both **offline and online**, with technology often used to exploit or manipulate children.

Sexual abuse is not limited to adult male perpetrators. It can also be committed by women or by other children.

Possible signs of sexual abuse may include:

- Pregnancy
- Sexually transmitted infections or diseases
- Pain, bruising, itching, bleeding, or discharge from the genital area, anus, or mouth
- Frequent urinary infections
- Difficulty walking, sitting, or standing
- Persistent sore throats or stomach aches
- Sexualised behaviour or language that is not appropriate for the child's age
- Re-enacting sexual acts using toys, objects, or other children
- Sudden reluctance—or eagerness—to undress
- Being unusually familiar with adults or displaying no caution around strangers
- Avoidance of specific individuals (though note that some children may continue to show affection toward an abuser, particularly if they are young or have learning or developmental differences)
- Bedwetting after being previously dry
- Soiling or smearing behaviour

PARK SCHOOL

Recognising these signs and acting on them promptly is essential in safeguarding children from further harm.

Neglect

Neglect is a form of abuse that involves the ongoing failure to meet a child's basic physical or emotional needs, which can significantly harm their health, wellbeing, or development.

Neglect can begin even before birth for example, as a result of substance misuse during pregnancy. After birth, it may take the form of a parent or guardian failing to:

- Provide adequate food, clothing, or safe shelter (including cases where a child is abandoned or excluded from the home)
- Protect the child from physical or emotional harm
- Offer proper supervision, or relying on unsuitable caregivers
- Ensure the child has access to necessary medical care or treatment
- Neglect can also include a lack of emotional support or failure to respond to a child's emotional needs.

Signs that may indicate neglect include:

- A child being significantly underweight, small for their age, or showing sudden weight loss
- A child being excessively overweight for their age
- Wearing clothes that are inappropriate for the weather, or consistently being poorly dressed
- Frequent, unexplained absences from school or regularly arriving late
- Being left alone for long periods or having to care for younger siblings without support

Identifying and responding to signs of neglect is crucial in preventing long-term harm and promoting a child's safety and development.

Domestic abuse

Children can be directly and indirectly affected by domestic abuse. They may witness or overhear abusive behaviour at home or experience the emotional and physical effects of it. In some cases, children may be subjected to abuse in their own intimate relationships, such as in teenage dating scenarios.

Domestic abuse can involve a single incident or a repeated pattern of behaviour, including controlling, coercive, threatening, or violent acts. It occurs between individuals aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexual orientation. Abuse can take many forms, psychological, physical, sexual, financial, or emotional.

Exposure to domestic abuse can have serious and lasting impacts on a child's emotional wellbeing, physical health, development, and learning. Some children may internalise blame for the abuse or may be forced to leave their home due to unsafe conditions.

The Domestic Abuse Act 2021 provides the first statutory definition of domestic abuse and formally recognises children as victims in their own right when they see, hear, or are otherwise affected by

such abuse. According to the Act, both the perpetrator and the victim must be aged 16 or older and "personally connected," as defined in Section 2 of the legislation.

Operation Encompass is a partnership initiative used by **some** police forces across England to support children and families affected by domestic abuse. It facilitates timely communication between police and schools to ensure children receive the right emotional and practical support as early as possible.

When police attend a domestic abuse incident where children are present or live in the household, they will notify the school's Designated Safeguarding Lead (DSL) before the start of the next school day. This early sharing of information allows the school to respond appropriately and provide immediate support tailored to the child's needs.

Operation Encompass works **alongside** statutory safeguarding processes and does not replace them. Where there are ongoing concerns about a child's safety or wellbeing, schools and/or the police should make a referral to **Children's Social Care** in line with local safeguarding procedures.

Additionally, Operation Encompass offers a dedicated advice and support helpline for education staff who have concerns about children exposed to domestic abuse. The helpline is open Monday to Friday, from 8am to 1pm, and can be reached on 0204 513 9990 (calls are charged at local rate).

National Domestic Abuse Helpline

Refuge operates the National Domestic Abuse Helpline, offering free and confidential support 24 hours a day. The helpline can be reached on 0808 2000 247.

The Refuge website provides comprehensive information, advice, and resources for individuals experiencing domestic abuse, as well as for those concerned about the safety of a friend or loved one. The site also includes a discreet online form, allowing users to request a safe time for a call from the support team.

Child on Child Abuse

Child-on-child abuse refers to any form of abuse or exploitation where the perpetrator and victim are both children. It is essential to recognise that abuse is abuse regardless of the age of those involved and must be treated with the same seriousness as abuse or exploitation perpetrated by adults.

All staff have a duty to:

- Remain vigilant to signs that may suggest child on child abuse and understand their role in preventing, identifying, and responding to such concerns.
- Recognise that the absence of reports does not mean abuse is not occurring; it may simply be unreported.
- Understand that children can, and do, abuse other children including within intimate relationships.
- Avoid minimising abusive behaviour by dismissing it as normal adolescent behaviour, 'banter', or 'just a laugh'. All concerns must be taken seriously and acted on promptly.

The school recognises that violence against women and girls can begin in childhood and adolescence. Sexual harassment, misogynistic language, coercive behaviour, image-based abuse, online harassment, controlling behaviours and discriminatory attitudes will be challenged

proactively. Educational approaches, behaviour systems and safeguarding procedures will reinforce respectful relationships and clear expectations regarding conduct

Forms of child-on-child abuse may include, but are not limited to:

- Bullying (including online or cyberbullying)
- Relationship abuse
- Domestic abuse between young people
- Child sexual exploitation
- Youth violence and serious youth violence
- Upskirting
- Harmful sexual behaviour
- Gender-based violence
- Forcing another child to engage in sexual acts without consent, such as undressing, touching themselves sexually, or participating in acts with a third party
- Sexual violence (e.g. rape, assault by penetration, or sexual assault including incidents involving online elements that enable or encourage such abuse)
- Sexual harassment (including inappropriate comments, jokes, or online messages; may occur in isolation or as part of a wider pattern)
- Sharing of nudes or semi-nudes both consensual and non-consensual
- Financially motivated sexual extortion
- Creating or distributing AI-generated child sexual abuse material

These types of abuse often overlap with other safeguarding concerns and rarely happen in isolation. It's also important to recognise that a child who harms others may simultaneously be experiencing abuse themselves.

2.10 Protected Characteristics

While all children must be protected from harm, staff must be aware that some children face a greater risk and may require early help and targeted support. Children with certain characteristics or circumstances may be more vulnerable to abuse, neglect, or exploitation including online harm. Children with protected characteristics under the Equality Act 2010 (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation) may be at increased risk of discrimination or harm and must be actively safeguarded.

Child-on-child abuse is often driven by prejudice or discrimination toward certain groups. This may be based on a child's race, religion, gender, sexual orientation, gender identity, special educational needs, disability, or personal circumstances such as being in care, adopted, or having caring responsibilities.
Such abuse may arise from genuine differences between children or from perceived differences, and can manifest in physical, verbal, or emotional forms.

All incidents of child-on-child abuse related to protected characteristics must be treated with the utmost seriousness and addressed promptly and appropriately to ensure every child feels safe, respected, and valued.

2.11 When does behaviour become abuse / exploitative?

Distinguishing between inappropriate behaviour and behaviour that constitutes abuse, or exploitation can sometimes be challenging. When in doubt, concerns should always be addressed using the safeguarding procedures outlined below.
Certain factors may suggest that behaviour is abusive or exploitative, including:

- Repetition and intent – if the behaviour is repeated over time or there is clear intent to cause harm
- Coercion or planning – if the behaviour involves manipulation, pressure, or has been premeditated
- Power imbalance – if one child holds more power over another due to age, size, social standing, or economic advantage

This list is not exhaustive. Staff must use their professional judgment and raise any concerns with the Designated Safeguarding Lead (DSL), who should seek advice from the Group Lead Safeguarding if necessary.

<u>How Can Staff Identify Victims of Child-on-Child Abuse?</u>

Recognising child-on-child abuse requires vigilance and awareness of changes in a child's behaviour, wellbeing, or appearance. Many of the signs associated with this type of abuse also overlap with indicators of other forms of abuse, neglect, or exploitation.

Possible signs that a child may be experiencing child-on-child abuse include, but are not limited to:

- Unexplained, frequent, or prolonged absences from school
- A noticeable decline in academic performance or engagement in class
- Physical injuries with inconsistent or unclear explanations
- Struggles with mental health or emotional wellbeing, such as withdrawal, increased anxiety, panic attacks, frequent headaches or stomach aches, sleep disturbances, or excessive sleeping
- Signs of drug or alcohol use, especially if new or escalating
- Significant changes in appearance or behaviour, including age inappropriate or sexualised behaviour
- Health-related concerns such as sexually transmitted infections (STIs) or signs of an unplanned pregnancy
- Shifts in friendship groups or increased isolation
- Avoidance of specific areas within school or the local community
- Reluctance to return home or expressions of fear about certain environments

This list is not exhaustive, and the presence of one or more of these signs does not automatically indicate that a child is experiencing child-on-child abuse or sexual exploitation. Staff must use their professional judgement and raise any concerns with the Designated Safeguarding Lead (DSL) for further guidance and action.

<u>Are Some Children More Vulnerable to Child-on-Child Abuse?</u>

While any child can be affected by child-on-child abuse or exploitation, research indicates that certain groups may be more vulnerable.

