Safeguarding Policy
2026-2027

Document control

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Review by:	L. Morris		
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1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026, in force from 1 September 2026) and Working Together to Safeguard Children (2023), the Maintained schools governance guide and Academy trust governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

The policy has been updated to reflect the KCSIE 2026 summary of changes, including the removal of the condensed Part one annex, strengthened expectations for all staff to read Part one, expanded information sharing guidance, updates to online safety and generative AI, revised safer recruitment/regulated activity guidance, and updated sections on children who may be at greater risk of harm.

References to data protection in this policy should be read as references to the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 where applicable.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to have completed safer recruitment training.
- Part 3 of the Schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take

positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets the requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

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3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Making or sharing nudes and semi-nudes (also known as sexting or nudes and semi-nudes) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are AI-generated or digitally altered images that otherwise appear to be a photograph or video. **Children** includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Have medical conditions or physical health needs which may create additional barriers to recognising, disclosing or responding to abuse or neglect
- Are young carers
- May be affected by child-on-parent/carer abuse, family complexity or caring responsibilities which increase the need for early identification and support
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality - We recognise that racism, faith-targeted abuse and other prejudice-based behaviour can have a significant impact on a child's welfare, wellbeing, mental health, attendance and sense of belonging. Where such concerns affect a child's safety or welfare, they will be considered and responded to through our safeguarding processes.
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation • Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.

We are committed to promoting an inclusive, respectful and anti-discriminatory culture. Staff will actively challenge prejudice-based behaviour, including racism, faith-targeted abuse and discriminatory language, recognising that such behaviour may be linked to wider safeguarding concerns.

This will be underpinned by our:

- Behaviour policy

- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as: ○ Healthy and respectful relationships ○ Boundaries and consent ○ Stereotyping, prejudice and equality ○ Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:
Read Part one of Keeping Children Safe in Education 2026. All staff, including those who do not work directly with children, are expected to understand and follow the same safeguarding expectations set out in Part one.

- Read and understand Part one of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, anti-child on child abuse and positive conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, Online safety policy and the safeguarding response to children who go missing from education/who are absent from education. The Family Help and early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The indicators of prejudice-based harm, including racism, faith-targeted abuse and other discriminatory behaviour, and the potential impact these experiences may have on a child's welfare, mental health, attendance, educational engagement and ability to seek support.
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm, including generative AI, harmful online content, technologically facilitated abuse, financial exploitation and other emerging forms of exploitation.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online

- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children and may need a trusted adult and pastoral support to reduce barriers to speaking out.
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Section 16 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)
The DSL is a member of the senior leadership team. Our DSL is Will Bratt Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

The school will maintain robust DSL cover arrangements so that staff always know how to raise urgent safeguarding concerns when the DSL is unavailable. This may include a confidential safeguarding mailbox, published deputy DSL rota, or other arrangements agreed locally.

When the DSL is absent, the deputies – Lucy Harper and Kyle Morrison will act as cover.

If the DSL and deputies are not available, Hannah Wilkes, will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will be given the time, funding, training, resources and support to:
- Provide advice and support to other staff on child welfare and child protection matters
- Oversee and support information sharing so that safeguarding records, referrals, decisions and rationale are held and shared appropriately, in line with KCSIE 2026 and data protection laws.
- Ensure staff understand local arrangements for Family Help, early help and escalation where concerns do not improve.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Make sure that staff have appropriate Prevent training and induction

The DSL will also:
- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

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

5.3 The governing board

The governing board will:

- Ensure filtering and monitoring arrangements are reviewed at least annually, with records kept of checks, findings and any remedial action taken.
- Ensure the school has clear and robust cover arrangements when the DSL is unavailable, including how urgent safeguarding concerns will be received and acted upon.
- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead trustee and link associate governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
    - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
    - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

5.4 The headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems that support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

5.5 Virtual school heads

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

6. Confidentiality

The school recognises that effective safeguarding depends upon the timely and appropriate sharing of information. We are committed to maintaining the confidentiality of pupils and families wherever possible whilst recognising that the welfare of the child is paramount.

The school processes personal data in accordance with the **UK General Data Protection Regulation**, the **Data Protection Act 2018**, and relevant safeguarding legislation. Data protection legislation does not prevent, or limit, the sharing of information where this is necessary to safeguard or promote the welfare of children.

The Designated Safeguarding Lead is responsible for ensuring appropriate information sharing takes place in accordance with statutory guidance.

When pupils transfer to another school or education provider, the DSL will ensure that safeguarding files are transferred securely and separately from the main educational record, and that receipt is confirmed. The DSL will discuss any significant safeguarding concerns directly with the receiving DSL where appropriate.

