

Old Windebrowe School

Safeguarding and Child Protection Policy

2026-2027

NEWREFLEXIONS
Where every child matters

Key Personnel

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Head Teacher and Designated safeguarding lead (DSL)	Trevor Marsden	017687 20751 / 07855 125875
DSL for New Reflexions	Craig Wilson	01939 210040
Mental Health Lead	Trevor Marsden	017687 20751
CEOP Ambassador and RSHE Lead	Trevor Marsden	017687 20751
Local authority designated officer (LADO)	Cumberland LADO	0300 303 3892 / lado@cumberland.gov.uk
Cumberland Children Advice and Support Service (CCASS)		0333 240 1727 (professionals complete the Cumberland Single Contact Form)
Emergency Social work team (out of hours)		Emergency Duty Team: 0300 373 2724
Chair of Proprietors	Mandy Clarke	07748 923234
Channel helpline	N/A	020 7340 7264
Cumberland Safeguarding Children Partnership procedures	cumberlandscp.trixonline.co.uk	

Contents (Ctrl and Click on link to access or Ctrl F to see all headings and sub heading)

Policy Scope and Aims
Safeguarding Statement
Key Terms
Legislation, Standards and Guidance
Linked Policies
Roles and Responsibilities
Professional development and support
Ensuring Safe Practice
Record Keeping and Information Security
Working in Partnership
Teaching our children how to keep safe.
Online Safety
Preventing Radicalisation
Children potentially at greater risk of harm
Child-on-Child Abuse (including harassment and violence)
Staff Safeguarding Concerns: Recognise, Respond, Report
Designated Safeguarding Lead Response
Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures
Appendix B: Safeguarding Concern Reporting Form
Appendix C: Harmful Sexual Behaviour Risk Assessment
Appendix D: Harmful sexual Behaviour assessment tool
Appendix E: Alternative Provision Quality Assurance Checklist

Policy Scope and Aims

This policy applies to anyone working on behalf of *Reflexions Education* including senior managers and the proprietors, staff, volunteers, contractors, supply staff and students.

The policy is publicly available on the school website (or on request from the Head Teacher) so that it can be accessible for our learners; their families and anyone visiting and /or working with us.

The policy aims to meet the requirements as outlined in Keeping Children Safe in Education 2026.

Safeguarding Statement

We believe that:

- All children have the right to protection from all types of abuse and exploitation.
- Everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them.

This means that we will:

- Not tolerate the abuse neglect or exploitation of children. This includes never accepting, dismissing or tolerating and always challenging or raising concerns about words or actions which downplay, justify, or promote discrimination abuse, neglect, exploitation and/or harm; including child-on-child abuse (including harassment and violence). This applies to anyone who is part of, comes into or works with our schools.
- Be child centred and ensure that we consider the best interests of children in everything that we do. This includes ensuring that we enable children's voices and experiences to be heard (using communication tools and advocacy if necessary); and that children are involved in and informed about the decisions being made about them.
- Ensure we provide a safe environment for children to learn, grow and develop and feel able to raise any concerns they may have for themselves or others.
- Look out for and respond promptly and appropriately to all identified concerns, incidents or allegations of abuse neglect or exploitation of a child.
- Ensure no child or group of children are treated less favourably by us than others. This means being inclusive, anti-discriminatory and responsive to the needs and experiences of children and families, particularly those who are in group or communities who are more likely to experience discrimination.
- Recognise that bias can be a barrier to safeguarding practice including professional curiosity; which can adversely impact children in some groups or communities.
- Be aware of and take extra positive actions that may be needed to safeguard and promote the welfare of a child(ren) who we know are more vulnerable to experiencing abuse, exploitation or discrimination.
- Work in partnership with our learners, their parents, carers, and other agencies.

Key Terms

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether this is within or outside of the home, including online.
- preventing impairment of children's mental and physical health or development,
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

- taking action to enable all children to have the best outcomes.

Child Protection is a part of safeguarding and promoting welfare. It refers to the specific activity that is undertaken to protect specific children who are suspected to be suffering, or are likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including physical abuse, sexual abuse, emotional and psychological abuse, coercive and controlling behaviour and economic or financial abuse, where they see, hear, or experience its effects.

Children may be abused in a family or in an institutional or extra-familial context by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children. This includes in teenage relationships, or under the guise of 'honour' based abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession.

There are a number of types of abuse and safeguarding issues that could increase the risk that a child could be abused. These are further defined and explained in, Part 1, Part 5 and Annex A of Keeping children safe in education

Staff refers to all those working for or on behalf of our schools, full or part time, temporary or permanent in either a paid or voluntary capacity. The exception to this term is Proprietors.

Proprietors refers to those who are part of the Reflexions Education Proprietal Body.

Child includes everyone under the age of 18.

A **Parent** refers to birth parents and others who have parental responsibility (as defined by the Children's Act 1989) or has care of a child.

Data protection laws refer collectively to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.

Legislation, Standards and Guidance

This policy is based on the following legislation, guidance, standards, and procedures:

Legislation	Statutory National Guidance/Standards	Local Procedures
• *Education Act 2002 Section 157 (Independent schools incl Academies and CTC's)* • *The Education (Independent School Standards) (England) Regulations 2014* • Children Act 2004, section 16LA (Duty to share information), inserted by	• Keeping Children Safe in Education and any legislation or guidance (statutory/non-statutory) outlined or referenced within it. • Information Sharing Duty: statutory guidance for safeguarding organisations and their practitioners (DfE, September 2026). •	• Cumberland Safeguarding Children Partnership (CSCP) procedures, including the Cumberland Multi-Agency Thresholds Guidance • CSCP Referrals procedure (chapter 1.0.2) and Escalation Policy (chapter 5.0.2) • CSCP Allegations Against Staff or Volunteers (chapter 1.0.10)

section 4 of the Children's Wellbeing and Schools Act 2026. In force from 30 September 2026 • Children's Wellbeing and Schools Act 2026	• Working Together to Safeguard Children	

Linked Policies

• Positive Behaviour/Preventing-Bullying Policy (including use of mobile phones) • Staff Code of Conduct • Health & Safety • Curriculum intent, implantation and impact policies • Relationships and Sex Education • Complaints • SEND • Visiting Speaker policy • Filtering and Monitoring and AI Policy	• First aid Policy • Acceptable use agreements • Risk Assessments • Appraisal, performance management and capability policy • Data Protection and GDPR • Attendance policy • CCTV Policy • Disability, equality and accessibility policy • New Reflexions whistle blowing policy • Preventing Radicalisation

Roles and Responsibilities

We follow the statutory guidance as set out in the latest Keeping Children Safe in Education (and associated documents and guidance); adhering to the roles and responsibilities and expectations identified for:

The Proprietors

Have a strategic leadership responsibility for ensuring we take a whole school approach to safeguarding arrangements as outlined in this policy and that we comply with our duties under Legislation and Guidance. Part 2 Keeping Children Safe in Education outlines their key responsibilities.

The Safeguarding Proprietor is responsible for leading on the governance oversight of safeguarding arrangements; termly meetings with the Designated Safeguarding Lead and reporting back as part of the proprietal board meetings.

The Proprietors safeguarding lead will liaise with the Local Authority in the event of an allegation of abuse made against the Headteacher in line with Ensuring safe staff .

All Proprietors will ensure:

- Each school has a Designated Safeguarding Lead who has the appropriate status, authority, skills and experience to carry out duties of the post and is provided with the time, funding, resources, and support needed to carry out their role effectively.
- Continuity of safeguarding responsibilities if the Designated Safeguarding Lead is unavailable due to illness, leave, or other circumstances.

- The school has safeguarding policies and procedures in place (as outlined in Part 2 Keeping children safe in education that are implemented effectively and comply with our duties under Legislation, Standards and Guidance at all times.

- All staff and proprietors are knowledgeable and confident in carrying out their safeguarding duties in line with Professional development and support.
- That the effectiveness and implementation of safeguarding arrangements are robustly overseen by the Proprietor through board reports and challenge within meetings.

The Headteachers:

Are responsible (with the lead support of the Designated Safeguarding Leads in each school) for ensuring safeguarding arrangements are implemented effectively.

This includes**:**

- Having the overarching responsibility of ensuring the effectiveness of school safeguarding arrangements as outlined in this policy.
- Being accountable and reporting to the Proprietal Body on the effectiveness of school safeguarding arrangements.
- Supporting and promoting a whole school safeguarding culture and ethos as outlined in our Safeguarding Statement. This includes ensuring that Senior Leadership Teams work effectively together and with the Designated Safeguarding Leads, to ensure a Reflexions Education whole approach to safeguarding.
- Take the lead role in Ensuring Safe Practice; including ensuring staff are knowledgeable and confident in their safeguarding practice; including making sure that their practice is in line with national and local requirements. The Headteacher is also the lead person responsible for receiving, managing, and referring to/liaising with the Local Authority Designated Officer (with the support of the Designated Safeguarding Lead if different) or any other authorities regarding allegations of abuse made against staff or other organisations/individual who use school premises.
- Enabling the Designated Safeguarding Lead and any deputy(ies) to carry out their roles effectively, ensuring that they have the appropriate status, authority, skills and experience to carry out duties of the post and are given sufficient time, training, support, resources. They should also ensure continuity of safeguarding responsibilities if the Designated Safeguarding Lead is unavailable due to illness, leave, or other circumstances.
- Ensuring that all school policies including safeguarding policies and procedures and those required to be in place, are implemented and followed by all staff. These must have consideration to sport (KCSiE Part 2), safeguarding requirements relating to premises(KCSiE Part 2), educational visits, safeguarding children with medical conditions and the Prevent duty.

The Designated Safeguarding Lead (DSL):

Takes the lead responsibility for safeguarding and child protection in our schools. Annex B Keeping Children Safe in Education 2026 outlines their key responsibilities. Our Deputy Designated Safeguarding Lead(s) (hereafter referred to as DDSL) support the Designated Safeguarding Lead in the discharge of their responsibilities.

Responsibilities include:

- Ensuring that each school has a child protection policy in place as required by Keeping Children Safe in Education, that is implemented and followed by all staff.
- Being available to deal with safeguarding and child protection during school hours, using our secure Arbor system to record as appropriate. When the DSL is unavailable, the Deputy DSL (Chris Smith) provides cover, and staff upload concerns on Arbor which is monitored by the DSL and deputy. Out

of school hours, the New Reflexions group DSL (Craig Wilson) provides cover and can be contacted 24 hours a day.
- Acting as the point of contact with whom to raise safeguarding concerns for our schools.
- Supporting the Headteacher to Ensure Safe Practice in school.
- Managing safeguarding referrals to the Local Authority; Police and any other statutory authorities or multi-agency risk management arrangements (see Designated Safeguarding Lead Response).
- Working closely with the Proprietors, Headteacher and relevant senior leadership team members to ensure a whole school safeguarding culture and ethos as outlined in our Safeguarding Statement and the implementation of effective safeguarding arrangements, as outlined in this policy.
- Acting as the point of contact to and proactively engaging with the Cumberland Safeguarding Children Partnership arrangements as outlined in Working in Partnership.
- Ensuring children and parents are aware of how they will be encouraged to raise safeguarding concerns and how they will be responded to as outlined in Working in Partnership.
- Acting as a source of support, advice, and expertise to all staff; including ensuring that there is ongoing promotion and awareness of safeguarding and children protection in school.
- Ensuring the effective management and oversight of safeguarding information as outlined in Record Keeping and Information Security.
- Maintaining and ensuring access to Professional development and support.
- Making and recording decisions to share, or not share, information under the Information Sharing Duty, including any decision that sharing would be more harmful to the child than not sharing, which is agreed with the Headteacher. Responding promptly to requests for information from other relevant organisations.
-

All staff (including students and volunteers):

Are expected to work in line with our Safeguarding Statement and adhere to the policies, processes and systems that support safeguarding as outlined in this policy. This specifically includes:

- Accessing and maintaining Professional development and support to ensure they remain knowledgeable and confident in their safeguarding practice.
- Recognise, Respond and Report Staff Safeguarding Concerns
- Engaging in Safe Practice. This includes raising concerns (however small) about individual behaviour or practices or cultures in schools that compromise the safety of children as outlined in Ensuring safe staff.
- Teaching our children how to keep safe

Professional development and support

To ensure all our staff and proprietors are knowledgeable and confident in keeping children safe in our schools; they will complete the professional development activities as outlined below. We monitor professional development activities and maintain professional development records.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead(s) provide all staff with ongoing safeguarding support, advice, and expertise, usually through staff meetings. Staff safeguarding knowledge and competence is overseen as part of the staff induction, appraisal, and performance processes in school. The Designated Safeguarding Lead (and deputy(ies)) receive regular support and supervision through Cumberland DSL networks and CSCP training.