- Prevalence by age: Child-on-child abuse is more commonly reported among children aged 10 and above, although it can also occur in younger children, particularly in the form of harmful sexual behaviour.
- Increased vulnerability: Children may be more at risk of experiencing or engaging in abuse or exploitation if they have:
    - Witnessed or been victims of abuse, violence, or exploitation
    - Experienced the loss of a close family member or friend, whether recently or in the past
    - Faced significant disruption or instability in their lives, such as frequent moves, changes in care, or family breakdown

- Protected characteristics: Children with protected characteristics especially those with special educational needs or disabilities (SEND) and those who identify as LGBTQ+ or are gender-questioning/transitioning are more likely to be targeted, often through direct or online bullying.

Children who lack a trusted adult to confide in are particularly at risk, as they may feel isolated or unable to report abuse. The school is committed to recognising and reducing these additional vulnerabilities by providing a safe, supportive environment and ensuring that all children, particularly those from higher risk groups, have access to trusted adults and feel empowered to speak up about any concerns.

How Does the School Raise Awareness of and Reduce the Risk of Child-on-Child Abuse?

The school takes a proactive approach to preventing and addressing child-on-child abuse through staff training, education, and the promotion of a respectful and inclusive school culture.

- Staff training: All staff receive training on the nature, prevalence, and impact of child-on-child abuse. This includes guidance on how to prevent, recognise, and respond to incidents effectively and sensitively.
- Creating a safe culture: The school actively challenges harmful attitudes and behaviours that contribute to abuse, promotes tolerance and respect, and ensures that incidents of child-on-child abuse, including bullying and cyberbullying, are dealt with promptly, fairly, and appropriately.
- Student education: Children are educated on the nature, impact, and prevalence of child-on-child abuse through PSHE lessons, assemblies, restorative conversations, workshops, form time discussions. They are informed of:
    - What to do if they experience or witness abuse
    - The impact abuse can have on victims
    - The reasons why such behaviours occur, including the potential vulnerabilities of the perpetrator
- Zero-tolerance approach: Students are regularly reminded of the school's zero-tolerance policy towards all forms of bullying and child-on-child abuse, including sexual harassment and sexual violence.

This combined approach ensures that both students and staff are aware, informed, and equipped to create a safe and supportive school environment.

Child-on-Child Abuse: Sexual Violence and Sexual Harassment

Two specific forms of child-on-child abuse are sexual violence and sexual harassment. These behaviours exist along a continuum and may overlap. They can take place in person or online, and may involve physical, verbal, or non-verbal actions. Regardless of the setting or form, such behaviour is never acceptable.

Sexual violence and harassment can occur anywhere, including within school environments. As such, all staff should adopt a mindset of "it could happen here." Assume that it might be taking place and be prepared to respond appropriately. A lack of reports does not mean incidents are not happening; they may simply be unreported.
Staff should also be aware of the potential for intra-familial harm and consider any additional support needed for siblings following an incident involving sexual harassment or violence.

Children who experience sexual harassment or sexual violence may find the experience deeply traumatic and distressing, which can negatively impact their mental health, emotional wellbeing, and academic performance especially if the alleged perpetrator remains in the same school.

It is vital that schools take a broad view of sexual harassment. When left unchallenged, it can foster a culture in which inappropriate behaviour is normalised, increasing the risk of more serious abuse such as sexual violence. A proactive approach to prevention, education, and intervention is essential to maintaining a safe and respectful learning environment.

<u>Sexual Violence: An Overview</u>

Sexual violence refers to a range of serious criminal offences that involve sexual activity without consent. These behaviours are unlawful and deeply harmful, and schools must take all disclosures seriously.
Key examples of sexual violence include:

- Rape: When someone intentionally penetrates another person's vagina, anus, or mouth with their penis without that person's consent, and without reasonably believing they have consent.
- Assault by Penetration: When someone uses any part of their body or an object to penetrate another person's vagina or anus, and the act is sexual, non-consensual, and done without a reasonable belief that the other person has consented.
- Sexual Assault: When someone intentionally touches another person in a sexual way without consent, and without reasonably believing they have consent. This can include a broad range of actions from inappropriate touching to more severe assaults. Even a single act, such as kissing someone or touching their private areas without consent, is considered sexual assault.

It is essential that all school staff understand that any form of non-consensual sexual behaviour is serious, regardless of the perceived severity, and must be responded to in line with safeguarding procedures.

Sexual Harassment refers to 'unwanted conduct of a sexual nature'. Sexual harassment can take place both online and offline and may include a wide range of inappropriate behaviours.
Online examples include (but are not limited to):

- Sharing sexual images or videos without consent
- Making sexually explicit comments on social media or in messages

Offline examples include (but are not limited to):

- Making sexualised remarks, taunts, or so called 'jokes'
- Unwanted physical contact, such as deliberately brushing against someone

- Interfering with another person's clothing in a sexual or inappropriate manner

All of these behaviours are unacceptable and must be addressed promptly as part of the school's safeguarding response.

Upskirting

Upskirting refers to the act of taking a photo or video under a person's clothing without their knowledge or consent, typically with the intention of viewing their genitals or buttocks (with or without underwear). This behaviour may be carried out to gain sexual gratification or to cause humiliation, distress, or alarm.
Upskirting is a criminal offence under the Voyeurism (Offences) Act 2019, which came into force on 12 April 2019. Anyone regardless of gender or sexual orientation can be a victim or perpetrator of this offence.

Who Can Perpetrate Sexual Violence and/or Harassment?

Sexual violence and sexual harassment can be carried out by any child and may take many forms. It is important to understand that:

- It can occur between two individuals or involve a group targeting another individual or group
- A child of any age can perpetrate abuse against another child, regardless of the victim's or perpetrator's age
- It can occur between children of any sexual orientation
- The behaviour often exists on a continuum, ranging from seemingly minor acts to serious offences, and may escalate or overlap
- It can happen both online and offline, including verbal, written, or physical interactions
- It can occur within intimate or personal relationships between children

Understanding these dynamics helps ensure that all reports are taken seriously, and appropriate support and safeguarding measures are put in place.

Certain groups of children may be at greater risk of abuse and may face additional barriers to recognition and disclosure. For example, children with Special Educational Needs (SEND) may struggle to communicate their experiences or be more easily overlooked. Similarly, children who are LGBTQ+, perceived to be LGBTQ+, or are gender-questioning may also be more vulnerable to abuse or exploitation.

Signs and Indicators of Potential Abuse

All staff should remain alert to possible warning signs that a child may be at risk. Indicators can vary, but may include:

- Frequent or unexplained absences from school, including truancy or going missing
- Changes in friendships or forming relationships with significantly older peers or groups
- A noticeable decline in academic performance or engagement in school
- A significant change in appearance, behaviour, or personal presentation
- Evidence of self-harm, suicidal thoughts, or a general decline in emotional wellbeing
- Unexplained injuries or signs of physical assault
- Possession of gifts or items that cannot be easily explained

While these signs do not automatically indicate abuse, they should always prompt further consideration and, where appropriate, be discussed with the Designated Safeguarding Lead (DSL).

The school follows the principles outlined in relevant safeguarding guidance when addressing incidents of sexual violence and sexual harassment between children. Our approach is rooted in prevention, early intervention, and the creation of a safe, respectful environment for all pupils.

At this school, we are committed to the following:

- Zero tolerance: We do not accept or tolerate any form of sexual violence, sexual harassment, or upskirting.
- Challenging harmful attitudes: We will never dismiss such behaviour as "banter." These views risk normalising abuse and contribute to a culture where children may feel unable to speak up.
- Early intervention: Staff are encouraged to address concerning behaviour at the earliest opportunity to prevent escalation.
- Addressing physical misconduct: We will challenge inappropriate physical behaviour, including grabbing private parts, pulling down clothing, flicking bras, or lifting skirts recognising these actions may be criminal in nature.
- Challenging inappropriate language: We will not tolerate verbal abuse, including sexist remarks, sexualised jokes, innuendo, or taunting.
- Consistent disciplinary action: We will apply sanctions in line with the school's Behaviour Policy for any inappropriate behaviour, including incidents involving sexual harassment or violence.
- Education and training: These issues will be addressed through staff training and embedded in our pastoral care system, equipping both staff and students with the knowledge to recognise, challenge, and prevent harmful behaviour.
- Curriculum integration: We will deliver a planned, age-appropriate programme across the curriculum covering topics such as consent, gender roles, stereotypes, equality, healthy relationships, and power imbalances.
- Pupil voice: We will create safe spaces and opportunities for children to discuss these issues openly and honestly.
- Clear reporting systems: The school will maintain accessible, trusted systems for children to report concerns, ensuring they are taken seriously and supported appropriately.
- Support for victims: We will act in the best interests of all children involved, offering reassurance and ensuring victims are supported and kept safe. Victims will never be made to feel that they are at fault or that reporting has caused a problem.
- Empowering disclosures: Where possible, victims will be given a degree of control over decisions related to investigations and support, while balancing this with the school's duty to protect them and others.
- Risk and needs assessment: The school will carry out a risk and needs assessment for both the victim and the alleged perpetrator. This may be informed by guidance from external safeguarding professionals.
- Engaging parents/guardians: We will involve the parents or guardians of both the victim and the alleged perpetrator unless doing so would place the child at additional risk.

Our approach ensures that all concerns are dealt with sensitively, proportionately, and with the wellbeing and safety of every child at the forefront.

Resources

The Harmful Sexual Behaviour toolkit from The Lucy Faithfull Foundation is designed for parents, guardians, family members and professionals, to help everyone play their part in keeping children 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 children 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 children - Stop It Now provides a guide for parents, guardians and professionals to help everyone do their part in keeping children 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.