The school works collaboratively with the safeguarding partners and other agencies to ensure children receive the right help at the right time. This includes participation in multi-agency meetings, Child Protection Conferences, Child in Need meetings, Early Help arrangements and other safeguarding processes where appropriate.

The school ensures:

- Timely information sharing is essential to effective safeguarding

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
  - The DSL should consider that:
- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3.

7. Recognising abuse and taking action

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

- Staff should consider whether children and families may benefit from Family Help, community-focused early help, targeted support or referral to children's social care, and should not wait for concerns to escalate before taking action.
- Staff should be alert to overlapping safeguarding issues, including modern slavery, financial exploitation, childon-parent/carer abuse, misogyny, incel-related concerns, online harm and serious violence.
- Has a disability
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved

- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage • Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger
Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

The school follows the safeguarding arrangements and threshold guidance established by the Dudley Safeguarding People Partnership (DSPP) and works in partnership with Dudley Children's Front Door, Children's Social Care, West Midlands Police, Health partners and other relevant agencies to safeguard and promote the welfare of children.

Where there are concerns that a child may be suffering, or is likely to suffer, significant harm, the Designated Safeguarding Lead or deputies, will make an immediate referral to Dudley Children's Front Door. Staff should report all safeguarding concerns to the DSL without delay. However, any member of staff may make a referral directly to Children's Social Care if they believe a child is at immediate risk of harm. The DSL must be informed as soon as possible afterwards.

Where concerns do not meet the threshold for statutory intervention but indicate that a child or family would benefit from additional support, the school will work with families and partner agencies to access the most appropriate level of help, including universal services, community-based Early Help, targeted Family Help or other local support, in line with the Dudley Threshold Framework. Staff should not wait for concerns to escalate before seeking advice or support.

The school recognises that safeguarding is a shared responsibility and will share information with partner agencies where this is necessary to protect a child, in accordance with the Data Protection Act 2018, UK GDPR and statutory safeguarding guidance.

Local contacts:

Dudley Children's Front Door (Office Hours: Monday-Friday, 9.00am-5.00pm): 0300 555 0050 (Option 3)

Emergency Duty Team (Out of Hours): 0300 555 8574
Emergency: 999 where a child is at immediate risk of significant harm.

Referrals should be made in accordance with the Dudley Threshold Framework and, where appropriate, via the Dudley Children's Portal using the online referral process. Advice and guidance on thresholds, Early Help and referral pathways can be accessed through Dudley Children's Services and the Dudley Safeguarding People Partnership.

Further information is available from:

- Report a concern about a child or young person (Dudley Council)
- Dudley Children's Services Portal
- Report child abuse to your local council (GOV.UK)

Where a child resides outside the Dudley local authority area, the school will follow the safeguarding procedures, referral pathways and threshold guidance of the child's home local authority. The Designated Safeguarding Lead will work collaboratively with the relevant Children's Social Care team, safeguarding partners and other agencies to ensure concerns are referred promptly and that the child receives the appropriate support and protection, regardless of where they attend school.

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

Where there is a concern that a girl may be at risk of FGM, but the mandatory reporting duty does not apply, the DSL will make an immediate referral to Dudley Children's Front Door in accordance with local safeguarding procedures and, where appropriate, seek advice from the police and other safeguarding partners.

Where a child lives outside the Dudley local authority area, referrals relating to FGM will be made in accordance with the safeguarding procedures of the child's home local authority, whilst continuing to work closely with the relevant police force and safeguarding partners to ensure the child is protected.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Family Help / early help assessment

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

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Where appropriate, the DSL or member of the safeguarding team will work with the child, family and partner agencies to complete an Early Help Assessment (EHA) and coordinate support through Dudley's Family Help arrangements. Where a multi-agency response is required, the school will contribute to Team around the Family meetings and work collaboratively with partner agencies to improve outcomes for children.

Where concerns indicate that a child is suffering, or is likely to suffer, significant harm, an Early Help Assessment will not delay an immediate referral to Dudley Children's Front Door, in line with the Dudley Threshold Framework. Where a child resides outside the Dudley local authority area, the school will work with the relevant local authority and follow the Early Help and safeguarding procedures applicable to the child's home area.

Further guidance is available from:

- Dudley Early Help and Family Support
- Dudley Children's Services Portal

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority should make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

If there are concerns that appropriate action has not been taken, or a child's circumstances are not improving, the DSL will use the Dudley Safeguarding People Partnership's professional challenge and escalation procedures to seek resolution. If necessary, concerns will be escalated through senior managers within Children's Social Care or to other safeguarding partners to ensure the child's welfare remains paramount.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

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.