All Staff (including volunteers)

Activity	Frequency
Receive information on school safeguarding arrangements and procedures as outlined in KCSiE 2026 (Part 1: page 8-9, paragraph 11 and 12).	Induction and each September

Read Keeping Children Safe in Education (KCSiE): • **All Staff:** Part 1; Part 5 and Annex A. • **Senior Leadership Team:** Entire document • **Staff who do not work directly with children: Part one**	Induction then annually (in September INSET) or when updated.
Complete Safeguarding Awareness Training to enable staff to recognise, respond to and report safeguarding (including online safety and child-on-child abuse) concerns.	Induction, staff meeting updates and formally every 3 years
Teaching staff only: Complete FGM training appropriate to role *(see Local Authority Safeguarding in Education Training Statement at: the CSCP training pages)*	Induction and then every 3 years
Complete Prevent Awareness Training appropriate to role. *The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)*	Induction and then refreshed annually
Complete Cyber Security Training *Cyber security training for school staff - NCSC.GOV.UK)*	Induction and then annually through our DPO and CEOP ambassador
Receive regular national and local safeguarding updates (including those relating to online safety).	As available, using CSCP updates and DfE safeguarding updates.
SLT members who are not trained DSL's, complete safeguarding training which equips them to hold the knowledge to fulfil their role.	Every three years.
Briefing on the Information Sharing Duty: no threshold, no asking permission, passing concerns to the DSL the same day	Autumn term 2026, then at induction and in the annual safeguarding update

Designated Safeguarding Leads (including any deputies)

Activity (in addition to all staff above)	**Frequency**
Complete Schools Designated Safeguarding Lead Training to a standard as outlined in KCSiE Annex B	On induction in role and then every 2 years
Read Keeping Children Safe in Education in its entirety.	Induction into role then annually (in September) or when updated.
Complete Prevent Referral Training *(training packages at: The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk) . and DSL specific packages (including Independents) at Regional Prevent education co-ordinators - GOV.UK*	On induction and then every 2 years
Complete Brook Traffic Light Training to support assessment of children's sexual behaviour (including harmful sexual behaviour, child-on-child sexual harassment and violence) *(Brook Traffic Light training is the locally expected training as outlined in Local Authority Safeguarding in Education Training Statement at the CSCP training pages.*	On Induction into role and then every 2 years
Complete Operation Encompass Online National Key Adult Training	At least once and before Operation Encompass referrals can be received.
Maintain knowledge and development relating to the role of DSL; including keeping up to date with local arrangements	As required, but at least annually
Read the Information Sharing Duty statutory guidance (DfE, September 2026) in full	On induction into role, then annually or when updated

Proprietors

Activity	**Frequency**

Complete Safeguarding Training to equip them with the knowledge to carry out their strategic Roles and Responsibilities.	Induction and then every 3 years.
Read Keeping Children Safe in Education • **All Proprietors:** Part 1; Part 2 and Annex A. • **Chair & Safeguarding Link Proprietor:** Entire document	Induction into role then annually (in September) or when updated).
Complete Cyber Security Training *Cyber security training for school staff - NCSC.GOV.UK*	Induction and then annually
Complete Prevent Awareness Training appropriate to role *The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)*)	Induction and every two years

Staff/Proprietors involved in recruitment of staff (including administration)

Activity (in addition to other relevant above)	**Frequency**
Read Part 3: Keeping Children Safe in Education	Induction into role then annually (in September) or when updated.
Complete appropriate safer recruitment training (that is in alignment with Part 3 KCSiE)	Induction and every 3 years (or when KCSiE Part 3 is updated)

Ensuring Safe Practice

Safer recruitment

We adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in our setting. Lead staff/proprietors involved in recruitment complete additional safer recruitment training; as outlined in Professional development and support. Our recruitment procedures are outlined in our Staff Recruitment and Selection Policy and are in alignment with Keeping Children Safe in Education 2026: Part 3.

As part of our recruitment and selection processes; we ensure that our commitment to safeguarding and promoting the welfare of children is evident to candidates throughout each stage of the process; with any candidate who is not suitable to work with children being deterred and identified at the earliest point. This information is included on the application information for candidates. We also ensure that all applicants complete a robust application form. We seek suitable references and carry out online social media checks; as well as ensure that there is a focus on the candidate's knowledge, competency and values in safeguarding practice as part of the interview processes.

We maintain a record of information we have received to confirm the necessary pre-appointment safer recruitment checks are completed on staff (including volunteers, supply staff and salaried students); Proprietors and visitors who attend our school in a professional capacity. Contractors are supervised when on site. We complete the checks on staff, volunteers, and Proprietors who we recruit ourselves. For those who are recruited by others; (such as supply staff and fee-funded students) we ensure that we receive written confirmation of the relevant checks completed and check their identification before they are allowed to work unsupervised or engage in regulated activity with children.

Following the Crime and Policing Act 2026, the supervision exemption no longer applies. Any volunteer who teaches, trains, instructs or supervises children once a week or more, on four or more days in any 30-day period, or overnight, is in regulated activity even when supervised, and will have an enhanced DBS check with barred list check before they start.

Where we do not have all the necessary information or there are gaps in the information; we have robust risk assessment processes in place to ensure that anyone who does not meet the required standards of pre-appointment checks or suitability are not allowed to work unsupervised or engage in regulated activity with children. We reserve the right to refuse access to the school site for any person who we are not assured is safe to work at or visit our school or engage in regulated activity with children.

On appointment; staff (including volunteers) receive a robust induction programme which provides them with the relevant safeguarding knowledge but also clarity on the expected standards of behaviour within and outside of school. Please see Professional development and support.

If any safeguarding concerns of allegations arise relating to a member of staff, proprietors or other person working on our school premises; staff are expected to act in line with Ensuring safe staff and Staff Safeguarding Concerns: Recognise, Respond, Report.

Contractors

We occasionally have agreements with external providers to work in our school most often when completing assessments for our students e.g. Educational psychologists. In these instances we request to see ID and DBS (may include the update service check) information and usually supervise their activity with our children.

We will follow our Ensuring safe staff procedures if we become aware of any allegations relating to a contractor.

Visitors

We have a range of visitors to our school; including professional visitors, children's family members or others attending school events. All visitors to our school are expected to act in accordance with our Safeguarding Statement. Our Headteacher can use their professional judgment and decide whether any visitor is allowed access to the school site or needs to be escorted or supervised. We ensure that we have control over who comes into the premises so that no unauthorised person has unsupervised access to children.

We check the identification of visitors and make sure that professional visitors who attend our school have had the appropriate DBS check depending on the activity they are there to carry out; or that the visitor's employers have confirmed that their staff have appropriate checks. We do ask to see DBS certificates when we have received the necessary confirmation.

When external speakers or visitors attend our school premises we conduct due diligence checks to ensure that their views and delivery of material continues to ensure our school is a safe place. This continues to ensure we are Teaching our children how to keep safe; as well as promoting fundamental British Values and community cohesion (please also see Preventing Radicalisation).

We will follow our Ensuring safe staff procedures if we become aware of any allegations relating to a professional visitor.

Visitors to school will have their ID checked on arrival and if appropriate (depending on purpose of visit) their DBS checked. The school asks speakers to read and sign our visiting speakers policy.

Work experience

We have processes in place to ensure that individuals or companies who provide work experience placements for our children have appropriate safeguarding policies and procedures in place. We ensure that any adults who are supervising children on work experience have the appropriate checks carried out as required by "Keeping Children Safe in Education 2026: Part 3: Adults who supervise children on work experience".

If a child's work experience placement is in a "specified place" where regulated activity is carried out (such as an education or childcare setting); we will work with the provider to ensure that the appropriate checks and/or risk assessments are carried out. Where we host a student aged 16 or over on work experience whose placement gives them the opportunity for contact with our pupils, we will consider whether they are engaged in regulated activity and carry out the checks required by Keeping Children Safe in Education 2026 Part 3.

Students and their carers/parents are prepared for their work experience placements on an individual basis, so that they are made aware of what behaviour is expected; as well as how and who to raise any concerns to.

Use of school premises for non-school activities

When we have arranged extra-curricular activities out of school hours which are directly supervised or managed by school staff, this safeguarding policy is to be followed and any concerns should be managed in accordance with Staff Safeguarding Concerns: Recognise, Respond, Report and Designated Safeguarding Lead Response.

We will follow our Ensuring safe staff procedures if we become aware of any allegations relating to an organisation or individual using our school premises.

Where we have sessions or activities which are provided by another person or organisation that is using the school site and not during school time or under direct supervision, we seek assurances that they have the required child safeguarding arrangements in place as an individual/organisation as outlined in Keeping children safe during community activities and visitors. This is regardless of whether children who are on roll at our school access the activity or not.

The arrangements for this will be set out within any transfer of control agreement, (i.e. lease or hire agreement); and failure to comply with these arrangements will lead to termination of the agreement.

Alternative provision

Where we place a child with an alternative provision provider, we continue to be responsible for their safety and welfare and should be satisfied that the provider can meet the needs of the pupil. We do this by completing a thorough visit of the provision, speaking with those providing activities and completing our alternative provider checklist.

Where we are using a service such as transport we obtain written confirmation from the provider that appropriate safeguarding checks have been conducted on individuals i.e., those checks that the school would otherwise perform in respect of its own staff. See Appendix E: Alternative Provision Quality Assurance Checklist.

Ensuring safe staff

Staff are expected to act in line with this section when any safeguarding concerns or allegations arise for the following:

- Employed staff
- Supply Staff
- Trainee teachers
- Volunteers
- Proprietors
- Contractors
- Professional Visitors
- Organisations or Individuals using school premises for non-school activities

As further outlined in Roles and Responsibilities the Headteacher, with the oversight of the Proprietal Body, is responsible for ensuring the safety of the staff and volunteers working for, at or on behalf of our school; irrespective of whether they are employed by us or another employment agency or business/charity.

In some circumstances we will have to consider an allegation against an individual not directly employed by us; for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business/charity. Where this applies, we share safeguarding responsibilities with the employment agency or business/charity.

Supply teachers, trainee teachers and all contracted staff
We have safeguarding responsibilities when it comes to supply teachers, trainee teachers and all contracted staff and will follow Keeping children safe in education Part 4: supply teachers, trainee teacher and all contracted staff.

Professional Visitors and Organisations or Individuals using school premises for non-school activities
When allegations that meet the harm threshold against individuals are made against professional visitors or Organisations or Individuals using school premises for non-school activities ; we will contact the Manager of individual concerned and contact the Local Authority Designated Officer (and if necessary the Police) in accordance with CSCP Allegations Against Staff or Volunteers procedure

When any allegations or concerns that do not meet the harm threshold (for example where an individual has not acted in according with our expected standards for Visitors or agreement of Use of school premises for non-school activities); we will report concerns to the Line Manager for the Professional Visitor or the Manager of the Organisation using our premises.

Outcomes arising from concerns raised may impact on decisions to allow professional visitors back on the school site or termination of agreements with agreement of Use of school premises for non-school activities

Managing allegations (including low level concerns)
We promote an open and transparent culture in which all concerns about the behaviour or conduct of any adults working in, at or on behalf the school are dealt with appropriately.

There are two levels of allegations / concerns:

1. Allegations that may meet the harm threshold.

Circumstances where someone working within the school has or may have:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes any behaviour that may have occurred outside of the school that could pose a transferable risk.

Allegations that someone working in, at or on behalf the school has met the harm threshold should be immediately referred to the Headteacher in person. Staff may be required to provide a written statement at the request of the Headteacher.

If the allegation relates to the Headteacher; this should be immediately verbally reported to the Proprietor with responsibility for schools.

If there is any conflict of interest or immediate risk of harm to a child or; then the person with the concern must ensure Immediate safety and contact the schools DSL and in partnership the Local Authority Designated Officer in accordance with CSCP Allegations Against Staff or Volunteers procedure

In most cases, the Headteacher or the Proprietors will lead on managing allegations; with the support of the Human Resources Department and the Designated Safeguarding Leads. They will ensure that Part 4 Keeping Children Safe in Education 2026 and CSCP Allegations Against Staff or Volunteers procedure are applied. Any allegations that meet the above criteria will be referred to the Local Authority Designated Officer within 1 working day and we will follow their advice and guidance.

It is essential that any allegations of abuse against a member of staff are dealt with quickly, in a fair and consistent way to effectively safeguard all those involved.

We also have a duty of care towards our staff, and we will provide a named contact for the staff member.

If necessary, we will adhere to our legal reporting duties (such as referring to the Disclosure and Barring Service or Teaching Regulation Agency) as employers as outlined in Part 3 Keeping Children Safe in Education if the criteria for such reporting is met.

2. Allegations / concerns that do not meet the harms threshold (Low level concerns).

The term low level does not mean that these concerns are insignificant. A low-level concern is when staff or volunteer may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Our staff code of conduct outlines examples of what could be considered a low-level concern;
- Does not meet the harm threshold at point 1 above.

Low level concerns should be reported in person to the DSL and/or Headteacher; to embed our culture of openness and transparency. To ensure that our school's values and expected behaviours are lived, monitored, and reinforced by all staff.