2.12 Child Criminal Exploitation (CCE), Including Serious Violence

Child Criminal Exploitation (CCE) occurs when an individual or group takes advantage of a power imbalance to manipulate, coerce, control, or deceive a child into engaging in criminal activity. This may happen:

- In return for something the child needs or wants
- For the benefit of the perpetrator, either financially or otherwise
- Through the use or threat of violence
    - Importantly, a child may be considered criminally exploited even if the activity appears to be consensual. Exploitation often involves manipulation, and consent cannot be freely given under coercive conditions.
    - CCE may or may not involve physical contact; it can occur entirely through online or digital means.

Examples of CCE include:

- Being forced to work in illegal cannabis farms
- Committing theft, such as shoplifting or pickpocketing
- Intimidating or threatening other young people on behalf of others

It is crucial to recognise that the experiences of girls involved in criminal exploitation can differ significantly from those of boys. The warning signs may be less visible, but girls remain equally at risk, not only of criminal exploitation but also of sexual exploitation, which may occur alongside or as part of the abuse.

Indicators of CCE and Serious Youth Violence

All staff should be alert to signs that a child may be vulnerable to, at risk of, or involved in serious violence or criminal exploitation. These indicators may include:

- Unexplained or frequent absences from school, including truancy or going missing
- Changes in friendship groups, particularly involvement with older individuals or gangs
- A noticeable decline in academic performance or engagement
- A significant change in appearance, behaviour, or personal presentation
- Signs of self-harm, suicidal thoughts, or a general decline in emotional wellbeing
- Possession of gifts or new items that cannot be accounted for
- Injuries or signs of physical assault with no clear explanation

These signs do not automatically indicate exploitation, but they should always prompt further investigation and be reported to the Designated Safeguarding Lead (DSL). Early identification and intervention are key to protecting children from harm.

County Lines

A form of Child Criminal Exploitation (CCE), *County Lines* refers to the practice of coercing or manipulating children and young people into transporting drugs or money across different areas of the country.
This often involves criminal gangs exploiting children to move illegal substances or cash from urban centres to suburban, rural, market, or coastal towns. Children may be recruited through grooming, threats, or promises of money and status, and are frequently exposed to significant harm and violence.

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 children and vulnerable adults: county lines guidance'.

Child Sexual Exploitation

Child Sexual Exploitation (CSE) is a form of child sexual abuse in which a child or young person is coerced, manipulated, deceived, or exploited into engaging in sexual activity. This exploitation is often the result of a power imbalance, which may involve factors such as age, gender, sexual identity, cognitive ability, physical strength, social status, or access to money and resources.
In some cases, the abuse is exchanged for something the child needs or wants or is carried out for the financial or reputational gain of the perpetrator or others involved.
CSE can be perpetrated by:

- Individuals or organised groups
- Males or females
- Adults or other children

It can involve a single incident or a series of events and may range from opportunistic abuse to complex, organised exploitation. Methods of control can include enticement, manipulation, threats, or violence, which may be directed at the child or someone they know.
Victims may not always realise they are being exploited, apparent consent does not mean there is no abuse. CSE can take place offline, online, or through a combination of both, and does not always involve physical contact. For example, children may be exploited through the non-consensual sharing or manipulation of sexual images or videos, including those that claim to show a child, even if the content is fake.
CSE can affect any child under the age of 18, including those aged 16 and 17 who are legally able to consent to sex. It can involve both contact (penetrative and non-penetrative acts) and non-contact sexual activity.
Indicators of CSE may overlap with those of Child Criminal Exploitation (CCE) and can include:

- Having significantly older boyfriends or girlfriends
- Contracting sexually transmitted infections (STIs) or becoming pregnant
- Exhibiting behaviours or signs listed under CCE, such as unexplained gifts, missing episodes, or changes in wellbeing

It is vital that all staff remain alert to these signs and follow safeguarding procedures if they suspect a child may be at risk of, or experiencing, sexual exploitation.

Financially Motivated Sexual Exploitation ('Sextortion')

An increasing number of children are being sexually coerced and exploited for financial gain, rather than for the sexual gratification of the offender. In these cases, perpetrators who may be adults or peers, known to the child, posing as someone they know, or completely unknown target children with the intention of extorting money.

A common method involves pressuring or coercing the victim to self-generate nude or semi-nude images or videos Whether or not the child complies, the offender may then threaten to share these images or claim to have compromising material to blackmail the child into sending money. Threats often include sharing content with family members, friends, school staff, or the wider public, including via social media. This type of abuse is commonly referred to as 'sextortion', and reports of such cases have risen sharply across the country. However, it is likely that many incidents remain unreported due to fear, shame, or confusion.

This form of exploitation can have a serious impact on children's mental health, including anxiety, depression, and, in some cases, suicidal ideation.

In response, the school adopts a supportive and non-judgemental approach to children who have shared or been pressured to share nude or semi-nude images. The priority is to ensure children feel safe and able to disclose what has happened so they can access the support they urgently need.

This does not mean the school condones or accepts the behaviour as normal. Rather, it reflects a trauma-informed safeguarding approach that avoids criminalising the child, while ensuring their safety and wellbeing.

The school also recognises that some incidents may involve illegal activity and will meet its statutory safeguarding responsibilities. This includes reporting cases to the Police, Children's Social Care, or other relevant services on a case-by-case basis, following appropriate safeguarding protocols.

Sharing of nudes/semi-nude imagery/videos

This policy only covers the sharing of sexual imagery by children. Possessing, creating, sharing and distributing sexual photos and 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 DSL immediately.

Disclosures of abuse, including incidents involving sexual imagery, can occur in a range of ways. A child may choose to confide in a class teacher, the Designated Safeguarding Lead (DSL), or any trusted member of staff. Alternatively, a disclosure may be made through an established reporting system, or a concern may come to light via a friend, parent, another professional, or even directly through the Police.

Any direct disclosure from a child must always be taken seriously. Children who disclose being involved in or affected by the sharing of sexual images are often feeling ashamed, anxious, or fearful of the consequences. It's important to recognise that a child may have already tried to manage the situation on their own, and speaking to someone at school may represent a last resort. Staff must respond with sensitivity, reassure the child that they have done the right thing in coming forward, and follow safeguarding procedures without delay.

AI Generated Child Sexual Abuse Material (CSAM)

The use of Artificial Intelligence (AI) to create Child Sexual Abuse Material (CSAM) is a growing concern, with the technology advancing rapidly. Like many online safety issues, this is a global challenge that requires international awareness and action.

This policy uses the term "AI CSAM" to describe child sexual abuse imagery or video that is generated or altered using AI technology, in contrast to "real CSAM," which involves unedited, non-synthetic material.

The term "deepfake" is used widely to describe AI generated or AI altered content. In this context, the term specifically refers to partially synthetic content, real videos or images that have been manipulated using AI to create realistic but faked content. Offenders may use these tools to insert a child's face or likeness into explicit material, resulting in disturbingly realistic deepfake videos of child rape or torture. It is important to distinguish such partially synthetic content from fully synthetic videos created using text to video or text to image tools.

Key Findings from the Internet Watch Foundation (IWF):

In its most recent report, the Internet Watch Foundation (IWF) highlighted the following key developments in AI related CSAM:

- Surge in AI Generated CSAM: Over 3,500 new AI generated child sexual abuse images have been found on a dark web forum, with figures continuing to rise since October 2023.

- Increased Severity: A growing number of these AI generated images depict Category A abuse, the most severe classification, showing offenders' increasing ability to create highly graphic and complex content.
- Emergence of Deepfake Videos: AI generated deepfake videos of child sexual abuse are now circulating. These typically involve adult pornographic content altered with a child's face, demonstrating significant advances in AI generation tools.
- Spread to the Clear Web: AI generated CSAM is now appearing not only on dark web forums but also on mainstream (clear web) and commercial websites, increasing the risk of exposure.
- Targeting Known Victims and Famous Children: Offenders are now using fine tuned AI models to create abuse material that features known child victims or famous children, further compounding the harm.

The school recognises the serious and emerging risks posed by AI generated CSAM and will remain vigilant, working closely with appropriate authorities and following all safeguarding procedures where such content is suspected or disclosed.

Honour-Based Abuse (HBA)

Honour-Based Abuse refers to incidents or crimes committed to protect or uphold the honour of a family or community. These acts often involve deeply rooted cultural or social pressures and may include practices such as Female Genital Mutilation (FGM), forced marriage, and breast flattening.

HBA is rarely isolated and often involves a wider network of family members or community influence, making it crucial for professionals to consider the broader context and potential risk factors when responding to concerns.

If any member of staff suspects that a child may be at risk of Honour-Based Abuse, they must immediately report the concern to the Designated Safeguarding Lead (DSL), who will take appropriate safeguarding action in line with statutory guidance.

Forced Marriage (FM)

Forced marriage occurs when one or both individuals are coerced into a marriage without their full and free consent. This coercion may involve violence, threats, or other forms of pressure.
In England and Wales, forcing someone into marriage is a criminal offence. Legal changes that came into effect in February 2023 (under the Marriage Act 1929 and Civil Partnership Act 2004) raised the minimum legal age for marriage or civil partnership to 18 years. This means that 16 and 17-year-olds can no longer marry or enter civil partnerships under any circumstances, including with parental or judicial consent.
The Minimum Age Act further expanded the offence of forced marriage. It is now a crime to take any action intended to cause a child under 18 to marry, regardless of whether:

- The child appears to consent
- They are deceived into leaving the country and coerced into marriage
- They lack the mental capacity to understand or consent

3. Female Genital Mutilation, Virginity Testing and Hymenoplasty, and Breast Flattening

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 DSL (or deputy DSL) with regards to any concerns about FGM. There is a specific legal duty on teachers in the UK under the FGM Act (2003) to report FGM. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18. It is mandatory that the school report this to the police using telephone number 101. They must be supported by a member of the safeguarding team should they do this.