- Staff should treat any immediate risk to a child's safety as urgent and follow safeguarding procedures without delay, including seeking emergency assistance where required.
- Mental health concerns should be considered alongside wider safeguarding information, including changes in behaviour, attendance, peer relationships, online activity and family circumstances.

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

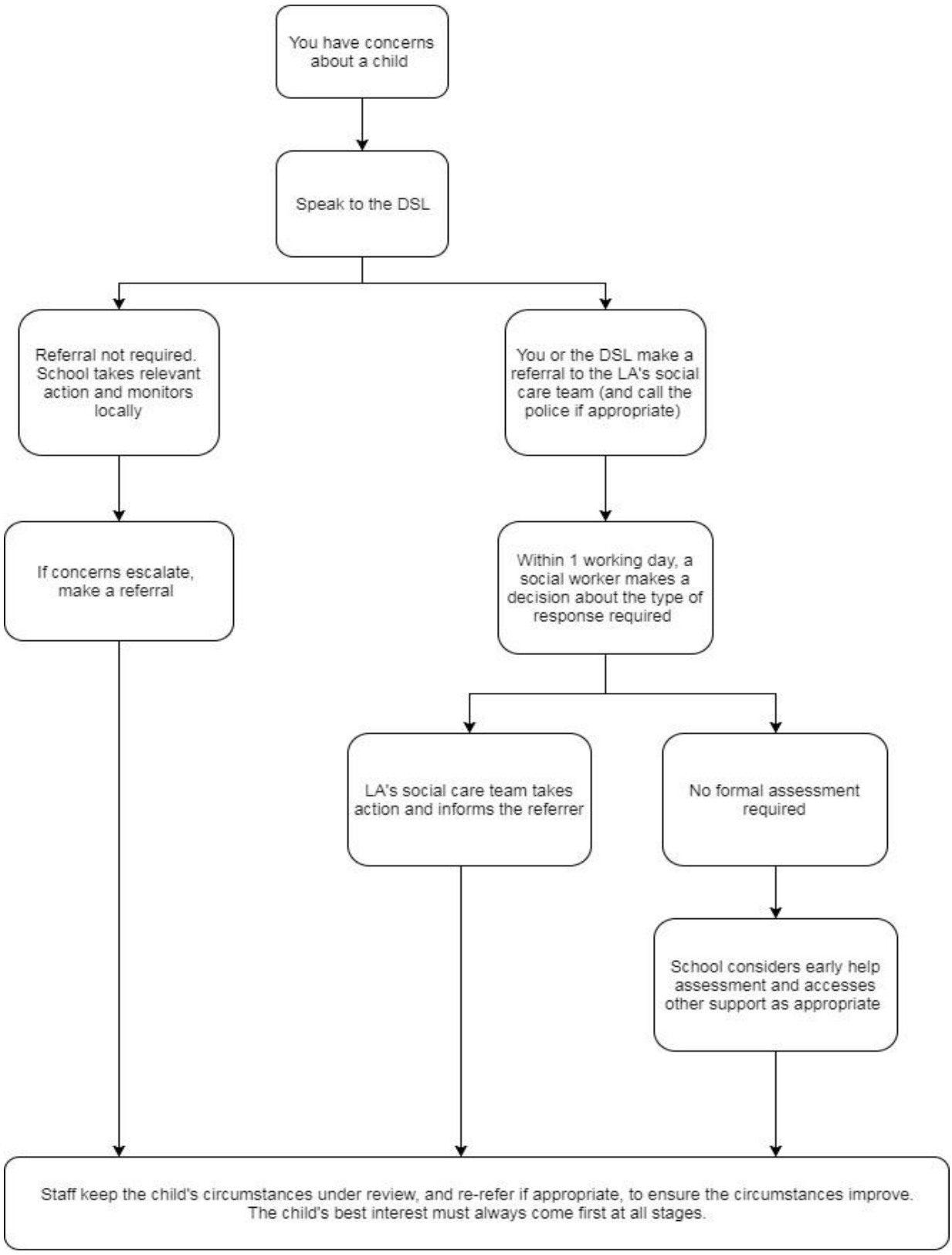
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

The school will work with pupils, families and partner agencies, including health services, Children's Social Care, Early Help/Family Help, CAMHS and other specialist services, to ensure that children receive timely and appropriate support. Where there is an immediate risk of harm to a pupil or others, staff will follow the school's safeguarding procedures and, where necessary advise parents/ carers to take the child to A&E or contact emergency services.

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Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)
(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the Director of Education the Deputy CEO or Director of Human Resources.

The headteacher will then follow the procedures set out in appendix 3, if appropriate.

If the concerns/allegations are about the headteacher, speak to the local authority designated officer (LADO).