The DSL and/or Head Teacher will gather as much information as possible. The Headteacher will decide the outcome of all low-level concerns (in consultation with the Designated Safeguarding Lead if necessary) raised in line with the staff code of conduct, whistle blowing policy etc. Consideration will be given to whether there is a pattern of behaviour by the individual; or if there is a wider school culture issue and if policies need to be revised, or if all staff guidance or additional staff training is required.

Whistle Blowing
Whistleblowing is the mechanism by which staff can raise concerns about poor or unsafe practice, wrongdoing and/or potential failures in the school's arrangements in good faith without fear of repercussions. All staff have a duty to raise concerns about malpractice or wrongdoing where this is impacting on the safety and welfare of children. If staff have such concerns; these should be raised with the DSL and/or Headteacher within each school.

If staff feel unable to raise concerns with the school directly; they can contact NSPCC Whistleblowing Advice Line.

Record Keeping and Information Security

We have a legal duty to act in line with the data protection laws. We have data protection processes in place to ensure that we keep and process (manage) personal information about children, their families; staff and others safely and lawfully. This includes:

- Securely manage electronically held information in line with Meeting digital and technology standards in schools and colleges (see also Online Safety)
- Manage requests for access to personal information we hold (known as subject access requests).

Details of our processes and how to request access to personal information we hold are outlined in our Data Protection and GDPR policy.

Storage and management of safeguarding information (child protection files)

Child Protection files are stored individually for each child and access is appropriately restricted to those requiring it.

The Designated Safeguarding Lead is responsible for ensuring the quality, maintenance, and management of child protection files; as well as using the recording system to monitor themes and patterns of concern to inform and continue to improve the whole school approach to safeguarding.

The Designated Safeguarding Lead will ensure that child protection files meet the standards set out in Keeping Children Safe in Education Part 2 and Annex B and KCSIE 2026 Annex B (child protection files) as well as to enable analysis of information held on the child protection file to inform their response[1] including:

- Ensuring all safeguarding concerns, actions and decisions made and the rationale for those actions/decisions are clearly and factually recorded on the child protection file.

- Ensuring the recording of professional opinion is clearly explained (for example concerns raised due to observations of established signs and indicators, or actions or decisions taken based on evidence-based assessment/tools; such as those outlined and linked in the local Framework for Action)
- Where child protection files contain extensive historical information, ensuring that records are organised so that:
    - Significant/key events that have had an impact on the child can be clearly identified and reviewed *CSCP procedures*
    - patterns of repeated concerns and/or cumulative harm[2] can be clearly identified.

  This will enable the Designated Safeguarding Lead to provide a structured summary of current risk, relevant context and ongoing support needs either:

    - as part of Sharing safeguarding information with others when responding to safeguarding concerns (for example referrals to Family Help or Child Protection) and/or
    - when carrying out Transfer of child protection files and other safeguarding information to another education provider or for statutory Local Authority education notification processes (such as children missing education or who have become electively home educated). As well as transferring the child protection file, the DSL shares relevant concerns with the receiving local authority when a pupil moves to another area in England, including a looked after child returning to their placing authority.
    -
- Ensuring records are only accessed or shared with those who need to see it in line with data protection laws and Sharing information with others

Sharing safeguarding information with others

Data protection laws and principles allow us to store, share (and withhold) personal information as follows:

- Safeguarding information contained on the child protection file and any other information we hold for safeguarding purposes is 'special category personal data'.
- 'Safeguarding of children and individuals at risk' is a processing condition that allows us to share safeguarding information without consent. Since 30 September 2026 we also have a legal duty to share relevant information under section 16LA of the Children Act 2004; as further explained below.

We will seek the advice of our Data Protection Officer and the Information Commissioner's Office when necessary.

We are proactive in sharing information with each other and others who are working with our children and their families as early as possible; so that children can receive the help and support they need; respond to any safeguarding concerns and where possible prevent abuse, neglect, and exploitation.

Staff are expected to share information with one another as part of their work in school about the needs and risks of children on a need-to know basis in line with our Safeguarding Statement so that we keep children safe and promote their welfare. They are not permitted to share information with friends, family, or anyone in the local community outside of their work.

[1] Assessments: learning from case reviews | NSPCC Learning

[2] For further guidance see A Practitioner's Quick Guide to Cumulative Harm

Sharing information with other organisations

Staff should be familiar with and use:

- Information sharing advice for safeguarding practitioners (2024, non-statutory: use only where it does not conflict with the Information Sharing Duty statutory guidance).
- Sharing personal data with law enforcement authorities | ICO
- Information Sharing Duty: statutory guidance for safeguarding organisations and their practitioners (September 2026), in force from 30 September 2026 under section 16LA of the Children Act 2004.

As part of our work in partnership with parents and children, we will normally be open with children and their parents/carers about what we share and why, unless it is not safe to do so. Consent is not required to share safeguarding information under data protection law or the Information Sharing Duty, and staff must never delay sharing to seek it. We will not tell children or parents in advance where doing so would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If a parent or child objects to information being shared, we will still share it where the Information Sharing Duty applies, because consent is not the legal basis for sharing (see The Information Sharing Duty). Where this happens, staff will explain to parents and children why the information still needs to be shared, unless it is not safe or possible to do so.

Decisions to share safeguarding information with other organisations (including Transfer of child protection files and other safeguarding information) will be overseen by either the Designated Safeguarding Lead (please also refer to Designated Safeguarding Lead Response) and/or (and always in the case of Ensuring safe staff) the Headteacher.

When deciding what information to share, consideration will be given to:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving organisation to know, and
- whether it is clearly presented and appropriately contextualised (see Storage and management of safeguarding information (child protection files)) .

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. But care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk.

Transfer (including receipt) of child protection files and other safeguarding information
The Designated Safeguarding Lead is responsible for ensuring that safeguarding information is transferred, reviewed and actioned promptly at all transition points in a child's educational journey; including in-year moves. They will use KCSIE 2026 Annex B (child protection files) to guide their practice approach.

When a child leaves for a new education setting (including in-year moves); the Designated Safeguarding Lead will arrange for the child protection file (and any additional information to help the new setting to help safeguard and promote the child's welfare) to be transferred to the new setting no later than within 5 working days of an in-term transfer or within 5 days from the start of the new term.

Where the move is planned; the Designated Safeguarding Lead will consider sharing information (which could include a conversation with the Designated Safeguarding Lead in the new provision) in advance of the child leaving to help with the child's transition and to enable any help, support or protection they may need; and/or where it would support assessment of risk to others in the school (for example where the

child's behaviour causes safeguarding concern). Safeguarding information should be used to support, not disadvantage, the child.

Child protection files and any other safeguarding information is shared separately to the child's main file and by secure means. Confirmation of receipt of the files should be gained.

The file transfer will include a clear, structured summary identifying current safeguarding concerns, relevant context, and any ongoing support needs. File transfers for Children potentially at greater risk of harm and/or whose files contain extensive historical information will include an Enhanced Transition Summary Form

If a child is absent from education or Electively Home Educated; we share relevant information with the Local Authority as required by law (please see Children potentially at greater risk of harm). If the child leaves our setting and does not move to a new education setting; we transfer their child protection file (and any additional information as necessary) to the relevant Local Authority that they reside in line with the local protocol.

The Designated Safeguarding Lead will be notified of all children due to start at the school prior to or (in exceptional circumstances) on the date they start. The Designated Safeguarding Lead will be promptly notified of and review any safeguarding information shared to ensure they:

- Understand key risks and needs, relevant context and any ongoing support needs for the child.

  Where information indicates a risk to others and/or the individual child (for example if a child's behaviour causes safeguarding concern) the Designated Safeguarding Lead will work closely with the relevant School staff to respond and assess the risk to both the individual pupil and others in the school; to put in place a safety and support plan in place.
- Identify any unclear, incomplete or missing information and seek clarification from the sending provider to ensure effective safeguarding.

  If the child protection file has not been received as required by Keeping Children Safe in Education Part 2 and Annex B; then the Designated Safeguarding Lead will use the CSCP Escalation Policy (or applicable Child Safeguarding Partnership Escalation Policy for the Local Authority area that the sending provider is based).
- Share safeguarding information as required with key staff including Deputy Designated Safeguarding Leads, SENCOs or other staff who need to know. See also Children potentially at greater risk of harm.

The Information Sharing Duty

The duty. Since 30 September 2026 Old Windebrowe has a legal duty under section 16LA of the Children Act 2004 to share information it holds about a child, or about another person connected to that child, where we consider the information is relevant to safeguarding or promoting the child's welfare and that sharing it may help another relevant organisation to assess need or risk, make a decision, provide support or take action. Relevant organisations include local authority children's social care, the police, health services, youth justice services and other schools and education settings. The duty applies in the same way when one of those organisations asks us for information.

No threshold. Information is shared whether or not the child meets the threshold for a child protection enquiry, a Child in Need assessment or any local threshold. The duty covers early help, emerging needs and prevention as well as risk of harm. Staff never wait for a concern to "meet threshold" before passing it to the Designated Safeguarding Lead (DSL).

Consent. Consent is not needed to share information under the duty, and it is not needed under data protection law or the common law duty of confidentiality when the duty applies. Staff will not ask a child or parent for permission to share where the school will share anyway, because that gives them a choice they do not have. Instead, where it is safe and practicable, the DSL tells the child and their parents or carers what is being shared,

with whom and why, in a way that suits the child's age, understanding and communication needs. Where telling the family would increase risk to the child or anyone else, we do not tell them, we record why, and we let the receiving organisation know the family is not aware.

Deciding whether to share. The DSL, or a Deputy DSL in their absence, considers three questions:

1. Is the information relevant to the child's safety or welfare?

2. Is the recipient covered by the duty, and could the information help them safeguard or promote the welfare of the child, including where the child may pose a risk to others?

3. Would sharing be more harmful to the child than not sharing, and can that harm be reduced by sharing less detail?

When we will not share. We will only decide not to share in rare cases where sharing would be more harmful to the child than not sharing. This would normally mean that sharing would put the child at immediate risk of harm, would undermine a police investigation in a way that increases the risk to a child, or would breach a Family Court order or the Family Procedure Rules. Before deciding not to share, the DSL will consider whether a reduced or summarised version can be shared instead. Any decision not to share is agreed with the Headteacher, recorded with the reasons and reviewed, and the information is shared as soon as the risk allows.

The following are not reasons to withhold information: no consent from the child or family; a parent objecting; fear of a complaint or criticism; a member of staff feeling unsure or uncomfortable; or general data protection concerns. A member of staff who is unsure speaks to the DSL the same day.

Information about other people. The duty covers information about adults and other children in a child's life where it is relevant to that child's safety or welfare, for example a parent's circumstances that affect their care of the child, or a peer who may pose a risk. Information about a pupil who may pose a risk to other children is shared under the duty even where that pupil is not at risk themselves. We also consider that pupil's own needs when we share.

Requests from other organisations. Any request for information from another relevant organisation is passed to the DSL on the day it arrives and answered promptly. We share the relevant information, extracted or summarised where that is enough, rather than whole files, unless the full record is necessary and proportionate. When we ask another organisation for information, we give them enough context to decide what is relevant.

Information we receive. Information shared with us under the duty is used only for safeguarding and promoting children's welfare. The DSL acknowledges it and, where appropriate, tells the sender what action we have taken.

Moving between areas. When a pupil moves to another school or area in England, the DSL shares relevant safeguarding information with the new setting and, where relevant, the receiving local authority, as well as transferring the child protection file. A data sharing agreement is not needed before sharing under the duty, and the lack of one will never delay it. Sharing with services in Scotland, Wales or Northern Ireland falls outside the duty and is done under data protection law.

Learners aged 18 and over. The duty applies to children under 18. For learners aged 18 or over we share information through our adult safeguarding procedures.

Emergencies. Where a child is at immediate risk, staff share what is needed at once with the police or children's social care and record their decision afterwards.

Recording. Every decision to share or not to share is recorded on Arbor: what was shared, with whom, when, the reasons against the three questions above, and whether the child and family were told. Opinion is recorded as opinion and kept separate from fact.

Local arrangements. We share information through the routes agreed by our local safeguarding partnership and set out in Appendix E: Local information sharing arrangements, and in line with the partnership's data sharing agreement once it is revised for the duty. For a child who lives in another area, we use that area's routes.

Data protection. Sharing under the duty is lawful under data protection law. Our lawful basis is Article 6(1)(c) UK GDPR (legal obligation under section 16LA of the Children Act 2004). For special category data we rely on Article 9(2)(g) UK GDPR, and for criminal offence data on Article 10 UK GDPR, together with Schedule 1, paragraph 18 of the Data Protection Act 2018 (safeguarding of children and individuals at risk). Information is limited to what is necessary, accurate and sent securely. Staff unsure about a data protection point ask the DSL or the Data Protection Officer, but that question never delays sharing.

Other duties to share. The Information Sharing Duty sits alongside our other legal duties to report, including the mandatory reporting of female genital mutilation. When the mandatory duty to report child sexual abuse under the Crime and Policing Act 2026 comes into force, this policy will be updated to include it.