3.1 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- The law defines 'virginity testing' as "the examination of female genitalia, with or without consent, for the purpose (or purported purpose) of determining virginity."

Hymenoplasty- The law defines 'hymenoplasty' as the reconstruction of the hymen (with or without consent).

Both virginity testing and hymenoplasty are considered forms of violence against women and girls and are linked to so-called 'honour-based' abuse. They are based on harmful cultural beliefs around female 'purity' and are used to

Impact on Victims

Emotional/Psychological /Physical Harm:

- The procedures are deeply degrading and can cause lasting trauma, including anxiety, depression, and PTSD
- Some victims experience suicidal thoughts or behaviours
- Virginity testing can result in tearing, bleeding, pain, and infection
- Hymenoplasty carries risks including acute bleeding, scarring, narrowing of the vaginal opening, and ongoing sexual pain

These practices are considered equivalent in severity to assault causing actual bodily harm, reflecting both the physical damage and the underlying controlling attitudes.

3.2 Breast Flattening (also known as Breast Ironing)

Breast flattening is a harmful and abusive practice involving the pressing, pounding, or massaging of a girl's developing breasts, often using heated objects or hard instruments, with the aim of delaying or reversing breast development.

This practice is most commonly carried out by female family members, particularly mothers, who may believe they are protecting the child from sexual attention, harassment, sexual violence, early pregnancy, or forced marriage. It may also be viewed as a way to allow the girl to remain in education and avoid societal pressures related to physical maturity.

However, regardless of the intent, breast flattening is a serious form of physical abuse. It can result in:

- Severe pain and discomfort
- Permanent tissue damage
- Infection and scarring
- Long-term emotional and psychological trauma

Breast flattening is a safeguarding issue and must be treated with the same level of urgency and seriousness as any other form of abuse. Any concerns or disclosures regarding breast flattening must be reported immediately to the Designated Safeguarding Lead (DSL) and addressed in accordance with the school's safeguarding procedures.

3.3 Faith or Belief-Related Child Abuse

As a school, we fully respect the rights of parents and guardians to hold personal faiths and beliefs. However, if these beliefs result in, or contribute to, actual or potential harm to a child, we have a legal and moral duty to act. In such cases, we will seek advice from safeguarding authorities and follow established child protection procedures.

Faith or belief-related abuse occurs when a child is harmed or placed at risk due to practices, attitudes, or actions rooted in spiritual or religious belief. This may include, but is not limited to:

- Belief in witchcraft or spirit possession
- Accusations that a child is cursed or possessed by evil spirits
- Ritualistic abuse, involving sustained physical, sexual, or psychological harm
- Satanic abuse, which may be linked to cult activity or ideological practices
- Any other harmful practices associated with religious or spiritual beliefs

In 2023, research identified over 2,000 cases of abuse in the UK linked to faith or belief. While this form of abuse represents a small proportion of those who hold such beliefs, the impact on affected children can be severe and long-lasting. This type of abuse is not confined to any one religion, culture, nationality, or ethnic group. Cases have been documented among communities identifying as Christian, Muslim, Hindu, and others. Most incidents occur within the family home, though they can happen in other environments. Due to the sensitive and hidden nature of these cases, under-reporting is a significant concern. All staff must be alert to signs that a child may be suffering from abuse linked to faith or belief. Any concerns should be reported immediately to the Designated Safeguarding Lead (DSL). These concerns will be addressed in accordance with local safeguarding procedures, and where necessary, with the involvement of Children's Social Care or the Police.

PARK SCHOOL

Signs and Indicators of Faith or Belief-Related Abuse

Staff should remain alert to the following possible signs that a child may be experiencing abuse linked to faith or belief. These indicators may present alone or in combination:

- Unexplained physical injuries, such as bruises, burns, or scarring—including signs of historical harm

- A child disclosing they have been accused of being 'evil' or stating they are having the ‘devil beaten out of them’
- Use of specific spiritual or cultural terms, such as *kindoki*, *djin*, *juju*, or *voodoo*, which may indicate exposure to belief-based harm
- The child appears confused, withdrawn, isolated, or disoriented, especially when noticeably detached from peers
- A noticeable decline in personal care, such as sudden weight loss, poor hygiene, persistent hunger, or consistently unclean clothing
- A lack of emotional bond or warmth between the child and their parent or guardian
- Irregular school attendance, or a sudden decline in engagement or academic performance
- The child is removed from school without a clear explanation or without arrangements for a new school place
- Possession of unusual items, such as distinctive jewellery, written charms, symbols, or ritualistic objects

These signs do not automatically confirm abuse but should raise concerns and prompt immediate reporting to the Designated Safeguarding Lead (DSL). Early intervention is vital in protecting the child from further harm.

Key Resources on Child Abuse Linked to Faith or Belief (CALFB)

- National Schools Safeguarding Guidance. Developed by the Metropolitan Police Service, this guidance includes a dedicated chapter on Child Abuse Linked to Faith or Belief (CALFB).
  Title: Guidance for Schools and Colleges: Safeguarding Children from Sexual Violence, CSE, and Harmful Practices
- Schools Charter on Ending Harmful Practices. This charter encourages schools to deliver high-quality, safeguarding-focused education around harmful practices, including those linked to faith or belief.
- UK Government: National Action Plan. A comprehensive plan outlining the government's commitment to tackling child abuse linked to faith or belief across the UK.
- Centre for FGM – Leaflet
  Resource: “Child Abuse Linked to Faith or Belief” (published 21-02-2024)
- Metropolitan Police: Online Guidance. Information and advice on recognising and responding to CALFB. Visit: Child Abuse Linked to Faith or Belief | Metropolitan Police

3.4 Behavioural Signs in Children

Staff must always recognise that all behaviour is a form of communication. When a child is being abused, neglected, or exploited, this may manifest through noticeable changes in their behaviour. These changes can vary significantly from child to child and may be subtle or sudden.

Examples of potential behavioural indicators include (but are not limited to):

- Acting aggressively, being disruptive, or frequently seeking attention; appearing to require more discipline than peers
- Showing signs of anger, social withdrawal, or a lack of motivation or creativity
- Displaying fear or anxiety around specific adults or children

- Appearing sad, withdrawn, or depressed
- Experiencing sleep disturbances, including trouble sleeping or excessive sleeping
- Becoming sexually active at a young age or demonstrating inappropriate sexual knowledge for their age
- Displaying sexualised behaviour in play or interactions with others
- Refusing to change clothes for PE or physical activity, or withdrawing from participation altogether
- Developing disordered eating habits
- Self-harming or expressing suicidal thoughts or feelings
- Changes in school attendance, such as frequent absences, truancy during the school day, or going missing from home or in the community
- Showing low self-esteem or confidence; alternatively, some children may exhibit sudden, uncharacteristic overconfidence
- Using drugs or alcohol as a coping mechanism, or showing sudden interest in substance use
- Possessing unexplained money, gifts, or items
- Spending increasing amounts of time online, especially in isolation
- Gaining a new group of friends, particularly older peers
- Being seen leaving school with unfamiliar individuals, either peers or adults

These signs are not definitive proof of abuse or exploitation, but they should raise concern and prompt further assessment. Any concerns must be reported immediately to the Designated Safeguarding Lead (DSL), in line with the school's safeguarding procedures. Early identification and response can be critical in protecting a child from further harm.

Behavioural Signs in Parents, Guardians, or Other Adults

Staff should also be alert to behaviours in parents, guardians, or other adults that may indicate a risk to the child's welfare. These signs, particularly when observed alongside concerns about a child's behaviour or wellbeing, may point to neglect, abuse, or a failure to meet the child's needs.

Possible indicators may include:

- Placing unrealistic expectations on the child, such as demanding academic or physical achievements beyond their capabilities
- Providing conflicting, vague, or implausible explanations for a child's injuries or behaviour
- Delaying or avoiding medical attention, particularly when the child presents with physical injuries, mental health concerns, or has disclosed suicidal thoughts
- Neglecting the child's basic needs, including food, clothing, hygiene, or safe and stable housing
- Struggling with substance misuse, unmanaged mental illness, or other personal difficulties and refusing offers of support
- Appearing emotionally distant, indifferent, or overtly rejecting toward the child
- Blaming the child for challenges at home or school, or denying that the child's behaviours or needs exist
- Describing the child in consistently negative or demeaning terms, such as referring to them as worthless or a burden
- Refusing support or intervention offered to help meet the child's needs

PARK SCHOOL

- Withholding consent or failing to engage with external agencies or support services designed to improve the child's wellbeing

While the presence of one or more of these behaviours does not automatically confirm abuse or neglect, they are important safeguarding indicators. If staff have any concerns, they must report them to the Designated Safeguarding Lead (DSL) without delay. Prompt action is essential to ensure the child receives the support and protection they may need.

3.5 Grooming

Grooming is the process by which an individual prepares a child, their environment, and the significant adults around them including staff and family members for the purpose of abuse and/or exploitation.