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing nudes and seminudes)

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.
The DSL will ensure that each allegation is considered on its own merits and that all decisions are proportionate, evidence-based and centred on the safety and welfare of those involved. The wishes of the victim will be considered wherever possible, alongside the school's duty to protect all pupils.

The school will take immediate steps to safeguard the victim and reduce the risk of further harm. This may include changes to timetables, seating plans, break and lunchtime arrangements, supervision, movement around the school, educational visits and transport arrangements where appropriate. These measures will be regularly reviewed and adapted in response to changing circumstances.

The alleged perpetrator will also be supported and, where appropriate, educated to understand the impact of their behaviour. Appropriate sanctions may be applied in line with the school's positive conduct policy, alongside pastoral support and referrals to external agencies where required.

The school recognises that child-on-child abuse can have a significant impact on other pupils who witness or are affected by an incident. Appropriate support will therefore be offered to any other children impacted.

All allegations, risk assessments, decisions, actions taken and outcomes will be recorded on the school's safeguarding recording system. The DSL will regularly review risk assessments and support plans to ensure they remain effective and that all children continue to receive appropriate support.

Where appropriate, the school will work closely with parents/carers and relevant partner agencies to ensure a coordinated approach to safeguarding, while taking account of the wishes of the victim and any advice provided by Children's Social Care or the police.

Creating a supportive environment in school and minimising the risk of child-on-child abuse
We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

- Children can show signs or act in ways they hope adults will notice and react to
- A friend may make a report
- A member of staff may overhear a conversation
- A child's behaviour might indicate that something is wrong ○ That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL if they have any concerns
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-bycase basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Making or sharing nudes and semi-nudes ('sexting')

The school recognises that incidents involving the consensual or non-consensual creation, possession or sharing of nude or semi-nude images or videos can be a safeguarding issue and should be responded to promptly, proportionately and in line with national guidance.

For further information refer to:

Guidance from the UK Council for Internet Safety and Department for Science, Innovation and Technology for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are AI-generated or digitally altered images that otherwise appear to be a photograph or video (also known as 'sexting' or 'nudes and semi-nudes'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it

- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing nudes and seminudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers
The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police
If it is necessary to refer an incident to the police, this will be done through calling 101.

The school will ensure that appropriate support is provided to all children involved, including victims, alleged perpetrators and any affected bystanders. Parents/carers will normally be informed unless doing so would place a child at increased risk of harm or compromise a safeguarding investigation

Recording incidents
All incidents of making or sharing nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage
The below is provided as an example of how you might demonstrate the way your curriculum covers the making or sharing nudes and semi-nudes. Insert details of your own approach here.

Pupils are taught about the issues surrounding the making or sharing nudes and semi-nudes as part of our [relationships education / relationships and sex education – delete as applicable] and computing programmes. Teaching covers the following in relation to the making or sharing nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the making or sharing nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils
Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

The school encourages all pupils to speak to a trusted adult if they have any concerns about their own safety or the safety of another child. Pupils can report concerns to any member of staff, including their Form Tutor, Head of Year, Pastoral Support Manager, the Designated Safeguarding Lead or Deputy DSLs. Pupils are regularly reminded that any member of staff will listen to them, take their concerns seriously and ensure they receive the appropriate support.

The school strives to create a culture in which pupils feel safe, respected and confident to report concerns. Staff listen carefully to pupils, take all disclosures seriously and respond in a calm, supportive and non-judgemental manner. Pupils are reassured that they have done the right thing by speaking up and are kept informed, where appropriate, about what will happen next. They are never promised confidentiality, but staff will explain that information will only be shared with those who need to know in order to help keep them safe.

Where appropriate, ongoing pastoral and safeguarding support will be provided following a disclosure to ensure that pupils continue to feel safe and supported within the school community.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

- Online safety includes the safe and effective use of generative AI in education. Filtering and monitoring expectations apply to AI tools used in school, and staff should remain aware of the risk of AI-generated or digitally altered content being used to harm, bully, coerce or exploit children.
- The school's mobile phone and smart technology arrangements will reflect KCSIE 2026, including a clear approach to use of personal devices, multiple-device scenarios and how concerns are identified, recorded and escalated.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

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

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

At Blackwater Academy Stourbridge, we are committed to ensuring that all pupils are taught how to keep themselves and others safe both online and offline. Online safety is embedded throughout the curriculum, assemblies, tutor time and themed awareness events. Pupils are taught about online relationships, consent, privacy, digital footprints, cyberbullying, misinformation and disinformation, the responsible use of social media, online scams, gaming, artificial intelligence (AI), and how to recognise, respond to and report online abuse, exploitation and inappropriate content.