Working in Partnership

As is outlined in our Safeguarding Statement; and in order to ensure all children in our schools are effectively safeguarded and their welfare is promoted; we will work in in partnership with our children, their parents/carers and other agencies/partnerships as follows:

Children

Our children are taught how to keep safe; including how and when to share or report to us any worries or concerns they may have about their safety and wellbeing or that of others. We encourage children to share and report worries and concerns by:

- Telling them they can share information with us
- Teaching them about healthy relationships and when to raise concerns

Staff are expected to build trusted relationships with and work in the best interests of children in line with our Safeguarding Statement; and recognise, respond and report Staff Safeguarding Concerns.

We also actively seek children's views of safety in school through student council and out tutorial systems.

Parents/Carers

We recognise the importance of working together with and supporting parents/carers to safeguard and promote the welfare of their children. This includes:

- Communicating to parents/carers how we keep children safe in our schools (including online). This information is made available to all parents on our website. If parents/carers want to raise concerns or complaints about how we keep their children safe; they can do this using our Complaints Policy which is available on our website. We also actively seek parent/carer feedback in our annual questionnaires.
- Encouraging parents/carers to share and report worries and concerns about the safety and welfare of their child(ren) or any other children. We do this by ensuring regular contact with parents/carers in daily/weekly ring arounds. Staff are expected to respond to any parents/carers who raises worries or concerns to them either about their child(ren) or others in line with Staff Safeguarding Concerns: Recognise, Respond, Report .
- The Designated Safeguarding Lead will ensure that we work with parents/carers to offer and enable support for children and their families; taking action to safeguard and promote their welfare (see Designated Safeguarding Lead Response) in line with the local arrangements in the area that they live.
- Providing parents/carers with regular information, guidance and information about external support available to them by signposting in regular review meetings (PEP's/LASC's etc).

Other agencies/partnerships

As we operate in Cumberland; we engage and co-operate with our local safeguarding arrangements. Our local safeguarding partnership is the Cumberland Safeguarding Children Partnership (CSCP). We engage and co-operate by:

- Ensuring we effectively safeguard and promote the welfare of children living in Cumberland in line with Working together to safeguard children and the Cumberland Multi-Agency Thresholds Guidance. Where children do not live in Cumberland but attend our schools; we will work in line with the relevant local arrangements in their home area.
- Ensuring we work with other agencies and comply with other pieces of relevant statutory guidance in safeguarding Children potentially at greater risk of harm.
- Supplying information and co-operating in multi-agency forum/meetings, audit or learning reviews as requested by the safeguarding partners.
- Working closely with Cumberland Council education and inclusion services and other Cumberland Council services to ensure we are providing high quality education and support to children in Cumberland.
- Working with virtual schools to support children in care/with a social worker, care experienced children, children in kinship care and children who previously had a social worker.
- Participating in the local Operation Encompass Protocol; an arrangement where police have a legal duty to notify schools if they have reasonable grounds to believe a child attending the school may be a victim of domestic abuse. This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently. This enables us to provide appropriate emotional or practical support to a child/ren who may have been witness to and victim of domestic abuse. All new parents/carers are sent a letter informing them of our participation in Operation Encompass School Operation Encompass – Cumbria Police).

Teaching our children how to keep safe.

We recognise that educating our children in how to keep themselves and others safe both online and in face-to-face situation plays a crucial role in safeguarding them. We have a clear set of values and standards that provide opportunities for children to learn how to keep themselves and others safe; that are demonstrated and reinforced throughout school life and underpinned through -

- Safeguarding Statement
- Positive Behaviour/Preventing Bullying Policy
- Preventing Radicalisation
- Our approach to Online Safety
- Our Personal Social Health Education and Computing curriculum and policies including our RSHE Policy. Our RSHE programme is developed to be fully inclusive of all ages and stages of development and consideration of children's needs including Children potentially at greater risk of harm; and addresses issues as outlined Keeping Children Safe in Education 2026; Part 2: Opportunities to teach safeguarding.

The DSL, RSHE lead and other key members of the Senior Leadership Team (such as Computing teacher, Mental Health and SENDCo) will work collaboratively to ensure that this is implemented; and being responsive to any safeguarding themes or patterns of concern that arise in school.

Online Safety

The use of information and communication technology (ICT); is a vital part of the everyday functioning of and life in school. We also recognise the important role ICT plays in the lives of our children and their families.

Whilst there are many benefits and strengths in using ICT; there are also a number of risks to children's welfare and safety in school when using internet enabled technology; as outlined in the following categories:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes**.**
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images including those generated using AI and online bullying,
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

We adopt a whole school approach to online safety which aims to safeguard and educate our children and their families, staff, visitors and our school in our use and management of ICT (including the use of Artificial Intelligence, camera enabled mobile and personal devices and the ICT systems we have in place).
Please see our related policies; acceptable use policy, CCTV policy, AI policy, filtering and monitoring schedule.
Old Windebrowe School is a mobile phone-free environment by default. Pupils do not have access to their mobile phones at any point in the school day, including lessons, the time between lessons, break and lunch, unless an individual exemption has been agreed and risk assessed. See our Mobile Phone Policy.

Our Online Safety Policy outlines our approach as to how technology is used, by who and when including:

- The use of mobile phones, cameras and other electronic devices with imaging and sharing capabilities *in line with Mobile phones in schools*
- Filtering and monitoring systems which are in line with digital and technology standards for Filtering and monitoring and include:
    - Identification and assignment of roles and responsibility to manage filtering and monitoring systems.
    - Reviewing filtering and monitoring at least once every academic year, led by the SLT member responsible for filtering and monitoring (Trevor Marsden) with the DSL and IT support, including checks that filtering works on all internet-connected devices in all relevant locations, with a record kept of the checks
    - Blocking harmful and inappropriate content without unreasonably impacting teaching and learning
    - Ensuring effective monitoring strategies in place that meet our safeguarding needs.
- Reference to our Cyber security arrangements that ensure information security (see also Record Keeping and Information Security), reduce the risk of disruption and mitigate safeguarding risks These are in line with digital and technology standards for Cyber Security and take account of Schools | National Cyber Security Centre *Please also be aware of Image guidance for education settings - UK Safer Internet Centre*

  Any school cyber security incidents will be reported to Action Fraud (National Fraud and Cyber Crime Reporting Centre) and, if there is a data breach this will be reported in line with our Data Protection Processes to the Information Commissioners Office.

- The use of Generative Artificial Intelligence (AI). We use Generative AI in line with Generative AI: product safety standards and ensure we understand and help our children to understand the safe use of Generative AI. *Refer to Generative artificial intelligence (AI) in education - GOV.UK and the New Reflexions AI Policy (Microsoft Copilot is currently the only approved AI tool)*.
- Ensuring children are taught how to use technology (including Generative AI) safely. As further outlined in Teaching our children how to keep safe.

- Where children are being asked to learn online at home, we follow advice from the Department of Education; Safeguarding and remote education .
- All Staff, senior leaders and Proprietors are appropriately trained (see Professional Development and Supervision) to enable them to ensure effective online safety arrangements. We will respond to online safety incidents which indicate safeguarding concerns in line with the Staff Safeguarding Concerns: Recognise, Respond, Report and Designated Safeguarding Lead Response sections of this policy.

Reviewing online safety

We review our online safety arrangements at least annually to ensure that we meet the online safety standards outlined in Keeping children safe in education

Including ensuring adherence to:

- digital and technology standards for Filtering and monitoring and Cyber Security
- Generative AI: product safety standards

We record the outcomes of our reviews including any risks. Risks and actions arising are added to our school evaluation and improvement action planning processes and reported to and overseen by our Proprietors.

Preventing Radicalisation

The Prevent duty (Prevent duty guidance: England and Wales, 2023 edition) under section 26 of the Counterterrorism and Security Act 2015; places a duty on schools and registered childcare providers to have due regard to the need to prevent people from being radicalised into terrorism. We have a Prevent risk assessment in place.

We fulfil our duty by:

- Promoting fundamental British Values as part of our values and curriculum (see curriculum intent policy and SMSC policy).
- Ensure that we provide a “safe space” for children to understand and discuss sensitive topics, those linked to radicalisation and terrorism, and learn (according to their age and level of development) how to question and challenge these ideas in a politically balanced way.
- Be alert to and identify children who may be *susceptible to radicalisation into terrorism* and where it is assessed as appropriate by the *Designated Safeguarding Lead*; make a Prevent referral (in line with the local *Preventing Terrorism Processes*)
- Monitor and report any hate based behaviour as part of our Behaviour and Child-on-Child records kept on our school information management system.
- Outlined in our Relationship Sex Health Education Policy (Note July 2025 updates for Sep 2026) and curriculum intent policy how children are being safeguarded from being drawn into terrorism (including our visiting speakers, see policy).
- *Ensure that hosting external speakers or visitors that attend our school premises are suitable and appropriately supervised (please also refer to Visitors)*
- Assess the risk of our children being drawn into terrorism, ensuring this is informed by the potential risk in the local area. Any identified risks are explored further in staff meetings to ensure awareness.

We regularly review our adherence to the Prevent Duty. Any actions arising from our considerations are included in our board report, so they can be overseen by our Proprietal Body.

All Staff, senior leaders and Proprietors are appropriately trained (see Professional Development and Supervision) to enable them to ensure that all children, particularly those who may be susceptible to

radicalisation are effectively safeguarded. We respond to children who are identified as being susceptible to radicalisation in line with the Staff Safeguarding Concerns: Recognise, Respond, Report and Designated Safeguarding Lead Response sections of this policy.

Children potentially at greater risk of harm

We recognise that whilst all children should be protected, some groups of children, are potentially at risk of greater harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups. Where a child falls into multiple groups; this potentially further increases their vulnerability.

Children who need Local Authority social care (Child in Need and Child Protection Plans).

If a child needs Local Authority social care, as a child in need or because of child protection concerns, they are more vulnerable to harm/further harm and may face barriers to attendance, learning, behaviour and mental health.

The Designated Safeguarding Lead will be informed (if they are not already aware/have referred a child) when a child needs Local Authority Social Care. They will be a part of the core group of agencies (known as the core group) to so that decisions can be made in the best interests of the child's safety, including ensuring that the child's educational outcomes are promoted.

We ensure that appropriate staff members have access to the information they need in relation to a child's looked after legal status, contact and care arrangements to ensure that they are aware of their greater level of vulnerability and ensure their educational outcomes are promoted.

Looked After Children and previously looked after children (including care leavers)

The most common reason for children becoming looked after is as a result of abuse and/or neglect; as well as/or other significant complexities or adversity in their and their family's life.

New Reflexions schools provide for many Looked After Children and therefore close working relationships with social care are vital. We attend LAC reviews and PEP meetings to ensure these young people's cases are regularly reviewed and that they have a regular space to be heard, whether in the meeting or as part of the review process.

Some pupils live in the New Reflexions children's home on the Old Windebrowe site, which is registered and inspected separately under the Children's Homes Regulations. The DSL works closely with the home's Registered Manager, Cumberland as the host local authority, and placing authorities on any shared safeguarding concerns.

Our schools have an appointed designated teacher who works with the local authority to promote the educational achievement of registered pupils who are looked after in line with *Statutory guidance - Designated teacher for looked-after and previously looked-after children*

Children who attend part time Alternative Provision

Where we place a child with an alternative provision provider for part of their timetable, we continue to be responsible for their safety and welfare and should be satisfied that the provider can meet the needs of the child. We do this by sending children with one to one staffing or, where this is not in place, receiving daily attendance checks and by carrying out our alternative provider checks.

We obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been conducted on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. See our record of checks.

Children who are absent from or are not in receipt of full-time education

Education is essential for children's progress, wellbeing and wider development and being in school is a protective factor against wider harms, including exploitation.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, sexual exploitation or child criminal exploitation; as well as other needs. [3]

All children aged 5-16 are legally entitled to a full-time education, suitable to any special education and/or medical need.

Our response to children who are absent from or not in receipt of full-time education ensures that we are proactive in safeguarding children and identify indicators of abuse, as well help to prevent the child missing education in the future.

We hold more than one emergency contact per child and follow up all unexplained absence in a timely manner. Any response to absence (including absence within the school day) will be considered in the context of any need or concern that we are already aware of for the child or their family. This may include the use of home visits.

Any patterns of or prolonged, persistent or severe absence will result in us working with the Cumberland Council attendance and children missing education team and in the case of Looked After Children and previously looked after children; the Virtual School. Such absence will also be considered as a safeguarding concern and recorded as such. In these circumstances, the Designated Safeguarding Lead will work closely with the School Attendance Lead and other relevant Senior Leaders as part of their response.

Further details as to our response to children who are absent from or not in receipt of full-time education; including where this is due to special education and/or medical needs are outlined in the following policies, which are made available to parents (see also Working in Partnership):

- Attendance Policy
- Supporting pupils with medical conditions (see also Safeguarding children with medical conditions)

Children who are Electively Home Educated.

Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best interests at the heart of the decision. However, this is not the case for all, and home education can mean some children are not in receipt of suitable education and less visible to the services that are there to keep them safe and supported in line with their needs.

When a parent/carer expresses an intention to electively home educate their child we will follow local Elective Home Education process and policy and DfE Elective home education guidance.

Where parents need local authority consent to home educate their child and/or elective home education may not be in the child's best interests and/or increase their risk of abuse, neglect, exploitation or harm, this will be treated and recorded as a safeguarding concern.

As a fee paying independent service it is rare that a child would move from us to elective home education. In these circumstances the Designated Safeguarding Lead will work closely with the Headteacher, the SENCO (if the child has special educational needs) and Cumberland Council attendance and children missing education team to review the decision to ensure the parents/carers have considered what is in the best interests of each child.

Children whose behaviour causes concern

It is important that children in our school know and understand how we expect them to behave. This includes teaching them how to behave in a safe and healthy way within, outside and after school; and ensuring that our school is a safe place where all children feel safe and able to learn.

[3] See also Safeguarding children not in school | Child Safeguarding Practice Review Panel

Our Positive Behaviour Policy outlines the expected standards of behaviour for our children; as well as the systems we have in place to create a safe school environment including:

- The Use of reasonable force ,
- Searching, screening and confiscation,
- The use of Mobile phones in schools
- Preventing all forms of bullying and our approach to preventing and responding to child abuse, which is also outlined at Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures
- Referral to hate relating incident reporting processes.).

It further outlines how the school will support and respond to children with additional needs (including those with Special Educational Needs and Disabilities or other Children potentially at greater risk of harm); and children who are suspended.

Behaviour that causes concern can be a sign or indicator that a child has an unmet need or could indicate that they are at risk of or are experiencing/have experienced abuse, neglect, exploitation, harm or some other form of adverse experience[4] in their life. Staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report where a child's behaviour also indicates a safeguarding concern; including being alert to behaviour that causes concern outside of school (including online). This policy and procedures will be followed when there are concerns that a child:

- Is showing early signs of abusive, violent and/or harmful behaviours. These behaviours may be physical, sexual or emotional and could be directed towards children or adults (including staff). It could also include where a child expresses intent to cause serious harm or kill others. Where behaviour is directed towards other children, Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures apply.
- Is regularly/repeatedly receiving sanctions; including being repeatedly removed from the classroom, experiencing multiple suspensions, and/or is at risk of being permanently excluded.
- Is carrying or using a weapon (or expressing intent to do so)
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is at risk of being radicalised into terrorism (see also Preventing Radicalisation)
- Is frequently missing/goes missing from education (including during school time), home or care
- Has signs of self-harm, suicidal ideation/risk of suicide (see also Children requiring Mental Health Support)
- Is misusing alcohol or other drugs

As part of the Designated Safeguarding Lead Response, the Designated Safeguarding Lead will work closely with other relevant Senior Leaders to assess the risk to both the individual pupil and others in the school; to put in place a safety and support plan. If applicable, they will follow:

- Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures and/or
- Keeping Children Safe in Education: Part 1 & Annex A: Serious Violence (including where there are concerns about the child carrying or using a weapon; or expressing intent to do so) and/or
- Local hate related incident reporting processes.

Safeguarding children with medical conditions

We recognise the importance of ensuring early support for children with medical conditions to ensure that their welfare is promoted and they are effectively safeguarded.

[4] See Understanding trauma and adversity | Resources | YoungMinds for further information.

We support children with medical conditions, including allergies and mental health needs through clear school arrangements that promote their health, safety and inclusion. Relevant information is obtained from parents and carers, recorded accurately, shared with appropriate staff on a need-to-know basis, and reviewed when needs change. Staff follow agreed procedures and relevant staff complete appropriate training for:

- managing allergies and dietary requirements
- maintaining first aid arrangements and responding to medical incidents
- administering medicines (where necessary),

Where appropriate and proportionate individual health care plans and children's education is adapted (see also Children who are absent from or are not in receipt of full-time education) to ensure we effectively support children with medical conditions. This may also be in place alongside support provided as part of a child's special education need or disability.

Further details as to our procedures for children with medical conditions are outlined in:

- Supporting pupils with medical conditions that is in line with Supporting pupils with medical conditions at school - GOV.UK, and Cumberland Council's arrangements under section 19 of the Education Act 1996
- Allergy Safety Policy that is in line with Allergy safety in schools - GOV.UK

Where there are concerns that a child's medical needs are not being effectively managed or responded to or indicates risk of suffering abuse, neglect, exploitation and/or harm (whether from parents/carers or other people outside of their family including staff); staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report and (in the case of staff Ensuring safe staff). The Designated Safeguarding Lead Response will work closely with relevant senior leaders to Work in Partnership and in line with the Framework for Action to ensure that the child is effectively safeguarded. Where applicable safeguarding arrangements for Children who attend Alternative Provision will also apply.

Children requiring Mental Health Support

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and/or harm. Children who have mental health needs will often need early help or support to avoid their safety and welfare being compromised.

Our Mental Health Lead is Trevor Marsden, a member of the senior leadership team. We promote mental health and wellbeing through our curriculum and whole-school approach, work with the New Reflexions therapy team, and refer to specialist services where needed, in line with Promoting and supporting mental health and wellbeing in schools and colleges (DfE).

Only appropriately trained professionals should attempt to make a diagnosis of mental health problem. However, we understand that we have an important role to play in:

- promoting good mental wellbeing and preventing the onset of mental illness; including Teaching our children how to keep safe.
- observing children and identifying early those who may be experiencing mental health problems or being at risk of developing one,
- ensuring early targeted support is provided, and
- liaison with/referral to specialist services where needed.

For most children who require mental health support; we will follow our procedures for children with medical conditions. If there are concerns that a child may be experiencing or at risk of developing mental health

problems that place them at risk of harm (for example concerns about self-harm, suicidal ideation or risk of suicide, eating disorders etc); then staff will adhere to Staff Safeguarding Concerns: Recognise, Respond, Report.

As part of the Designated Safeguarding Lead Response, the Designated Safeguarding Lead will work closely with our therapy team and enable children to access support from local mental health support and services. Where there are concerns about self-harm; suicidal ideation of risk of suicide; local pathways and resources will be used.

Children with Special Education Needs Disabilities or other health issues.

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

We recognise and ensure our staff are trained to be aware that additional barriers can exist when recognising abuse, neglect, exploitation and/or harm in this group of children. These can include:

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

Where safeguarding concerns are raised for a child who has SEND, the Designated Safeguarding Lead will work closely with the SENCO. Where applicable safeguarding arrangements for Children who attend Alternative Provision will also be followed.

Young Carers[5]

Where there are concerns that a child is a young carer who may need extra help and support; staff are expected to follow Staff Safeguarding Concerns: Recognise, Respond, Report. As part of the Designated Safeguarding Lead Response; the DSL will consider enabling the child and family to access local support for Young carers.

Children who are Black, Asian, Mixed Heritage or from other minoritised ethnic communities.

Children who are Black, Asian, Mixed heritage or from other minoritised ethnic communities (including Gypsy Roma and Travelling communities) are more likely to experience racism, bias, stereotyping or cultural misunderstanding. We recognise that additional barriers can exist when recognising and responding to abuse, neglect, exploitation and/or harm for children in these groups.[6]

We will act in line with our Safeguarding Statement; as well as being aware of when bias (conscious or unconscious) may affect how we work with children and their families in this group. For example,

[5] For further information, please see: Young carers | Shropshire Council

[6] See Safeguarding children from Black, Asian and minoritised ethnic communities | NSPCC Learning and Black, Asian and Mixed Heritage children | Child Safeguarding Practice Review Panel

- Care should be taken to ensure children in these groups are not treated as older, more mature or resilient than they are (known as adultification).
- Working in partnership to understand how a child's culture and identity shapes what daily life looks and feels like for them.

We will also, where appropriate use, and follow hate relating incident reporting processes.

Children who are lesbian, gay or bisexual

The fact that a child or a young person may be lesbian, gay or bisexual is not in itself an inherent risk factor for harm. However, children in these groups can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning can be just as vulnerable as children who are.

Our School Behaviour Policy and Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures further outlines how we prevent and respond to bullying and other forms of child-on-child abusive behaviour. We will also, where appropriate use, and follow hate relating incident reporting processes.

Children who are questioning their gender

In recent years, there has been an increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society. It is common for children to engage in activities that are less typically associated with their sex. Sometimes young children also go through a period of questioning their gender but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

We will not initiate any action to make changes or put support in place to facilitate a child presenting as the opposite biological sex (known as "social transition") unless a child's parent or carers have been involved in the decision (except when involving them would increase risk to the child).

Keeping Children Safe in Education (part 2), including if a Designated Safeguarding Lead Response is required will be followed relating to:

- Sport
- Regulations and safeguarding requirements relating to school premises
- Boarding and residential accommodation (including educational visits)
- Children who are questioning their gender.

Staff are expected to Report the following to the Designated Safeguarding Lead:

- a child requests changes or support for social transition **and** their parent or carer is not aware of or involved in the decision.
- a child has confided in a staff member, or it is known that they are questioning their gender **but** have not made a request for changes **and** the staff member has concerns for the child's safety or wellbeing (if there are no safeguarding concerns, there is no reason to report to the DSL)
- a parent of carer requests changes or support for social transition **and** there are concerns for the child's safety or wellbeing.

Children who are questioning their gender can sometimes be targeted by other children. In some cases, a child who is perceived by other children or adults to be engaging or behaving in ways that are less typically associated with their sex can be just as vulnerable.

Our School Behaviour Policy and Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures further outlines how we prevent and respond to bullying and other forms of child-on-child abusive behaviour. We will also, where appropriate use, and follow hate relating incident reporting processes.

Equality Act 2010: advice for schools. Please also see New Reflexions Gender Questioning Policy.

So-called 'honour'-based abuse

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast 161 ironing. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers, to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. Information on when and how to make a report can be found at: https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college's designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Child-on-Child Abuse (including harassment and violence)

As set out in our Safeguarding Statement; we will not tolerate the abuse of children. This includes where children abuse other children (child-on-child abuse including harassment and violence) or use words or actions which downplay or could (if not responded to) lead to abuse as this can lead to a culture of unacceptable behaviour and an unsafe environment for children. In worst case scenarios this can create a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

We want to ensure that no child from our school experiences child-on-child abuse (including harassment and violence). However, we understand the scale of child-on-child abuse (including harassment and violence) and that we cannot just rely on children telling us child-on-child abuse is happening. Even if there are no reports in school, this does not mean child-on-child abuse (including harassment and violence) is not happening, but it is just not being reported.

Staff will be made aware of the signs and indicators of child-on-child abuse (including harassment and violence) as part of their Professional Development and Supervision; which do not just rely upon children telling someone.

The school monitors patterns of child-on-child incidents including those involving abuse, to ensure that we are aware of and able to minimise and respond to any emerging themes or patterns of behaviours. This helps us to continue to prevent, identify and respond to child-on-child abuse (including harassment and violence) as outlined at the beginning of this section. This monitoring and our responses to it are reported to and overseen by our Proprietal Body.

Staff Safeguarding Concerns: Recognise, Respond, Report

Recognise

Be alert and curious!

Pay attention to possible **signs or indicators** of abuse from the child or others either from your own observation or what the child/others tell you:

Appearance

Behaviour

Communication.

Do not just rely on a child telling you (there are lots of reasons why they won't)

Any child in any family could become a victim of abuse. Abuse and safeguarding issues are complex; and can often involve a child experiencing multiple issues or types of abuse.

Staff should always maintain the attitude that abuse "could happen here". Staff should be particularly alert to Children potentially at greater risk of harm and vigilant in identifying the signs and indicators which could indicate a concern that a child is being or could be at risk of abuse.

As well as maintaining their Professional development and accessing support; staff can remind themselves of the signs and indicators of abuse and safeguarding issues by referring to: Keeping children safe in education 2026 (comes into force from 1 September 2026) : Part one and Annex A. and the CSCP guidance on reporting a concern about a child.

Signs and indicators of concern may be evident in spaces and places where children spend time (including when online). They may be present in the child or others around them (including adults or children); in their:

- Appearance
- Behaviour
- Communication

Signs and indicators can be recognised by staff through:

Concerns shared directly by a child: Staff *must not rely* on children telling them they are experiencing abuse. Children may not recognise; feel ready; know how to or be able to communicate concerns or worries. Staff must therefore act in accordance with our Safeguarding Statement; work in partnership and use professional curiosity and skills in developing trusted and supportive relationships in their everyday work with children.

Observations: In person or online (including online behaviour in school) of a child or someone else (for example a parent, someone working or visiting the school).

Concerns shared by others: either verbally or in written communications. This could be parents; other children; other staff members or other adults who may be working in or with the school or individual children.

Other systems we have in place: For example online filtering and monitoring or information from other agencies through working in partnership etc.