The motivation behind grooming may be sexual, financial (such as for exploitation or extortion), or a combination of both. Grooming can take place:

- Online or offline
- By strangers, known individuals, or peers
- By someone pretending to be someone the child knows
- By individuals of any gender identity, sexual orientation, or age—including other young people
- Anywhere in the world, especially in the case of online exploitation

How Grooming Works: Common Patterns of Behaviour

- Targeting a Vulnerable Victim
    - Offenders often select children who appear isolated, insecure, emotionally needy, or otherwise vulnerable. Grooming may take place over weeks, months, or even years, or occur rapidly.
- Gaining the Child's Trust
    - Perpetrators may allow or encourage the child to do things that are usually restricted, such as watching inappropriate content, staying up late, or eating forbidden foods, to build a sense of secrecy and emotional closeness.
- Gaining the Trust of Others
    - Offenders particularly in institutional settings often present as friendly, helpful, or charismatic. They may win the trust of parents, staff, and peers, making it harder to identify their intentions and easier to continue the abuse undetected.
- Meeting a Child's Needs
    - The groomer may provide the child with gifts, special attention, praise, advice, privileges, or trips, making the child feel special or favoured. This builds dependency and emotional attachment.
- Isolating the Child
    - Groomers may work to weaken the child's relationships with friends and family, making themselves the main or only trusted adult in the child's life especially in school or care settings.
- Sexualising the Relationship

PARK SCHOOL

    - This may begin subtly through inappropriate touching, tickling, or hugs, and escalate to sexual jokes, innuendo, or conversations that treat the child as a peer or adult (e.g. discussing personal or sexual topics).
- Maintaining Control and Secrecy
    - Offenders may use authority, manipulation, or emotional pressure to make the child believe they have no option but to comply. They may frame the abuse as a secret they must keep or make the child feel complicit.
- Threats and Intimidation
    - The child may be threatened with harm to themselves, their family, friends, or even pets if they disclose the abuse or attempt to resist it.
- Blackmail
    - Offenders may use intimate images or personal information to blackmail the child threatening to share such material with others unless the child continues to comply.
- Creating Opportunity
    - The offender will often engineer situations to gain unsupervised access to the child.
    - Staff must be vigilant to the signs of grooming and report any concerns immediately to the Designated Safeguarding Lead (DSL). Prompt action and professional curiosity are vital to interrupting the grooming process and protecting the child from further harm.

It is essential to recognise that while some individuals who groom children may display certain behaviours, not everyone exhibiting these signs is a sex offender. Context, patterns of behaviour, and professional judgement are critical in identifying safeguarding concerns. Staff should remain vigilant and report any behaviour that raises concern, especially when it appears inappropriate, secretive, or targeted.

<u>Signs and Indicators That a Child May Be Experiencing Grooming</u>
Many children and young people do not realise they are being groomed or may not recognise the behaviour they are experiencing as abuse or exploitation. It's important that all staff remain alert to changes in a child's behaviour, emotional state, or routine especially when these are unexplained or inconsistent.
Children and young people who are being groomed may:

- Be secretive about their activities, especially online
- Spend significantly more or less time online, including gaming, texting, or using social media
- Appear withdrawn, upset, anxious, or angry after being online or using their phone
- Avoid talking about who they are communicating with, or become defensive or evasive
- Have new phone numbers, contacts, or messages on their devices that they won't explain
- Possess more than one mobile phone or SIM card
- Be in, or believe they are in, a relationship with an older child or adult, either online or offline
- Visit unusual places to meet people and give vague or false explanations about where they're going or who they're with
- Have new possessions such as clothes, tech devices, or money that they can't or won't explain
- Show new or increased access to alcohol or drugs
- Go missing from home or school, or begin to regularly skip school without reason
- Display uncharacteristic behavioural changes, which may be sudden, extreme, or inconsistent
- Develop sexual health concerns, including STIs or unplanned pregnancy

- Express self-harming behaviours, suicidal thoughts, or show signs of disordered eating or compulsive exercise
- Show signs of depression, anxiety, or heightened emotional distress
- Demonstrate low self-esteem (though in early grooming stages, they may appear unusually confident or high-spirited)
- Begin stealing or selling items, including their own or others' possessions, possibly to repay debt or meet demands

In older children, the signs of grooming may be misinterpreted as typical teenage behaviour. However, changes in personality, secrecy, inappropriate sexualised behaviour, or relationships with older individuals should always raise concern.

3.6 Radicalisation

For full details, please refer to the school's Preventing Extremism and Radicalisation Policy.

All schools have a statutory responsibility under Section 26 of the Counter Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism", a responsibility commonly known as the Prevent duty.

There is no single indicator that a child may be vulnerable to radicalisation or extremist ideologies. A range of factors such as personal background, emotional distress, identity struggles, social influences, or exposure to radical content can increase susceptibility. Influences can come from family, peers, community, or online platforms.

The internet and social media are increasingly used as the primary tools to promote extremist views and to radicalise individuals, particularly young people. Radicalisation may take place gradually or quickly, and in any setting, including within the home.

As with all safeguarding concerns, staff should remain vigilant to changes in a child's behaviour, attitude, interests or peer associations, especially where these raise concerns about isolation, aggression, or ideological rigidity.

Staff must use professional judgement in identifying any child who may be at risk of radicalisation, and report concerns immediately to the Designated Safeguarding Lead (DSL) or the school's Prevent Lead. Where appropriate, a referral may be made to the Channel programme or other relevant authorities for early intervention and support.

<u>Signs and Indicators of Vulnerability to Radicalisation</u>

There are no definitive signs that confirm a young person is being radicalised; however, a combination of certain behaviours, circumstances, and vulnerabilities can increase the risk of grooming by extremist groups or ideologies. Key indicators may include (but are not limited to):

- Noticeable change in academic performance – either underachievement or sudden overachievement
- Possession or sharing of extremist materials, online or in print
- Social exclusion, isolation, or a strong desire for a sense of belonging
- Experience of poverty, disadvantage, or marginalisation

- Exposure to traumatic experiences, whether current or historical
- Reaction to global or national events, even without direct personal connection
- Religious conversion or significant changes in religious beliefs or practices
- Sudden or escalating changes in behaviour, such as increased aggression or withdrawal
- Signs of exploitation, including criminal, sexual, or emotional
- Exposure to or influence from known extremists or radical content
- Conflict with family over personal beliefs, lifestyle, or values
- Confused or fragmented sense of identity
- Being a victim or witness of racial, religious, or hate-based incidents
- Experiences of peer or family rejection
- Identified or emerging Special Educational Needs and Disabilities (SEND)

Adverse Childhood Experiences (ACEs)

Adverse Childhood Experiences (ACEs) are stressful or traumatic events that occur before the age of 18 and can have a long-lasting impact on a child's mental health, behaviour, development, and education potentially continuing into adulthood.

ACEs may include:

- Experiencing abuse, neglect, or exploitation
- Living in a household where there is domestic violence, substance misuse, mental illness, or criminal activity

These experiences can disrupt brain development and are linked to an increased risk of:

- Mental health issues
- Chronic health conditions
- Substance misuse
- Poor educational and life outcomes

Understanding and addressing ACEs early is essential to safeguard children's well-being and to reduce the risk of longer-term harm.

3.7 Mental Health

Mental health is defined by the World Health Organization as *"a state of wellbeing in which every individual realises their own potential, can cope with the normal stresses of life, can work productively and fruitfully, and is able to contribute to their community."*

Promoting positive mental health is essential for helping children become resilient, confident, and able to thrive. While all children will face challenges, some will experience significant adversity, including trauma or abuse. For many, adolescence brings added pressures, and transitions through school can be difficult. In these moments, the right support particularly from school can play a critical role in helping a child manage difficulties, recover from setbacks, and even prevent long-term mental health issues.

Today's children are growing up in an environment that presents new and evolving pressures. The need to support their mental health has never been more urgent.

Contributing Factors to Poor Mental Health in Children

A range of influences can contribute to children's mental health challenges, including:

- Lack of family support or unrealistic expectations from parents
- Conflict at home, including parental separation or ongoing arguments
- Peer relationship issues, such as bullying or social exclusion
- Negative body image or dissatisfaction with appearance
- Pressure related to drugs, alcohol, or risky behaviours
- Excessive screen time or unhealthy digital engagement
- Disordered eating behaviours, including extreme dieting or over-exercising

Some children are more likely to experience poor mental health due to specific risk factors or challenging life circumstances. These vulnerabilities can increase the likelihood of emerging mental health concerns and may make these children more identifiable through noticeable behaviours or changes. Research highlights eight broad groups of children who may be particularly at risk:

- Children receiving statutory support, including those in care or with a social worker
- Children who have experienced abuse, neglect, or exploitation
- Children with disabilities, chronic health conditions, or developmental challenges
- Children living in poverty or in households affected by domestic abuse
- Children who are vulnerable due to immigration status or nationality
- Children at increased risk due to their identity, such as those who identify as LGBTQ+ or are questioning their gender
- Children exposed to risks outside the home, such as gang involvement, exploitation, or radicalisation
- Young carers, particularly those responsible for caring for a parent or family member with illness or disability

Our school is committed to a whole-school approach to promoting and supporting the mental health and emotional wellbeing of all pupils. This means we:

- Foster a school culture and environment that supports positive mental health for every member of the community
- Actively raise awareness of mental health issues and work to reduce stigma and discrimination
- Ensure staff know each child holistically, including their emotional and mental health needs
- Provide training and development opportunities so staff feel confident in identifying and responding to mental health concerns
- Monitor and assess the mental health needs across the school community
- Offer both universal (school-wide) and targeted support to help pupils build emotional resilience
- Ensure that pupils and their families are aware of, and can access, a variety of mental health services and support
- Involve children and their parents/guardians in shaping decisions that affect their wellbeing
- Deliver high-quality, age-appropriate education around emotional literacy, mental health, and self-care strategies

Mental health and safeguarding are closely connected. All staff have a responsibility to recognise when a child is showing signs of emotional distress or emerging mental health concerns that may require referral to the Designated Safeguarding Lead (DSL).