The school recognises that effective online safety education must be age-appropriate, progressive and responsive to emerging risks. Teaching is adapted to meet the needs of individual pupils, including those with SEND and those who may be more vulnerable to online harm. Staff receive regular safeguarding and online safety training to ensure they are aware of current and emerging risks and understand the procedures for identifying, recording and responding to online safety concerns.

The school uses appropriate filtering and monitoring systems to help protect pupils while using the school's IT systems. The effectiveness of these systems is regularly reviewed, and safeguarding concerns identified through filtering and monitoring are acted upon promptly in accordance with the school's safeguarding procedures. The Designated Safeguarding Lead (DSL) works closely with the IT provider and senior leaders to ensure that filtering and monitoring arrangements remain effective, proportionate and compliant with statutory guidance.

To meet our aims and address the risks above, we will:

- Deliver a progressive and age-appropriate online safety curriculum through PSHCE, Computing, assemblies, tutor time and other curriculum opportunities. Pupils will be taught about:
    - Safe and responsible use of the internet, social media, mobile devices and emerging technologies, including generative AI.
    - Keeping personal information secure and protecting their digital identity. o Healthy online relationships, consent and respectful online behaviour.
    - Recognising online abuse, exploitation, cyberbullying, misinformation, disinformation, online scams and other harmful content.
    - How to report online concerns and seek support, whether they are a victim or witness.
- Ensure all staff receive safeguarding and online safety training as part of their induction and regular safeguarding updates. Training will include cyberbullying, online exploitation, online radicalisation, filtering and monitoring, the safe use of technology and AI, and emerging online risks.
- Provide parents and carers with information and guidance on online safety through the school's website, newsletters, parent information evenings and other communications, including information on how to report concerns.
- Ensure staff understand and comply with the school's expectations regarding the use of personal mobile devices and smart technology. Staff must not use personal devices to photograph, film or record pupils or access personal devices during teaching or supervisory duties unless authorised.
- Require pupils, staff, volunteers, governors and visitors, where appropriate, to comply with the school's Acceptable Use Agreements and ICT policies.
- Apply appropriate sanctions and safeguarding responses where pupils misuse technology or breach the school's Acceptable Use, Behaviour or Mobile Phone Policies.
- Ensure staff understand their powers to search, confiscate and examine electronic devices where appropriate, in accordance with the school's Positive Conduct Policy and the Department for Education's guidance on Searching, Screening and Confiscation.
- Maintain effective filtering and monitoring systems that are proportionate to the school's safeguarding needs and regularly reviewed by safeguarding and technical staff. Any concerns identified through filtering or monitoring will be risk assessed, recorded and acted upon in accordance with safeguarding procedures.
- Undertake an annual review of the school's online safety arrangements, including filtering and monitoring, informed by an annual risk assessment and any local or national emerging risks. Findings and actions will be documented and implemented.

- Provide regular safeguarding updates to staff throughout the academic year to ensure they remain aware of current online safety risks, local safeguarding issues and changes to statutory guidance.
- Review this Child Protection and Safeguarding Policy, together with the school's Online Safety Policy and associated procedures, at least annually and whenever statutory guidance or local safeguarding arrangements change.
- This section provides an overview of the school's approach to online safety and the use of mobile technology. Further information, including detailed filtering and monitoring arrangements, acceptable use expectations and mobile phone procedures, can be found in the school's Online Safety Policy, ICT Acceptable Use Policy, Mobile Phone Policy and Positive Conduct Policy, all of which are available on the school's website.

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Blackwater Academy Stourbridge recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Blackwater Academy Stourbridge High School will treat any use of AI to access harmful content or bully pupils in line with this policy and the trust child on child abuse policy and artificial intelligence policy.

Staff should be aware of the risks of using AI tools while they are still being developed and must carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education. Any use of AI to create, alter, share or threaten to share harmful images, audio, video or other content will be managed as a safeguarding concern and, where appropriate, referred to the police and/or children's social care.

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL. If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- KCSIE 2026 strengthens the focus on safeguarding children with medical conditions. Staff will consider medical needs alongside SEND, attendance, mental health and pastoral information when identifying possible safeguarding concerns.
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

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

- A named key adult, such as a Form Tutor, Head of Year, Pastoral Support Manager or SEND key worker, to provide regular support and act as a trusted adult.
- Close collaboration between the SENDCo, Designated Safeguarding Lead (DSL), pastoral teams, attendance team and relevant health professionals to ensure safeguarding concerns are identified and responded to promptly.
- Individual risk assessments, safety plans and support plans where appropriate.
- Adapted communication strategies and reasonable adjustments to enable pupils to express their views, wishes and feelings and report concerns.
- Targeted interventions to promote emotional wellbeing, resilience, positive relationships and online safety.
- Enhanced supervision, pastoral check-ins and monitoring where a pupil is identified as vulnerable or at increased risk.
- Appropriate support during periods of transition, including transition into school, between key stages and when moving to alternative provision or another educational setting.
- Multi-agency working with families and external agencies, including Children's Social Care, Family Help, health services, CAMHS and other specialist professionals, where additional support is required.
- Regular review of attendance, behaviour, medical, safeguarding and wellbeing information to ensure that emerging concerns are identified and responded to at the earliest opportunity.