There will be occasions where there are signs and indicators of concern but not enough evidence to indicate that the child is at risk of or experiencing abuse. Signs and indicators could be present for a variety

of reasons as well as abuse (for example other family circumstances; health or learning needs); and may act as an early sign for the need additional support (in line with the Framework for Action). In such circumstances; staff are still expected to respond in line with this policy.

Respond

Ensure the immediate safety of the child potentially at risk. If there is **immediate danger**; take action as necessary to protect the child, others and yourself (including contacting emergency services on 999 and refer child protection concerns)

Apply other relevant policies/procedures (e.g. behaviour; first aid; attendance, staff code of conduct and/or Appendix B: Child-on-Child Abuse (including harassment and violence) Procedures as applicable).

Seek views/gather relevant information (if safe to do so).

Remember: Listen (don't investigate), reassure (don't promise) and explain you will be reporting the concerns.

Immediate safety

If a child is in **immediate danger**; staff must take individual action as necessary to keep the child, others, and themselves safe. They must:

- Contact emergency services if someone is in immediate danger (999).
- If necessary; refer child protection concerns themselves (follow the Cumberland Single Contact Form via CCASS on 0333 240 1727)
- Work in line with our Behaviour Policy and Restrictive interventions, including use of reasonable force, in schools (DfE, April 2026).
- Report any allegations of harm by adults in a position of trust or unsafe practices in school in line with the Ensuring safe staff.

Other relevant policies/processes

Staff may need to follow other New Reflexions safeguarding policies/processes as applicable along with responding in line with this policy. All staff will immediately consider how best to support and protect the child and any other children who may be at risk or involved; ensuring they act in their best interests. Where there are concerns of child-on-child abuse (including harassment and violence); Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures should be referred to.

Injuries

We request parents notify us of any accidents or injuries to their child before attending school. We will make a written record of the notification along with any injuries the child may have. Should a child receive any injuries during school time; staff will follow our accident reporting and first aid procedures.

We use body maps to record information about physical injuries to a child as part of our accident/behaviour/first aid safeguarding concern *reporting* processes.

Seek views and gather information from the child and others.

Where safeguarding concerns are identified; staff should (where it is safe to do so) always seek the views of and directly from:

- Children (where appropriate and depending on the circumstances and their role with children);
- any other people involved in school (only on a need-to-inform/know basis for the purposes of gathering information for the purposes of safeguarding: see Record Keeping and Information Security)
- Their parents (if necessary and depending on the circumstances and their role).

Any uncertainty about seeking views should be discussed with the Designated Safeguarding Lead.

Seeking views from the child/parents means asking them what they think using open questions (What? How? etc) and if they want any help or support. Staff should listen, reassure, and explain that concerns will be reported. Staff should avoid making assumptions, judgments or investigating. Please also refer to When concerns are directly shared by a child.

Views should always be sought unless it is not safe to do so. This includes where seeking views would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If needs for help and support are identified, staff explain to the child and their parents or carers, where it is safe to do so, that the concern will be passed to the DSL and may be shared with other organisations who can help. Staff do not ask for permission to share. The DSL decides what is shared, with whom and why, and records the decision and the reasons (see The Information Sharing Duty).

Any uncertainty about seeking views should be discussed with the Designated Safeguarding Lead. Decisions to share safeguarding concerns with other organisations without consent will be reported to and overseen by the Designated Safeguarding Lead.

If a child is non-verbal or not able to explain their views themselves due to their age, level of development or needs; then staff should pay attention to how the child may be expressing their views and feelings through their behaviour and use communication tools to help the child share their views.

When concerns are directly shared by a child

Children are more likely to share their experiences and feelings with someone they know and feel comfortable talking to.

When children share the details of or feelings about abuse; the process of sharing can sometimes take time. Children may not share in full or give staff (and sometimes not the same staff member) pieces of information over time. When they do share, this may not always be verbally or directly; but the child may share in the Appearance, Behaviour or other forms of communication (see Recognise section).

It takes a lot of courage for a child to share that they feel unsafe or are experiencing abuse. There are many reasons why children do not share their experiences (for example, uncertainty, shame, experiences of discrimination, fear, denial or a lack of understanding or ability to recognise and explain their experience).

When children are sharing their concerns; staff should:

- **Listen to the child.** Please refer to this NSPCC poster.
- **Remain calm:** the child may stop sharing if they feel the staff member is upset or shocked by what the child is telling them.
- **Explain it can't be a secret.** Staff must explain to the child that what they share has to be passed on and to who so that you can help them. Think about when to do this to make sure the child feels safe and can continue to trust you and other staff.
- **Reassure** and offer comfort to the child (physical touch should not be automatically offered as comfort); recognise their feelings and their courage in sharing their experience. Never deny or minimise what the child is telling you or reprimand them if they decide not to share or for not telling you before.
- **Seek the child's views:** use questions or communication tools that help the child to share from their own point of view. Gather information: do not investigate or assume what is happening to the child.
- **Explain** what will happen next. If you don't know everything that is going to be done, tell the child that you will make sure that they are kept informed.

- **Report and record** the conversation immediately as outlined in the Reporting concerns section.
- **Seek support** if you feel distressed from your line manager, the DSL, a colleague or Health assured.

Report

Report in person to the Designated Safeguarding Lead as soon as possible.

Record your concerns, decisions, actions and outcomes on the safeguarding recording system.

If concerned about a member of staff or someone else in the school; report in line with Ensuring safe staff.

Report to Designated Safeguarding Lead

All safeguarding concerns must be Reported to the Designated Safeguarding Lead as soon as they are recognised and after the initial response to the child and others. Staff are expected to verbally report their concerns to the Designated Safeguarding Lead.

Where concerns involve an allegation of harm or a low-level concern about someone working in or at the school; staff must follow Ensuring safe staff.

Record concerns

All safeguarding concerns must be recorded by the staff member in writing on the Child protection report or log on CPOMs. Where physical injuries to a child form part of the evidence of the concern; staff will record information about the physical injuries observed on a Body Map also on CPOMs.

Each safeguarding concern record should include:

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

If staff are unsure of the recording requirements staff should seek advice from the Designated Safeguarding Lead.

Designated Safeguarding Lead Response

Safeguarding concerns can be raised by staff as above; but may also be raised to the Designated Safeguarding Lead by:

- Children, parents, or visitors to the school.
- Other agencies (see Working in Partnership)
- The school's ICT filtering and monitoring systems.
- The Designated Safeguarding Lead will:

Consider and assess the concern.

Review the information reported; gather any further information as necessary; including conducting a risk and needs assessment if necessary. The Designated Safeguarding Lead will use and refer to the following:

- Working Together to Safeguard Children (particularly Chapters 1 and 3)
- Keeping children safe in education
- Cumberland Multi-Agency Thresholds Guidance
- Other relevant local tools and pathways (CSCP procedures)
- If applicable Understanding and identifying radicalisation risk in your education setting

- When to call the Police - information for schools

Decide on what action to take.

Once the concern has been considered and assessed; the Designated Safeguarding Lead will decide on action(s) to be taken. They may wish to delegate actions to other members of staff; in the best interests of the child. The DSL will assist the Headteacher with decisions to Ensuring safe staff in school.

In making decisions; the Designated Safeguarding Lead will work in partnership with the Directors, Headteacher; relevant staff/senior leadership team in line with their Roles and Responsibilities and any other organisations as appropriate (see Working in Partnership and Record Keeping and Information Security).

Actions could include one or more of the below:

- **Manage internally/provide every day advice and support** in alignment with school policies and processes and the Cumberland Multi-Agency Thresholds Guidance offering support to the child and their family through school pastoral support in a way which addresses the needs/risks identified. This may also include actions to make locations/school infrastructure (including online) safer; adapt our curriculum to ensure we are Teaching our children how to keep safe.; or Working in Partnership.
- **Offer Extra Help/Community Based Early Help** in line with local Framework for Action and/or use of/referral to local education inclusion arrangements; we will consider offering other support or intervention beyond internal management. This could include offering and/or referring a child and/or their family for enhanced or specialist support services to address the needs/risks identified. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Offer and refer to Family Help:** in line with local Framework for Action and/or use of/referral to local education inclusion arrangements. Where is identified that a child and their family would benefit from a co-ordinated, multi-agency response and there are clear needs/risks we will offer and refer to Family Help. This could include offering and/or referring a child and/or their family for enhanced or specialist support services to address the needs/risks identified. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Raise Child Protection Concerns** in line with local Framework for Action and (if applicable) reporting requirements set out Keeping children safe in education.
- **Report to the Police.** If there are any concerns that a crime (including online) may have been committed by someone against or involving a child; concerns will be reported to the Police. The law may also require us to report concerns that crimes have been committed by others where children have not been directly involved (for example in the interests of community safety). We will follow our Sharing safeguarding information with others procedures, including using: Sharing personal data with law enforcement authorities | ICO
  Where there is possible criminal behaviour by a child (including in circumstances of child-on-child abuse); we will take account of When to call the police: guidance for schools and colleges.

  Other local referral processes will also be followed as applicable: including referring to relevant multi-agency forums and processes as outlined in relevant local tools and pathways (e.g. to Prevent Radicalisation; ensure Online Safety; respond to Domestic abuse.

- **Report Hate-related behaviour to the Local Authority.** We will follow hate relating incident reporting processes where any behaviour is perceived by the reporting person or any other person that the incident was motivated by hostility or prejudice (or perceived hostility or prejudice) based on another person's:
  - Sex
  - Race

- Religion
- Sexual orientation
- Disability
- Transgender identity

In these circumstances we will report to Cumbria Police and may request support from Victim Support (Cumbria).

Record actions, decisions, and outcomes.

On the child protection record and in line with Record Keeping and Information Security . This will include assessments and discussions (including meeting notes/minutes) of discussions and meetings with staff or others (see Working in Partnership). The Designated Safeguarding Lead will keep detailed, accurate, written records of all concerns, discussions and decisions made including their rationale for those decisions. This should include instances where referrals were or were not made to another agency.

Manage and oversee any ongoing response.

Once the initial actions are taken; the Designated Safeguarding Lead will decide whether there is an ongoing need to actively monitor or manage the safeguarding needs of a child. Where this is decided; they will ensure that the school works in partnership with the child; parents, and any other involved agencies. This may include taking further actions (as outlined above) where concerns escalate.

The CSCP Escalation Policy will be used to challenge, resolve and if necessary escalate any concerns the school may have when working with other agencies in safeguarding children.

County Lines

'County Lines' is a national issue involving the use of mobile phone 'lines' by groups to extend their drug dealing business into new locations outside of their home areas. This issue affects the majority of forces. A 'county lines' enterprise almost always involves exploitation of vulnerable persons; this can involve both children and adults who require safeguarding. The assessment has identified the need for a multi-agency approach at a national, regional and local level. Secure operating bases and Mobile phone 'lines' are an essential feature of these enterprises.

A typical county lines scenario is defined by the following components:

a.) A group (not necessarily affiliated as a gang) establishes a network between an urban hub and county location, into which drugs (primarily heroin and crack cocaine) are supplied.

b.) A branded mobile phone line is established in the market, to which orders are placed by introduced customers. The line will commonly (but not exclusively) be controlled by a third party, remote from the market.

c.) The group exploits young or vulnerable persons, to achieve the storage and/or supply of drugs, movement of cash proceeds and to secure the use of dwellings (commonly referred to as cuckooing).

d.) The group or individuals exploited by them regularly travel between the urban hub and the county market, to replenish stock and deliver cash.

e.) The group is inclined to use intimidation, violence and weapons, including knives, corrosives and firearms to intimidate and control members of the group and associated victims.

Our students may be at risk of involvement due to their vulnerabilities and any previous links with urban areas.

Child Sexual Exploitation (CSE)

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

The definition of child sexual exploitation is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Like all forms of child sexual abuse, child sexual exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex
- Can still be abuse even if the sexual activity appears consensual
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity
- Can take place in person or via technology, or a combination of both
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- May occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example)
- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- Is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Child sexual exploitation is a complex form of abuse and it can be difficult for those working with children to identify and assess. The indicators for child sexual exploitation can sometimes be mistaken for 'normal adolescent behaviours'. It requires knowledge, skills, professional curiosity and an assessment which analyses the risk factors and personal circumstances of individual children to ensure that the signs and symptoms are interpreted correctly and appropriate support is given. Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don't comply (all of which are common features in cases of child sexual exploitation) consent cannot legally be given whatever the age of the child.

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm. One of the key factors found in most cases of child sexual exploitation is the presence of some form of exchange (sexual activity in return for something); for the victim and/or perpetrator or facilitator.

Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or alcohol) and intangible rewards (such as status, protection or perceived receipt of love or affection). It is critical to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a child/young person does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil

the requirement for exchange, for example a child who engages in sexual activity to stop someone carrying out a threat to harm his/her family.

Whilst there can be gifts or treats involved in other forms of sexual abuse (e.g. a father who sexually abuses but also buys the child toys) it is most likely referred to as child sexual exploitation if the 'exchange', as the core dynamic at play, results in financial gain for or enhanced status of the perpetrator.