PARK SCHOOL

While only qualified medical professionals can formally diagnose mental health conditions, school staff are well-placed to notice changes in pupils' behaviour, mood, or presentation during their daily interactions. These observations can be vital in identifying children who may be struggling.

Self-Harm: Understanding the Risks and Supporting Young People

it is essential to recognise that self-harm is often a manifestation of emotional distress or unmet mental health needs. As such, it falls under the umbrella of safeguarding concerns and must be responded to with urgency, sensitivity, and understanding.

Self-harm refers to any action taken by a child or young person to deliberately hurt themselves as a way of coping with difficult emotions, situations, or thoughts. According to *No Harm Done* (2017), it includes both non-suicidal acts and actions that may overlap with suicidal behaviour. While not all self-harming behaviour is intended as a suicide attempt, it can result in serious injury or accidental death and therefore must always be taken seriously.

Children and young people may self-harm for a variety of complex reasons, including:

- To manage overwhelming emotions or mental distress
- To relieve inner tension or anxiety
- To distract from emotional pain with physical sensation
- To express feelings of anger, frustration, or sadness
- As a coping mechanism or means of escape
- To exert control in a situation where they feel powerless
- To punish themselves or others
- To seek care or validation from others
- To identify with or gain acceptance in a peer group
- Common Methods of Self-Harm Include:
- Cutting, scratching, or picking at skin
- Swallowing harmful objects or substances
- Overdosing on medication
- Head-banging or hitting parts of the body
- Burning or scalding
- Hair pulling
- Self-strangulation, hanging, or suffocation

- Excessive use of alcohol or drugs
- Intentional misuse of medication
- Engaging in behaviours that cause harm or injury
- Warning Signs Staff and Parents May Notice:
- Changes in eating or sleeping habits
- Social withdrawal or isolation
- Mood swings or unusual emotional outbursts
- Decline in academic performance
- Joking or talking about self-harm or suicide
- Use of alcohol or drugs
- Expressions of hopelessness, low self-worth, or failure
- Wearing long sleeves consistently, even in warm weather

PARK SCHOOL

- Reluctance to engage in physical activities like swimming

Resources and Support

Several national organisations provide support for schools, parents, and children around self-harm, mental health, and emotional wellbeing:

- Department for Education
  - *Mental Health and Behaviour in Schools*
  - *Preventing and Tackling Bullying*
  - *Every Interaction Matters* (staff training webinar)
- Public Health England
  - *Promoting Children and Young People's Emotional Health and Wellbeing*
  - Lesson plans and resources: Rise Above
- NSPCC Learning
  - *Recognising and Responding to Mental Health Concerns*
  - NSPCC Self-Harm Guidance
- Papyrus – Suicide prevention charity for young people
  - Website: www.papyrus-uk.org
  - HOPELINE: 0800 068 4141
- Alumina – Free online support for young people aged 10–17
  - Alumina Support
- Samaritans – 24/7 listening service
  - Phone: 116 123
  - Email: jo@samaritans.org
- YoungMinds – Mental health support for young people and families
  - Phone: 0808 802 5544 (weekdays 9:30am–4:00pm)
  - Website: www.youngminds.org.uk

3.8 Children with Additional Needs or Disabilities

Children with SEND are at greater risk of abuse, including by peers. This group may face:

- Misinterpretation of abuse indicators as part of their disability.
- Greater impact from bullying without clear signs.
- Communication challenges making disclosure harder.

Staff must remain vigilant and not make assumptions.

Children Identifying as LGBTQ+

LGBTQ+ children may be more vulnerable if they lack trusted adults or face stigma. Children perceived to be LGBTQ+ may also face harm.

Gender-Questioning Children

The school recognises that gender-questioning children may experience additional vulnerability, bullying, isolation or mental health difficulties. Decisions affecting a child will be made on a case-by-

case basis, placing the child's welfare at the centre of decision-making. Parents will normally be involved unless doing so presents a risk of harm. The school will follow current statutory guidance and safeguarding expectations in force at the relevant time. Safeguarding considerations will take precedence in all decisions.

Children with a Family Member in Prison

These children are at increased risk of stigma, poverty, and isolation. They may need extra pastoral support. Staff can access advice through organisations like NICCO and PACT.

Children Involved in the Court System

- Criminal courts: Age-appropriate guides exist to help children giving evidence.
- Family courts: Legal disputes can cause stress and emotional harm. Staff should not mediate court matters. The Ministry of Justice offers an online tool to support families.

Children Absent from Education

Being absent from education, as well as missing education, can be an indicator of abuse, neglect, exploitation, child criminal exploitation, child sexual exploitation, mental health concerns, radicalisation or other safeguarding concerns. Attendance data will be monitored proactively to identify patterns of concern and trigger safeguarding review where appropriate.

Elective Home Education (EHE)

While many home-educated children thrive, some may become less visible to safeguarding professionals.
If parents intend to home educate, the school will hold a meeting to discuss the decision and any safeguarding concerns, especially for vulnerable children. Referrals may be made if needed.

Alternative Provision

If a child is in receipt of alternative provision, we will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working in the establishment. This includes written confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk, so that the school can ensure itself that appropriate safeguarding checks have been carried out on new staff. We will obtain daily attendance records and there will be frequent reviews. The school will terminate the arrangement if any safeguarding concerns arise.

Whilst a pupil attends alternative provision, the school retains overall responsibility for safeguarding and promoting the welfare of the pupil. Robust communication, monitoring, attendance tracking, safeguarding oversight and quality assurance arrangements must be maintained throughout the placement.

Children with a Social Worker

PARK SCHOOL

These children are often experiencing complex family issues and face barriers to learning and wellbeing. Staff must prioritise early intervention and work with external agencies to support their safety and progress.

Children Who Cannot Live with Their Parents

- Private Fostering
- When a child lives with someone who isn't a close relative for 28+ days, Children's Services must be notified. Staff should inform the DSL if they believe this applies.
- Looked After and Previously Looked After Children
- These children may live in foster care, residential settings, or with kinship carers. They are at higher risk of poor outcomes. The school's Designated Teacher for LAC works with the DSL and Virtual School Head to support their educational and emotional needs.
- Host Families / Sponsored Visa Students

Where a child stays with a host family for 28+ days, this may constitute private fostering and must be reported to Children's Services.

- Adoption and Guardianship

Adopted and guardian placed children may remain vulnerable and need extra support. Guardianship differs from adoption and is usually temporary, with court oversight.

<u>Children Staying with Host Families (Homestays)</u>

Schools sometimes arrange exchange visits where pupils stay with host families in the UK or abroad. These can enhance learning but require clear safeguarding measures.

UK Homestays Arranged by School

- Schools must assess the suitability of host families and are considered the regulated activity provider.
- Adults hosting pupils must undergo a DBS enhanced check with barred list information.
- This check is free if the host is a volunteer.
- Schools may also choose to check others in the household (16+).
- If a homestay exceeds 28 days, it may be considered Private Fostering and must be reported to the Local Authority.
- Privately Arranged Homestays
- If parents arrange the stay themselves, it's a private arrangement and not the school's responsibility.
- No DBS checks can be conducted in these cases.
- Overseas Homestays
- DBS checks are not possible.
- Schools should liaise with partner schools to assess safeguarding arrangements.
- Risk assessments must be completed, especially for vulnerable pupils.
- Parents must be informed and give written consent.
- Pupil Safety During the Visit
- Pupils must know who to contact if they feel unsafe or have concerns during their stay.

PARK SCHOOL

4.1 Stages of Safeguarding

Early Help

Early help is support provided to children and families at the earliest stage of need to improve outcomes, build resilience, and reduce the risk of issues escalating into harm. Early intervention is more effective than reacting once problems have worsened. If early help is appropriate, the DSL or DDSL will usually lead on coordinating support and may initiate a multi-agency assessment. Staff may be asked to contribute to, or lead, the process where needed. Local arrangements vary, so please speak to the DSL for information about the school's early help pathway. Early help support can include:

- Signposting parents/guardians to local services
- Offering in-school interventions (e.g. pastoral care, mentoring, ELSA, emotional literacy sessions, behaviour support, SENCO support, wellbeing drop-ins, or small group social skills programmes) across all year groups

All early help cases will be regularly reviewed. If concerns persist, or parents/guardians do not engage, a referral to Children's Social Care may be made for statutory intervention.

Children allocated a Social Worker

Some children are allocated a Social Worker due to safeguarding or welfare concerns such as abuse, neglect, exploitation, or complex family issues. These experiences can make children more vulnerable to harm and may impact their attendance, learning, behaviour, and mental health.

Local authorities should inform schools when a child has a Social Worker and clarify whether they are on a Child in Need (s17) or Child Protection (s47) plan. In most cases, the school will already have been involved in the assessment process. The DSL (or DDSL) must attend all plan review meetings. Knowledge of a child's social care involvement should inform safeguarding decisions and shape the support offered. Any new concerns must be shared promptly with the allocated Social Worker (or their manager if unavailable).