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

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks • The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

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

We have appointed a designated teacher, Will Bratt Headteacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

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

We have appointed an appropriately trained teacher, Will Bratt Headteacher, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

13. Pupils who are lesbian, gay, bisexual or gender questioning

KCSIE 2026 includes updated content on supporting children who are lesbian, gay, bisexual or gender questioning. The school will follow the statutory guidance in force from 1 September 2026 and any linked DfE guidance, taking a cautious, child-centred and safeguarding-led approach.

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

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

The school provides a supportive, inclusive and respectful environment for all pupils. Pupils who are lesbian, gay, bisexual or gender questioning will have access to appropriate pastoral support through their, Head of Year, Pastoral Support Manager, the Designated Safeguarding Lead (DSL) or Deputy DSLs, and other trusted adults within school. Where appropriate, pupils may also be signposted or referred to external support services to meet their individual needs.

When families/carers are making decisions about support for gender questioning pupils, the school will encourage them to seek appropriate clinical advice and support. Decisions will be made carefully, considering the child's individual needs, parental/carer involvement unless this would increase risk of harm, available clinical advice, and any wider vulnerabilities such as mental health needs, neurodiversity or bullying risk.

The school will not make unilateral changes relating to social transition. Any support will be considered through agreed safeguarding procedures, with appropriate involvement of parents/carers and relevant professionals unless doing so would place the child at risk of significant harm.

School arrangements for toilets, changing rooms, residential visits and sport will comply with statutory guidance and relevant equality, safeguarding and premises requirements. Any individual arrangements will be risk assessed and kept under review.

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

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

14.2 Other complaints

The school takes all safeguarding concerns and complaints seriously and is committed to ensuring that they are investigated fairly, promptly and in accordance with statutory guidance and the school's procedures.

Complaints relating to safeguarding, including concerns about the conduct of pupils, the school's safeguarding practices, the safety of the school environment or the implementation of safeguarding procedures, should be raised with the Designated Safeguarding Lead (DSL) or the Headteacher in the first instance.

Where a complainant believes that their concerns have not been addressed appropriately, or where the complaint relates to the Headteacher, the matter should be referred in accordance with the school's Complaints Policy which can be found on the school website.

Where a safeguarding concern meets the threshold for referral, or where there is a concern that a child is suffering or is likely to suffer significant harm, the school's safeguarding procedures will take precedence over the complaints process. Referrals will be made to Children's Social Care, the Local Authority Designated Officer (LADO), the police or other relevant agencies as appropriate.

The school will not investigate or resolve safeguarding concerns through the complaints process where statutory safeguarding procedures are required. All safeguarding complaints and concerns will be recorded and managed in line with the school's Child Protection and Safeguarding Policy and local safeguarding procedures.

14.3 Whistleblowing

The school maintains a commitment to processes that allow for concerns to be raised about safeguarding practice. The school's commitment is outlined in the Whistleblowing Policy which is located on the school website.

15. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Information sharing decisions will be recorded, including the rationale for sharing or not sharing information and the legal basis relied upon where appropriate.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

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

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

- Safeguarding records are maintained electronically using the school's secure safeguarding recording system (CPOMS). Access is strictly restricted to the Designated Safeguarding Lead, Deputy DSLs and other authorised staff on a need-to-know basis. Records are securely stored and managed in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018, the school's Data Protection Policy and Records Retention Policy.
- All safeguarding records are factual, accurate, timely and include the actions taken, decisions made, rationale for those decisions and any outcomes. Where information is shared with another agency, or a decision is made not to share information, the reasons for that decision and, where appropriate, the lawful basis for sharing will be recorded.
- The school will share safeguarding information with Children's Social Care, the police, health professionals, education providers and other relevant agencies where it is necessary to safeguard or promote the welfare of a child, in accordance with statutory guidance and the information sharing principles set out in Working Together to Safeguard Children and Keeping Children Safe in Education. Information will be shared lawfully, proportionately, securely and only with those who need to know.