Where the gain is only for the perpetrator/facilitator, there is most likely a financial gain (money, discharge of a debt or free/discounted goods or services) or increased status as a result of the abuse.

If sexual gratification, or exercise of power and control, is the only gain for the perpetrator (and there is no gain for the child/young person) this would not normally constitute child sexual exploitation, but should be responded to as a different form of child sexual abuse.

Child sexual exploitation can occur in all communities and amongst all social groups and can affect girls and boys. All practitioners should work on the basis that it is happening in their area.

Child sexual exploitation is occurring across the country but is often hidden so prevalence data is hard to ascertain. All practitioners should be open to the possibility that the children they work with might be affected.

Students aged 12-15 years of age are most at risk of child sexual exploitation although victims as young as 8 have been identified, particularly in relation to online concerns. Equally, those aged 16 or above can also experience child sexual exploitation, and it is important that such abuse is not overlooked due to assumed capacity to consent. Account should be taken of heightened risks amongst this age group, particularly those without adequate economic or systemic support.

Though child sexual exploitation may be most frequently observed amongst young females, boys are also at risk. Practitioners should be alert to the fact that boys may be less likely than females to disclose experiences of child sexual exploitation and less likely to have these identified by others.

Child sexual exploitation affects all ethnic groups.

"Working Together" makes clear the requirements for holistic assessment. Sexual exploitation is often linked to other issues in the life of a child or young person, or in the wider community context. Practitioners should be alert to the fact that child sexual exploitation is complex and rarely presents in isolation of other needs and risks of harm (although this may not always be the case, particularly in relation to online abuse). Child sexual exploitation may be linked to other crimes and practitioners should be mindful that a child who may present as being involved in criminal activity is actually being exploited.

Practitioners should not rely on 'checklists' alone but should make a holistic assessment of vulnerability, examining risk and protective factors as set out in the statutory guidance Working Together.

Sexual exploitation can have links to other types of crime. These include:

- Child trafficking;
- Domestic abuse;
- Sexual violence in intimate relationships
- Grooming (including online grooming)
- Abusive images of children and their distribution
- Drugs-related offences
- Gang-related activity
- Immigration-related offences
- Domestic servitude.

The following vulnerabilities are examples of the types of things children can experience that might make them more susceptible to child sexual exploitation:

• Having a prior experience of neglect, physical and/or sexual abuse;

• Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);

• Recent bereavement or loss;

• Social isolation or social difficulties;

• Absence of a safe environment to explore sexuality;

• Economic vulnerability;

• Homelessness or insecure accommodation status;

• Connections with other children and young people who are being sexually exploited;

• Family members or other connections involved in adult sex work;

• Having a physical or learning disability;

• Being in care (particularly those in residential care and those with interrupted care histories); and

• Sexual identity.

Not all children and young people with these vulnerabilities will experience child sexual exploitation. Child sexual exploitation can also occur without any of these vulnerabilities being present.

Potential indicators of child sexual exploitation.

Children rarely self-report child sexual exploitation so it is important that practitioners are aware of potential indicators of risk, including:

- Acquisition of money, clothes, mobile phones etc. without plausible explanation
- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicions of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being.

Practitioners should also remain open to the fact that child sexual exploitation can occur without any of these risk indicators being obviously present. Practitioners should also be alert to the fact that some risk assessments have been constructed around indicators of face-to-face perpetration by adults and may not adequately capture online or peer perpetrated forms of harm. It is also important to remember that risk assessments only capture risk at the point of assessment and that levels of risk vary over time, and that the presence of these indicators may be explained by other forms of vulnerability rather than child sexual exploitation.

Recent national reviews have also demonstrated the challenges in engaging victims of CSE. Many may feel too ashamed at what has happened to them to come forward but may also be unable or unwilling to see themselves as victims in the first instance.

Young people have suggested that the following should be at the heart of all planning and decision making about CSE:

- Don’t make assumption about who I am and what I need

- Help make me safe and stop it happening
- It's not just me
- Punish the right people
- Don't think there is a quick fix

Managers should be aware of the local protocols and CSE strategies and discuss concerns prior to or on admission for the young people who are accommodated within their homes.

Child Criminal Exploitation (CCE)

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

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap or coerce them into debt. They can be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm. As children involved in criminal exploitation often commit crimes themselves (particularly older children), they are not always recognised and treated as victims despite the harm they have experienced. They may still have been criminally exploited even if it appears they agreed or consented to the activity.

It is important to note that the experience of girls who are criminally exploited may be different to that of boys. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Last Reviewed	September 2026
Next Review	September 2027
Reviewed by	Executive Head Teacher and Proprietors

Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures

Addressing child-on-child abuse: a resource for schools and colleges (farrer.co.uk)

We aim to prevent, identify, and respond to child-on-child abuse at the earliest opportunity by:

- Expecting all staff and Proprietors across our schools to ensure they are adhering to and promoting the commitments we make in our Safeguarding Statement.
- Ensuring staff are aware of and respond to signs and indicators of child-on-child abuse. This includes ensuring that our Designated Safeguarding Lead and other relevant staff have completed training in how to assess and respond to child-on-child abuse. For further detail; please refer to Professional Development and Support.
- Being clear how we expect our children to behave towards one another. Our Behaviour Policy outlines these expectations; how the school will support our children to understand and fulfil them; and how we will prevent and respond to behaviour which falls below our expected standards (including all forms of bullying see our Preventing Bullying Policy). Where behaviour also indicates child-on-child abuse; staff will adhere to the processes outlined in this section.
- Ensuring we are Teaching our children how to keep safe..
- Making sure that children who experience or are at risk of experiencing abuse from other children are identified, feel supported and safeguarded from further harm.
- Making sure that children who have caused or are identified as being at risk of being abusive in their behaviour towards other children are identified, supported and safeguarded from engaging in further harmful behaviour.
- Making sure that we are taking positive action to ensure that Children who are more vulnerable to child-on-child abuse are not disproportionately impacted by child-on-child abuse in our schools.
- Ensuring appropriate supervision at a higher level than in mainstream environments to support and manage our young people, who have often developed behaviours from past trauma which they need help to reflect on and adjust.
- Information about a child who may pose a risk to other children is shared with relevant organisations under the Information Sharing Duty, without consent, even where that child is not at risk themselves. We share it to safeguard every child involved, including the child who may pose the risk

What is child-on-child abuse (including harassment and violence)?

Child-on-child abuse:

- Is when a child or group of children inflicts harm or fails to act to prevent harm to another child.
- Actions that cause harm can be a single serious incident or a pattern of incidents.
- Harm caused to a child can be physical, emotional and/or psychological; and can include witnessing the ill treatment of others.
- Can happen both inside and outside of school; at home or someone else's home; in public spaces and online. In the school context; we know that child-on-child abuse can take place in spaces and at times of the school day where children are less likely to be supervised. We also know that where child-on-child abuse is taking place outside of school (including online) this abuse can also continue and have an impact on a child when they are at school.
- Can be defined in different ways (examples are outlined in Keeping Children Safe in Education 2026: Part 1; Child-on-child abuse and Part 5).
- A child may experience one or multiple types of child-on-child abuse at the same time.

Serious violence including: physical assault and harm, threats to cause serious harm or kill or the threat of harm with a weapon

Serious violence is a continuing safeguarding concern. It may involve:

- physical assault,
- carrying, threatening with, or using weapons,

- threats to cause serious harm or kill

Serious violence can often take place in the context of child-on-child conflict or bullying, and it can also be associated with criminal exploitation.

Staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report where a child's behaviour towards other children causes safeguarding concern; including being alert to behaviour that causes concern outside of school (including online). This includes any concerns about a child carrying or using a weapon (or expressing intent to do so) towards another child.

The Designated Safeguarding Lead will follow Our response to child-on-child abuse (including harassment and violence) including carrying out a Risk and needs assessment.

Harmful sexual behaviour, sexual harassment and sexual violence

We follow Keeping Children Safe in Education Part 5: child-on-child sexual harassment and sexual violence to recognise and respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. As outlined in Professional development and support, everyone who works for the school is expected to read and follow Part 5. Designated Safeguarding Leads will carry out Brook Traffic Light Training to help them to respond to child-on-child abuse (including harassment and violence).

In ensuring that staff are not downplaying and can recognise harmful sexual behaviour, sexual harassment and sexual violence, it is important that they understand the applicable laws and are careful about making professional judgments about Sexual development and behaviour in children . This includes understanding what consent is and the age of consent; as well as the age of criminal responsibility (all of which is outlined in Keeping Children Safe in Education Part 5).

We are aware that and will adhere to the mandatory duty to report child sexual abuse[7], following the publication of statutory guidance which is expected to come into force this academic year.

Staff should not make decisions about children's sexual behaviour on their own. Staff are expected to seek the support, advice and expertise of the Designated Safeguarding Lead on this subject.

Where there are concerns indicating child-on-child harmful sexual behaviour, sexual harassment and/or sexual violence (as outlined in Keeping Children Safe in Education Part 5). Staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report This includes behaviours, potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Any misogynistic or misandrist behaviours should also be reported.

Consensual and non-consensual making or sharing of nudes and semi nudes

Taking and sharing nude or semi-nude explicit images, including those generated using AI of those aged under 18 is a criminal offence.[8]

Where staff become aware that a child:

- has or may have shared a nude or semi-nude images, including those generated using AI either of themselves or another child; or
- has or may have had such images, including those generated using AI of themselves shared by another child or children;

they are expected to follow Sharing nudes and semi-nudes: how to respond to an incident and adhere to Staff Safeguarding Concerns: Recognise, Respond, Report. This expectation applies even if the child indicates that they have consented to the images being shared (please also see Harmful sexual behaviour, sexual harassment and sexual violence). Staff should immediately report their concerns to the Designated

[7] Further information available at: Mandatory reporting of child sexual abuse in England: update on the Crime and Policing Act | NSPCC Learning

[8] See legislation and guidance at: Safeguarding, sexting and sharing nudes | NSPCC Learning

Safeguarding Lead if there is any indication of adult involvement (including concerns that an adult may be pretending to be a child).

The Designated Safeguarding Lead Response to reports of consensual and non-consensual making or sharing of nude or semi-nude images, including those generated using AI will include reference to:

- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- AI Generated Child Sexual Abuse Material Guides for Professionals | Internet Watch Foundation & National Crime Agency

Children who are more vulnerable to child-on-child abuse (including harassment and violence)

Please read this alongside Children potentially at greater risk of harm.

Children who are perceived to be different to others can be particularly vulnerable to child-on-child abuse. When children are abused by other children; there is more often than not a misuse of power or privilege by the child(ren) causing harm. This can have a significant impact on the emotional development and mental wellbeing of the child who is being harmed; and lead them to feel isolated, unsafe, and traumatised.

Children who harm others may have additional or complex needs. Harmful behaviour by children can also be a sign or indicator that a child has an unmet need or could indicate that they themselves are at risk of or are experiencing/have experienced abuse or neglect or some other form of adverse experience[9] in their life. Children who harm other children may have power or privilege over a child(ren) they are causing harm to but can also be powerless or vulnerable in other part of their lives.

Child-on-child abuse is harmful to all children involved.

Evidence[10] indicates that children from particular groups are more vulnerable to child-on-child abuse. This includes children who:

- Have special education needs and/or disabilities and/or health issues.
- Have already been and/or are experiencing abuse or some other kind of adversity or trauma. This includes children who are looked after or who have a social worker due to safeguarding concerns.
- Are eligible for free school meals. Socio economic inequality can increase incidents of bullying.
- Are from Black, Asian mixed heritage and/or other minoritized ethnic communities (including travelling communities and children for whom English is an additional Language). These children are more likely to be the target of hate-related behaviour/crime. They are less likely to be identified as children who are being harmed and more likely to be over identified as children who are a risk of causing harm. This is known as adultification bias[11].
- Are Lesbian Gay, Bi-Sexual; Gender Questioning. These children are more likely to be the target of bullying and/or hate-related behaviour/crime and harmful sexual behaviour and abuse.
- Are female. Girls are generally more vulnerable experiencing child-on-child abuse (including harassment and violence) and to Harmful sexual behaviour, sexual harassment and sexual violence and abuse in intimate personal relationships. They can however also abuse (including harass and behave violently towards) other children.
  Are male. Boys and are more vulnerable to experiencing bullying; particularly that which is physical in nature (including being forced to carry out initiation or other acts which humiliate or degrade: known as hazing).

Boys are more likely to be involved in serious violence including towards other children; particularly if:

- they have already experienced child maltreatment;
- previously been a victim of or perpetrated serious violence;
- are Children whose behaviour causes concern, and/or attend (or have attended) Alternative Provision.

- Older boys are also more vulnerable to displaying harmful sexual behaviour; particularly if they have already experienced trauma and family difficulties

Where a child has several differences and would fall into multiple groups above; this further increases their vulnerability.

When is child-on-child behaviour considered abusive?