Children in Need

Under the Children Act 1989, a Child in Need is one who:

- is unlikely to achieve or maintain a reasonable standard of health or development without support,
- has health or development that is likely to be significantly impaired without services, or is disabled.

Local authorities must provide services to safeguard and promote the welfare of such children, assessed under Section 17 of the Act. These children will have a Child in Need Plan, which should be shared with the school by the allocated Social Worker. The school is expected to attend and contribute to all Child in Need review meetings.

Children suffering or likely to suffer significant harm

If a local authority has reasonable cause to suspect a child is suffering or likely to suffer significant harm, it must make enquiries under Section 47 of the Children Act 1989. These investigations involve relevant agencies, including schools, and aim to determine whether action is needed to protect the child.

This applies to concerns such as abuse, neglect, FGM, honour-based abuse, and exploitation (e.g. radicalisation, sexual or criminal). If a Child Protection Plan is put in place following assessment and an Initial Child Protection Conference, the allocated Social Worker must share it with the school.

The school must attend and engage in Core Group meetings and follow guidance in Working Together to Safeguard Children (2023).

4.2 Contextual Safeguarding

Contextual Safeguarding recognises that young people may experience harm such as abuse, neglect, or exploitation outside the home, including in peer groups, schools, neighbourhoods, and online.

These extra-familial influences can reduce parental control and strain parent child relationships. Staff must also consider the wider impact of intra-familial harm, including the need for support for siblings following incidents like child-on-child abuse.

This approach requires safeguarding professionals to assess and engage with the environments where harm occurs and work with those who influence these spaces. It broadens traditional child protection to include all areas where children may be at risk.

4.3 What to Do If You Have Concerns About a Child

All staff must know how to respond to concerns about a child's welfare. Children may struggle to disclose abuse, neglect, or exploitation, and may not recognise their experiences as harmful. Staff should aim to build trusted relationships and understand that the first disclosure may not be the only incident.

If a child discloses harm or if staff have any concerns, they must inform the DSL or DDSL on the same day verbally or via the electronic system, Serious disclosures must be reported immediately and verbally to the DSL/DDSL.
Parents/guardians should be informed of concerns the same day, unless doing so would increase risk to the child. In high risk or disclosure situations, advice from authorities must be sought before informing parents. If parents are separated, both must be informed unless this could raise safeguarding concerns.

Responding to a Child's Safeguarding Disclosure

If a child discloses abuse, neglect, exploitation, self-harm, or suicidal thoughts, staff must:

- Stay calm, listen carefully, and allow the child to speak without interruption.
- Avoid judgmental or leading questions; use simple prompts like *what, when, how, where*. Do not ask *why*.
- Reassure the child using supportive language
- Clarify key points only; do not investigate. Let the child share at their own pace.
- Summarise what's been said using their own words and check for understanding.

- Explain next steps clearly, using age-appropriate
- Take the child directly to the DSL/DDSL. If unavailable, ensure they are supervised until stable.
- If physical harm is disclosed, seek immediate medical attention. Do not take photographs of injuries.
- If suicidal ideation is disclosed, the child must be supervised at all times until appropriate support is arranged.
- If DSL/DDSL are unavailable within an hour, contact the Group Lead Safeguarding
- Avoid discussing the disclosure with others, except those directly responsible for safeguarding.

Actions following a concern/disclosure

Following notification of concern/disclosure, the DSL 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/guardians 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

<u>Making Referrals</u>

If a child is at risk of harm referrals to Children's Social Care must be made immediately. If a child or parent is in imminent danger or a crime has occurred, the Police should be contacted first, followed by Social Care.

While any staff member can make a referral, the DSL or DDSL will usually do so. There must be no delay. The DSL/DDSL may speak further with the child to clarify the concern before referring if this will assist external agencies.

Parental consent is not needed if doing so places the child at further risk or may interfere with an investigation. The DSL/DDSL will ask Social Care if/when the concern can be shared with parents.

All referrals must be reported to the Head and the Group Safeguarding Lead.

If a child has unmet needs but is not at risk:

Referrals may still be made to Children's Social Care for early help or support. While consent is not legally required, it is best practice to inform parents—unless this would put the child at risk. Some local authorities will only accept referrals of this nature with parental consent.

Inter-Agency Working

The DSL and Deputy DSLs work in partnership with relevant agencies to safeguard children, in line with Working Together to Safeguard Children (2023). They are familiar with the local Safeguarding Partners' threshold guidance, which outlines referral processes and levels of need for early help and statutory services.

When necessary, DSLs liaise directly with Police, Health, and Local Authority Children's Services. The DSL follows the NPCC guidance on when to call the police and understands the statutory requirements under PACE (Police and Criminal Evidence Act 1984).

Appropriate Adult

When police wish to interview a child or vulnerable person suspected of an offence, the DSL ensures an 'Appropriate Adult' is present, as required by law. This may be a parent, social worker, or another responsible adult not connected to the police.

If vulnerabilities are known, the DSL must inform the attending officer and intervene if procedures under PACE are not followed. All communication must be logged. A child cannot be cautioned or questioned without an appropriate adult present.

Family Help

Staff should identify children who may benefit from Family Help, Early Help or targeted intervention at the earliest opportunity. Concerns should not be allowed to escalate before support is offered. Early intervention and effective information sharing remain fundamental safeguarding principles

Confidentiality

Staff must never promise confidentiality to a child. While it's important to listen and respect their wishes, any safeguarding concern must be shared with the Safeguarding Team to keep the child safe.

Photographs of Injuries

Staff must never take photos of a child's injuries, including those from self-harm or abuse.

Exception: Only if directly instructed by Police or Social Care, a Safeguarding Team member may take a photo using a school device, with a witness present.

- No intimate areas (genitals or chest) should ever be photographed.
- Images must be sent securely, deleted after confirmation of receipt, and fully logged, including who made the request and their contact details.

Record-Keeping

All safeguarding records digital or physical must be stored securely with restricted access.

PARK SCHOOL

Records should include:

- A clear summary of the concern or disclosure, including relevant context.
- Immediate actions taken, decisions made, and any interventions (e.g. referrals).
- Confirmation that parents/guardians were informed (unless doing so posed a risk).
- The outcome, including whether the concern was resolved or needs addressed.

For disclosures involving harm:

- Staff must speak to the DSL immediately (or DDSL, Headteacher, or Group Lead Safeguarding)
- A written account of the child's words must be recorded as soon as possible, using quotation marks for the child's exact language.

The Safeguarding Team must document:

- All actions taken and decisions made (including rationale for each).
- Ongoing case activity, interventions, and updates.

4.4 Transferring Safeguarding Records

When a child leaves the school, the DSL must securely and confidentially transfer their safeguarding records to the new school within:

- 5 days for an in-year transfer
- 5 days from the start of term for standard transitions

(KCSIE 2026)

Before doing so, the DSL should confirm enrolment with the receiving DSL or Headteacher and then arrange secure transfer. No information should be shared until the child is officially on roll.

Safeguarding files must be sent separately from the pupil's academic records. Receipt must be confirmed and recorded.

In some cases, it may be appropriate to share key safeguarding details ahead of transfer to help the receiving school prepare support. This should be done with parental knowledge unless doing so would increase risk. if so, consult Social Care before sharing.

Sharing information is vital to keeping children safe. Data protection must not prevent information sharing where a child is at risk of harm.

4.5 Reporting and Recording Concerns About an Adult in School

Expectations of Staff Conduct

All adults in school—including employees, volunteers, supply/agency staff, contractors, and visitors are expected to always maintain the highest professional standards. Any behaviour that could place children at risk or be misinterpreted must be avoided.

Staff must report any concerns about an adult's behaviour, no matter how minor, to the DSL, Deputy DSL, or Headteacher on the same day. Adults must never misuse their position of trust; all interactions with students must be appropriate and in line with the Staff Code of Conduct.

Low-Level Concerns (see low level concern policy)

A low-level concern is any behaviour by an adult working in school that:

- Falls short of the staff Code of Conduct, and
- Does not meet the threshold of an Allegation

Examples include:

- Being overly familiar with a student
- Working 1:1 with a child in an isolated space
- Using inappropriate or intimidating language

Even minor or unintentional behaviours must be reported, as they may form part of a concerning pattern.

Reporting Process

Low-level concerns (including self-reports) must be reported in writing to the Headteacher as soon as possible, on the same day.

The Head will review each concern and decide:

- If it remains a low-level concern
- If it forms part of a wider pattern
- Or if it meets the allegations threshold

If in doubt, the Headteacher will consult the Group Safeguarding Lead or the Local Authority Designated Officer (LADO).

What Happens Next?

- The concern will be discussed confidentially with the person who raised it.
- The adult in question will be informed once risk has been assessed.
- Action may include informal guidance, mentoring, or training.
- Decisions will be recorded in the school's Low-Level Concerns Log, which is kept confidential by the Head.

Record Keeping

Low-level concerns are not recorded in a staff member's personnel file unless they escalate or lead to formal action. Records are retained securely for up to 10 years for safeguarding purposes.

Self-Reports

Staff are encouraged to report their own potential breaches of the Code of Conduct (e.g., accidental over-familiarity, poor word choice). This promotes transparency and allows early support.

Allegations

A concern becomes an allegation if an adult is suspected of:

- Harming or risking harm to a child

PARK SCHOOL

- Committing a criminal offence against a child
- Behaving in a way that raises concerns about suitability to work with children

(An allegation may be triggered by one specific incident or 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).