- Child protection records will be retained in accordance with the school's Records Retention Policy and relevant statutory guidance. Where safeguarding records are transferred to another school or college, the DSL will obtain confirmation that the records have been received and will retain a record of the transfer

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and preappointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

Training will reflect KCSIE 2026, including Family Help, information sharing, online safety, filtering and monitoring, generative AI, serious violence, mental health, child-on-child abuse, children with medical conditions and children who may face additional barriers to disclosure.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:

  ○ Manage behaviour effectively to ensure a good and safe environment ○ Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

16.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.
In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

16.3 Trustees/Associate Governors

All trustees/associate governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Governor/trustee training will include understanding the annual review of filtering and monitoring systems and the board's role in assuring DSL cover arrangements.
- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

16.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

16.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Monitoring arrangements

This policy will be reviewed **annually** by The Trust Lead for Safeguarding and at every review, it will be approved by the Trust Board.

18. Appendices

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

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing, causing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration or non-penetrative acts, or non-contact activities such as involving children in looking at or producing sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Children under the age of 13 can never legally consent to sexual activity. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

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

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

Appendix 2: safer recruitment and DBS checks – policy and procedures

Please see our Safer recruitment policy.

Appendix 3: allegations of abuse made against staff

Allegations against staff (including low-level concerns)

Please see our management of allegations against staff policy.

Appendix 4: specific safeguarding issues

All staff should be aware of the safeguarding issues set out in **Keeping Children Safe in Education (KCSIE) 2026**, including those detailed within the relevant annexes, and understand that many safeguarding concerns can overlap.

The Designated Safeguarding Lead (DSL) will ensure that staff receive regular safeguarding updates, enabling them to recognise emerging risks, understand local safeguarding priorities and respond appropriately to concerns. Staff should be particularly alert to the following safeguarding issues, which are not exhaustive:

- Abuse, neglect and exploitation.
- Child-on-child abuse.
- Child sexual exploitation (CSE).
- Child criminal exploitation (CCE), including county lines.
- Serious violence.
- Domestic abuse.
- Modern slavery and human trafficking.
- Female Genital Mutilation (FGM).
- Forced marriage.
- Honour-based abuse.
- Radicalisation and extremism (Prevent).
- Online safety, including AI-enabled abuse, cybercrime, online exploitation, sharing of nudes and semi-nudes, misinformation and disinformation.
- Children missing education.
- Mental health where it becomes a safeguarding concern.
- Substance misuse.
- Homelessness.
- Child-on-parent or carer abuse.
- Financial exploitation.
- Upskirting and other image-based abuse.
- Bullying, including prejudice-based bullying.
- Private fostering.
- Children with family members in prison.
- Child abduction and community safety incidents.

Staff should always report safeguarding concerns to the Designated Safeguarding Lead without delay. The school will work in partnership with **Dudley Safeguarding People Partnership**, **Dudley Children's Front Door**, West Midlands Police, health services and other relevant agencies, or with the safeguarding partners for a child's home local authority where they reside outside Dudley, to ensure children receive the right help at the right time.

The school recognises that safeguarding issues rarely occur in isolation. Staff should maintain an attitude of **"it could happen here"**, exercise professional curiosity and consider the cumulative impact of multiple vulnerabilities when assessing a child's needs.

Further guidance can be found in the following documents and websites:

- Keeping Children Safe in Education (DfE)
- Working Together to Safeguard Children (DfE)
- Information Sharing: Advice for Practitioners (DfE)
- Teaching Online Safety in Schools (DfE)
- Sharing Nudes and Semi-Nudes: Advice for Education Settings (UKCIS)
- Prevent Duty Guidance (Home Office)
- Dudley Safeguarding People Partnership (DSPP)
- Dudley Children's Front Door and Children's Services Portal

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.
Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first

- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

We endorse that the DfE's Working together to improve school attendance is now statutory guidance and align our absence management practise to this document.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into

moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child: •
Having an older boyfriend or girlfriend

- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

KCSIE 2026 expands this section to emphasise that safeguarding issues can overlap and that schools should consider the full context, including peer group dynamics, online activity, family and community factors, and any links with wider exploitation or violence.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Racism, faith-targeted abuse and other discriminatory behaviour that causes harm to a child's welfare, safety, emotional wellbeing or educational experience.
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or nudes and semi-nudes)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.
Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

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

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

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)
So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM
The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:

    - Having difficulty walking, sitting or standing, or looking uncomfortable ○ Finding it hard to sit still for long periods of time (where this was not a problem previously) ○ Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems ○ Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations ○ Asking for help, but not being explicit about the problem ○ Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because ○ she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**

    ○ Negate or destroy the fundamental rights and freedoms of others; or
    ○ Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or

- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

- **Terrorism** is an action that:

- Endangers or causes serious violence to a person/people; - Causes serious damage to property; or - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk. We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's approach to preventing radicalisation and extremism can be found in the following policies and procedures:

- Child Protection and Safeguarding Policy
- Positive Conduct Policy
- Online Safety Policy
- Acceptable Use of ICT Policy
- Relationships, Sex and Health Education (RSHE) Policy
- Curriculum Policy
- Equality, Diversity and Inclusion Policy
- Staff Code of Conduct
- Visitor Management Procedures

These policies collectively promote fundamental British values, respectful relationships, critical thinking, online safety and digital resilience, and support pupils to recognise and challenge extremist ideologies, misinformation and disinformation, harmful online influences and radicalising content.