We recognise the importance of distinguishing between behaviour that is developmentally appropriate, problematic, or harmful. Harmful behaviour is abusive. It can also (but not always) include physical abuse.

In considering whether behaviour is abusive; staff should consider:

- **The impact on the child(ren) affected by the behaviour:** Any behaviour that is likely to have an impact on a child's physical and emotional health and development should be considered potentially harmful. The greater the impact of the behaviour on the child's health and development; the greater level of harm caused to them.

  The needs and circumstances of the child who is identified as being potentially harmed should always be considered. This should also include ensuring that their wishes and feelings are sought and recognised in considering the impact upon them.
  Even where children do not/are not able to express their wishes and feelings; staff should also pay attention to other potential signs/indicators of abuse (please refer further to Staff Safeguarding Concerns: Recognise, Respond, Report)

  Children raising child-on-child concerns either for themselves or others will be taken seriously and never be given an impression they are creating a problem.

- **The behaviour of the child(ren) who is/are causing harm:** It is important to consider the behaviour of children on a continuum; taking account of their age and level of development; as well as any other needs or circumstances that may influence their behaviour (for example a child who is causing harm to other children could be an indication that they have unmet needs; or may be a sign or indicator that they are experiencing abuse, or are experiencing some other adverse experience which is having an impact upon them).

  Features of abusive behaviour[12] can include:

  - A pattern of similar behaviour (this can include lower-level problematic behaviours that have occurred over time that have begun to increase in frequency or seriousness)
  - A misuse of power over the child who is being harmed. (please also see children who are more vulnerable above).
  - Victimisation of the child who is being harmed. This could also include circumstances where the child causing harm is supported or joined by other children.
  - Intrusive behaviour; not considering or enabling the child being harmed to freely agree and/or consent to the behaviour.
  - An element of control; coercion and/or force.
  - Physical/sexual violence including threats to cause serious harm or kill, or the threat of harm with a weapon (this does not always have to be present; but where it is so would heighten the level of concern).

- Evidence that a child is actively seeking, planning or getting enjoyment or pleasure from causing harm would also heighten concern.

Our response to child-on-child abuse (including harassment and violence)

In most instances, we will use our Positive Behaviour Policy to manage the conduct of children towards each other. However, where behaviour is considered abusive or indicates safeguarding concerns; then staff will also need to raise such concerns to the Designated Safeguarding Lead in line with the Staff Safeguarding Concerns: Recognise, Respond, Report section.

In responding to any concern of child-on-child abuse; we will take account of:

- Keeping children safe in education: Part 5 (Harmful sexual behaviour, sexual harassment and sexual violence), Part 1 and Annex A & B (Serious violence).
- Use of reasonable force in schools
- Searching, screening and confiscation at school
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- When to call the police: guidance for schools and colleges.
- Local hate relating incident reporting processes (when applicable)
- Brook Traffic Light Tool (when applicable)

Risk and needs assessment.
All staff will immediately consider how best to support and protect **all children involved** in child-on-child abuse incidents; ensuring they act in their best interests.

We may deem it necessary to complete a formally recorded risk and needs assessment for all children involved in child-on-child abuse incidents. The decision to complete a formal risk assessment will be taken by the Designated Safeguarding Lead. This formal assessment will always take place where there is evidence of violent or abusive behaviour.

- Serious violence including: physical assault and harm, threats to cause serious harm or kill or the threat of harm with a weapon
- Sexual Violence (as outlined in Keeping Children Safe in Education Part 5)
- Any other child-on-child behaviour (including harassment and violence) that is considered abusive

The risk and needs assessment will clearly identify and outline the strategies to be put in place to address risks and needs and so safeguard:

- **All children involved including:**
  - The safety and support needs of/risks to child(ren) directly affected by the behaviour
  - The safety and support needs of/risks to and from child(ren) who is/are allegedly causing harm
  - child(ren) attending the school who have been indirectly affected by or involved in the behaviour or may be at risk of further behaviour
  - other child(ren) who may not be at the school who may have been affected by or involved in the behaviour or may be at risk of further behaviour (for example siblings or children who attend other education provisions)
- **Any adults who may be at risk.** This might include staff or parents/carers who may be at risk of child to parent/carer abuse from the child who is causing harm. (please refer to local Multi-Agency Policy: Child to Parent Abuse (CPA))
- **The School,** including considering the wider school community and any steps that may be needed to improve the safety of the school. For example, considering the location and time where harm has allegedly taken place, and considering what steps need to be taken to improve safety.

The risk and needs assessment will be completed using relevant evidence-based assessment tools as applicable; taking account of information from all key staff (and relevant involved professionals) working

with the children, as well as their parents/carers. It will also include the views and feelings of the children; where this is safe and appropriate to do so.

The risk assessment will be shared will all staff and relevant involved professionals who work with the children; as well as parents and carers. It will respond to any changes in behaviour and will be regularly updated and evaluated to assess impact.

We use a template risk and needs assessment.

Response

The parents/carers **children who attend the school and are directly involved** will be notified of and involved in our response. We will only share the details of other children to parents/carers who do not have parental responsibility for them where we have consent to do so or where a decision has been taken to share to enable them to effectively safeguard their child (please also refer to Record Keeping and Information Security)

The risk and needs assessment will inform the response taken. The following responses will be considered; (more than one response can be considered):

- **Manage internally** in alignment with our Positive Behaviour Policy and pastoral support offer in a way which addresses the needs/risks identified. Any sanctions imposed on the child causing harm will be proportionately balanced with any other responses (such as police involvement) and take accounts of risks and needs; as well as the ongoing impact on/risk to the child who has been harmed or others. This may also include actions to make locations/school infrastructure (including online) safer; adapt our curriculum to ensure we are Teaching our children how to keep safe.; or Working in Partnership.
- **Offer Extra Help/Community Based Early Help** in line with local Framework for Action and/or use of/referral to local education inclusion arrangements; we will consider offering other support or intervention beyond internal management. This could include offering and/or referring **any child involved (directly or indirectly) who attends the school** to enhanced or specialist support services to address the needs/risks identified.
- **Offer and refer to Family Help:** in line with the local Framework for Action and/or use of/referral to local education inclusion arrangements. Where is identified that **any child involved (directly or indirectly)** who attends the school would benefit from a co-ordinated, multi-agency response and there are clear needs/risks we will offer and refer to Family Help. This could include offering and/or referring **any child involved (directly or indirectly) who attends the school** to enhanced or specialist support services to address the needs/risks identified. We will seek the family's agreement to take part in voluntary support and take account of children's wishes and feelings. Agreement is not needed for us to share relevant information with these services under the Information Sharing Duty.
- **Raise Child Protection Concerns** in line with local Framework for Action and (if applicable) Part 5 Keeping children safe in education.
- **Report to the Police.** We will take account of When to call the police: guidance for schools and colleges and (if applicable) Part 5 Keeping children safe in education and/or Sharing nudes and semi-nudes: advice for education settings working with children and young people
- **Report Hate-related behaviour to the Local Authority.** We will follow hate relating incident reporting processes where any child-on-child behaviour is perceived by the reporting person or any other person that the incident was motivated by hostility or prejudice (or perceived hostility or prejudice) based on another person's:
    - Sex
    - Race
    - Religion
    - Sexual orientation
    - Disability

- Transgender identity

In these circumstances we will report to Cumbria Police and may request support from Victim Support (Cumbria).

Recording and monitoring

All child-on- child abuse concerns and responses will be recorded and stored on the child protection records of all involved children (Please refer to Record Keeping and Information Security). Child-on-child incidents that do not indicate abuse or raise safeguarding concerns are recorded in line with our Behaviour Policy on CPoms.

Appendix B: Safeguarding Concern Reporting Format

Cause for concerns are logged on the Arbor System under each students records.

Appendix C: Harmful Sexual Behaviour Risk Assessment

When completing a risk assessment, advice in statutory and non-statutory guidance should be considered. Whilst not intended to be an exhaustive list, can include:

Department for Education: Keeping children safe in education: This statutory guidance sets out the legal duties you must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges. In the context of harmful sexual behaviour, the most relevant section of this is section 5.

Department for Education: Sharing Nudes and Semi-Nudes: Advice for Education Settings working with Young People: This non-statutory advice aims to support designated safeguarding leads (or equivalents) and senior leadership teams in education settings in England in responding effectively to incidents involving the sharing of nudes and semi-nudes.

Department for Education: Working together to safeguard children: Working together to safeguard children (usually referred to as just Working Together) is statutory guidance produced by the government which outlines how practitioners working with children, young people and families should work together in order to ensure that children and young people remain safe from harm. It should also be produced in line with, and link to the following school/academy policies:

- Child protection and safeguarding policy
- Whistleblowing policy
- Behaviour policy
- Anti-bullying policy
- Online safety policy
- Acceptable Use Agreements
- Curriculum Policies
- Use of outside agencies

The risk assessment is split into two sections. First is a summary to capture details about the child and any other surrounding safeguarding issues. The second section is the full risk assessment to detail the incident(s) that have led to the need for this risk assessment to be carried out, provide evidence and log any further concerns:

Appendix D: Harmful sexualised behaviour assessment tool

Summary

Name of child/young person	
D.O.B.	
Any outside agency involvement	
Safeguarding concerns/context including previous behaviours/ incidents recorded and subsequent measures taken.	
SEND status	
Date of SEND Diagnosis	
Additional relevant background information *including known vulnerabilities, previous behaviours/ incidents recorded, and subsequent measures taken*	
Names and details of current professionals involved	
Date of initial risk assessment	
Review dates	

Full Risk Assessment

Details of the incident/behaviours that have led to this risk assessment

Describe the types of behaviour or language observed (linked to KCSIE, policy definitions)

- Where did it happen?
- When did it happen (date and time) – is this an isolated incident or have there been multiple occurrences?
- Is anyone else involved – who and ages?
- Is there an imbalance of power?
- What was the learner's response?

What was the response of parents/carers when behaviour was reported to them?

Other behavioural concerns, if any

E.g. Use of violence/coercion/ distracted or out of character behaviour, incidents and school and out of school, friendship/relationship concerns, disruptive behaviour, emotional wellbeing etc.

What are the specific harmful sexual behaviour concerns?

(including online)

Use the definitions from KCSIE to identify the behaviours

Evidence

Impact on others - Who might be affected or harmed?

Are there specific concerns about age groups, gender, vulnerable children?

Evidence

Identified or known potential triggers or additional risk, including online *E.g. particular lessons, locations, activity using technology, activities, times of day, peers, staff, activity outside of school, transport home etc.*	**Strategies to mitigate risk** *E.g. Additional supervision or support, seating arrangements, specific adults that a young persons can contact, managed timetable, transport arrangements etc.*

Add extra rows if required

Child's strengths, interests, positive characteristics

Any current work being undertaken to support the child e.g. outside agency intervention, in-school support, and how the child is responding to these measures etc.

Any external agency referrals or contact made with other support agencies and support received (and how the child is responding)

Include name of agency and contact details, support being sought and who made the referral/contact and any views that they have on the child in question

Review

How will you assess whether the level of risk has changed (decreased or increased)? What does the child need to work towards achieving/avoiding?

E.g. Change in the child's attitudes about their behaviour, change in child or young person's approach to others, change in number and type of behavioural incidents of HSB etc.

Date of next planned review

.....

Names of those with whom the assessment is shared

Agreed By

Name	Role	Signature and date
	Headteacher	
	Designated Safeguarding Lead	
	Child or young person	
	Parents/Carers	
	Other Agencies	

harmful-sexual-behaviour-service-risk-assessment.pdf (swgfl.org.uk)

Appendix E : Alternative Provision Quality Assurance Checklist

Alternative Provider Checked	
Date	
Persons checking	

Spot checks on DBS certificates	
All vetting checks undertaken	
Public Liability Insurance Documentation	
Spot checks on staff qualification certificates, where required	
Arrangements for ensuring a qualified first aider is always available	
Alternative provider data sharing policy	
Risk assessments for activities being carried out	
Child protection procedures and training	
Fire certificates and arrangements	
Procedures for identifying and signing in visitors	
Induction process for new students	
Quality of activities/teaching and learning	
Online safety, filtering and monitoring	
Privacy statement for sharing with young people	
Lone working policy	
Knowledge of inclusive practice	
Systems for recording and reporting student progress	
Infectious diseases awareness	
Daily attendance monitoring arrangements	

Appendix E: Local information sharing arrangements

Our local safeguarding partnership is the Cumberland Safeguarding Children Partnership (CSCP). Concerns that need a referral, and information that may help children's social care assess need or risk, go to the Cumberland Children Advice and Support Service (CCASS) on 0333 240 1727 using the Cumberland Single Contact Form (Emergency Duty Team 0300 373 2724 out of hours). In an emergency, call 999.

The partnership's information sharing procedures are at cumberlandscp.trixonline.co.uk. Where these differ from the Information Sharing Duty, the statutory duty takes priority. We will update this appendix when the partnership publishes its revised arrangements and data sharing agreement for the duty.

For a child who lives in another local authority, we share with that authority's front door and follow its arrangements.