In such cases:

- The DSL or Headteacher must inform the LADO immediately
- The adult must be removed from unsupervised duties if needed
- The school will follow statutory procedures

References

Low-level concerns will not be included in employment references unless:

- They relate to formal disciplinary outcomes
- They were part of a substantiated allegation

Outcome of an allegation

The following definitions will be used when determining the outcome of allegation 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

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.

Substantiated allegations must be included in references in accordance with statutory guidance.

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

Registered Provision

Registered providers must inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere). Registered providers must also notify Ofsted of the action taken in respect of the allegations. These notifications must be made as soon as is reasonably practicable, but at the latest within 14 days of the allegations being made. A registered provider who, without reasonable excuse, fails to comply with this requirement, commits an offence.

Record Keeping (Allegations Against Staff)

Allegations found to be malicious will be removed from a staff member's personnel file. For all other allegations, a clear and comprehensive summary must be retained, including:

- The nature of the allegation
- How it was investigated and resolved
- Actions taken and decisions made

This record:

- Ensures accurate responses for future references, where appropriate
- Provides context for any non-conviction information disclosed in future DBS checks
- Helps avoid unnecessary re-investigation of past matters

Retention:

Records will be kept until normal pension age or for 10 years from the date of the allegation—whichever is longer. This is especially important in the event of any future Police investigations, including non-recent abuse allegations.

References

- Allegations that were false, unsubstantiated, or malicious will not be included in references.
- A history of repeated unfounded allegations will also not be referenced.
- See Keeping Children Safe in Education (KCSIE) for full guidance on reference content.

Organisations Using School Premises

Where safeguarding concerns relate to individuals working for organisations using school premises, the school will follow the same safeguarding principles applied to allegations against its own staff. Concerns will be referred promptly to relevant safeguarding agencies and, where appropriate, to the organisation responsible for the individual concerned. Safeguarding arrangements for third-party users will be reviewed regularly.

4.6 Whistleblowing

Please refer to the staff Whistleblowing Policy for more information.

All adults 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 situation is not resolved, or the staff member is uncertain about whether something is within the scope of the Whistleblowing Policy, they should seek advice from the Whistleblowing. Officer Staff are strongly encouraged to reach out at an early stage.

Where an adult feels unable to raise a concern about poor safeguarding practice within Forfar through the above options or where they feel that their concern is not being addressed, they can raise their

concern externally. The NSPCC whistleblowing helpline is available for adults who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – lines are available from 8:00am to 8:00pm, Monday to Friday, or email: help@nspcc.org.uk

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.

4. Managing Situations

5.1 Managing situations involving child-on-child abuse

If a staff member suspects that a child is at risk of abuse or exploitation by another child (or group), or that a child may be harming others, they must report their concern verbally to the DSL immediately, followed by a written record. Parents/guardians should be informed unless doing so would increase the risk to the child or others. The DSL will assess the situation, ensure immediate safety for all involved, and consult with the reporting staff member. If the behaviour is suspected to be abusive or exploitative, the DSL will contact Children's Social Care and/or the Police without delay. Once referred, Children's Social Care (and other relevant agencies) will guide the school on next steps, investigate the incident and context, and assess the risk posed by the alleged perpetrator to others.

Immediate Actions Following a Child-on-Child Abuse Disclosure

Separate the Children. While the school gathers facts and liaises with Children's Social Care and the Police, the alleged perpetrator should be removed from shared classes with the victim. Suspension may be considered if separation is not possible or the risk is too high.

Maintain Safe Distance. Ensure the victim and alleged perpetrator remain apart throughout the school day, including before/after-school activities and transport, as a protective, non judgmental measure.

Assess Wider Safeguarding Risks. Consider whether the incident reflects broader safeguarding concerns affecting any of the children involved.

Recognise All as Vulnerable. Treat both the victim and perpetrator as potentially at risk. The perpetrator may also have significant unmet needs requiring support.

Understand Complexity of Consent. Acknowledge the nuanced nature of child-on-child abuse, choices made under pressure or imbalance of power may not represent true consent.

Respond Appropriately to the Perpetrator. Actions should address the behaviour, its root causes, and any support needed. Consider the risk posed to others, severity of the abuse, and the perpetrator's own vulnerabilities.

Following any initial safety actions, a written Safeguarding Risk Assessment must be completed. This should be developed in collaboration with the children involved, their parents/guardians, and the safeguarding team, and reviewed regularly.

The assessment must consider each child involved, whether victim or alleged perpetrator and include:

- The victim's needs, protection, and support
- Any potential other victims or perpetrators
- The alleged perpetrator's needs, supervision, and support
- The wider school community, including peers and staff who may be at risk
- The time and location of the incident and steps to improve safety in that setting

The school should reflect on the incident to identify lessons learned and take steps to reduce the risk of recurrence. This may include work on gender and equality, improving site safety and supervision, raising awareness among staff, students, and parents, or providing targeted staff training on managing specific types of abuse.

Managing child situations involving the sharing of nudes/semi-nude imagery/videos.

Where the report includes an online element, staff should be aware of searching, screening and confiscation advice (for schools) (and the Use of Reasonable Force Policy) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.

Staff must never view, copy, or forward illegal images. If they receive one, they must report it immediately to the DSL. Devices may be confiscated to preserve evidence, but only the Police should review or remove any illegal content. The incident must be reported to the DSL without delay. The DSL will follow national guidance and assess the situation, possibly involving external advice (Group Safeguarding Lead, Police, or Children's Social Care). Parents/guardians should be informed early and included in the process, unless doing so would place the child at further risk or interfere with an investigation. If significant harm or risk of harm is suspected at any point, an immediate referral must be made to Children's Social Care and/or the Police.

Managing situations involving sexual violence and/or sexual harassment.

All staff must be trained to handle disclosures of sexual violence or harassment and should seek immediate support from the DSL after any disclosure. Responses must align with the school's broader approach to child-on-child abuse, regardless of whether the incident occurred on or off-site, or online. Staff may take brief notes during the disclosure (especially if another adult is present) but should stay engaged with the child. A factual written record must be completed as soon as possible after immediate actions are taken. These notes may be used in statutory assessments or criminal investigations. Schools should usually inform parents/guardians unless doing so would increase risk to the child. If they do not inform them, the school must ensure the child is well-supported, involving Social Care or specialist agencies as needed. All actions and external advice must be clearly recorded. Schools must take all reasonable steps to protect the anonymity of any children involved in reports of sexual violence or harassment. Only relevant staff should be informed, and support arrangements must be carefully managed.

Responding to Concerns About a Child's Mental Health

If a staff member has concerns about a child's mental health, they must respond immediately, prioritising any urgent medical risk and inform the DSL if safeguarding concerns are also present. The DSL will assess the situation, factoring in any safeguarding risks that may be contributing to or resulting from the mental health concern. Parental involvement is essential unless it increases the risk to the child, in which case advice will be sought from statutory agencies.

Intervention and Support Stages

Support is most effective when children and parents are involved in planning. Interventions are reviewed regularly.

- Universal Support: Emotional wellbeing support for all students, in partnership with parents.
- Pastoral Support: Additional informal check-ins with trusted staff.
- Targeted Support: Structured support for emerging needs, led by nominated staff.
- External Support: Referral or signposting to external professionals or agencies when school-based support is insufficient.
- Language Matters. Staff must use sensitive, non-stigmatising language when speaking with pupils about mental health. (See: NSPCC - Rethinking the Language of Suicide.)
- When a Child Is Self-Harming
- Administer first aid and inform parents, unless doing so increases risk then consult Social Care or the Group Lead Safeguarding.

For serious harm, call 999 and notify parents (unless risk assessment advises otherwise).

When a Child's Mental Health Prevents School Attendance

In rare cases, a child's mental health needs may be so severe that, despite support, the school cannot safely meet their needs on site. Any decision for a child to remain at home is made in close collaboration with parents and is typically temporary, pending a written medical assessment from the child's clinician confirming they are well enough to return either full-time or on a phased basis. The final decision also considers the school's specific context and capacity.

In very limited cases, if all interventions have been exhausted and the school cannot ensure the child's safety or wellbeing, a decision may be made that the school is no longer the appropriate setting. This would follow careful consideration of all other possible options.

5.2 Visiting professionals and speakers

Professionals:

Visitors attending in a professional capacity must show photo ID and any professional lanyards/badges on arrival. The school must confirm appropriate safeguarding checks have been carried out either directly or through written assurance from the visitor's employer.

Visiting Speakers:

External speakers (including parents) can add educational value, but their suitability must be assessed. This includes checking the educational purpose, age-appropriateness, content, delivery style, and ideology. Online due diligence and a pre-visit discussion must be carried out. A risk assessment must be completed and relevant social media checks instigated.

5.3 Use of School Premises by External Organisations

Schools must ensure appropriate safeguarding measures are in place when allowing external organisations to use their facilities.

School led or supervised activities: The school's safeguarding policy and procedures apply.

Hirers: If the school rents space to an outside body, it must confirm the provider has suitable safeguarding and child protection policies, procedures, and arrangements for liaison with the school. This applies whether or not the children involved are on the school roll. Schools should refer to Keeping Children Safe in Out-of-School Settings guidance to assess compliance. If the provider lacks safeguarding procedures, they must not be permitted to use the premises. Safeguarding requirements must be included in lease/hire agreements, with non-compliance grounds for termination. If a safeguarding allegation arises from an external hire, the school must follow its safeguarding policy and procedures.

PARK SCHOOL