Child-on-child sexual harassment and sexual violence

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Harmful sexual behaviour, sexual harassment and sexual violence exist on a continuum and may overlap. The school will respond proportionately and consistently, safeguarding all children involved and considering their age, stage of development, vulnerabilities, context and support needs.

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual or transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence
Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include: Staff must report concerns about a child using, carrying or intending to use a weapon, or being drawn into serious violence, to the DSL immediately so that risk can be assessed and appropriate safeguarding action taken.

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

Risk factors which increase the likelihood of involvement in serious violence include:
- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

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

Checking the identity and suitability of visitors
The school operates a colour-coded lanyard system to clearly identify the level of safeguarding clearance and authorisation of all adults on site, including staff, governors, volunteers, contractors and visitors. All staff and pupils are made aware of the meaning of each lanyard colour and are expected to remain vigilant. Any individual not displaying the appropriate identification or wearing a lanyard inconsistent with their access permissions will be politely challenged and, where necessary, reported immediately to the school office or a senior member of staff. This forms part of the school's commitment to maintaining a secure environment and ensuring that only appropriately authorised adults have access to pupils.
The meaning of each lanyard colour is communicated to all staff and pupils at the start of each academic year and is reinforced through staff induction, pupil assemblies and regular safeguarding reminders.

All visitors will be required to verify their identity to the satisfaction of staff. Visitors will need to adhere to our Trust's mobile and digital device policy.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

Where a pupil who is expected to be collected is not collected at the end of the school day or following a school activity, the school will take reasonable steps to ensure the pupil's safety and welfare.

The member of staff responsible will:

- Ensure the pupil remains supervised in a safe location.
- Make reasonable attempts to contact the parent/carer and any other emergency contacts held on the school's management information system.
- Inform a member of the Senior Leadership Team and, where appropriate, the Designated Safeguarding Lead (DSL).
- Keep a record of all attempts to contact parents/carers, the actions taken and the outcome.

If the school is unable to contact a parent/carer or emergency contact within a reasonable period and there are concerns about the child's welfare, Children's Social Care and/or the police will be contacted for advice and appropriate action.

Where non-collection becomes a recurring concern, the matter will be discussed with parents/carers and may be referred to the Designated Safeguarding Lead (DSL) for consideration of any underlying safeguarding concerns or the need for additional support through Early Help or other agencies.

The school will never send a pupil home with an unauthorised adult. Where a pupil is collected by an adult who is unfamiliar to staff, appropriate identification and, where necessary, confirmation from the parent/carer will be sought before the pupil is released.

All incidents of non-collection will be recorded in accordance with the school's safeguarding and record-keeping procedures.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Immediately inform the school office, the Designated Safeguarding Lead (DSL) or a member of the Senior Leadership Team.
- Carry out an immediate search of the school site and check with staff, classmates, timetables, registers and any authorised locations where the pupil may be.
- Ensure that the supervision and safety of all other pupils is maintained throughout.
- Contact the pupil's parent or carer without delay to establish whether they have returned home or made contact.
- If the pupil cannot be located quickly, or there are concerns that they may be at risk of harm, contact the police immediately and follow their advice.

- Where appropriate, notify Children's Social Care in accordance with local safeguarding procedures, particularly where the pupil is vulnerable or there are known safeguarding concerns.
- Continue to liaise with parents/carers, the police and other agencies until the pupil has been located and their safety confirmed.

When the pupil is found, the school will establish the circumstances surrounding the incident, consider whether any safeguarding concerns are present and determine whether further action, support or referrals are required. Where appropriate, the DSL will undertake a risk assessment and work with the pupil, family and partner agencies to reduce the likelihood of any recurrence.

All incidents involving a missing pupil will be recorded on CPOMS, including the timeline of events, actions taken, decisions made, agencies involved and the outcome. The DSL will review the incident to identify any lessons learned and ensure that any ongoing safeguarding concerns are appropriately managed.

Service	Contact Details
Children's Services (Children's Front Door)	0300 555 0050 (Option 3) Monday-Friday, 9.00am-5.00pm
Adult Social Care (Adults Front Door)	0300 555 0055 Monday-Friday, 9.00am-5.00pm
Out of Hours Emergency Duty Team	0300 555 8574 Weekdays 5.00pm-9.00am, weekends and bank holidays
Emergency Services	999 (Where a child or adult is at immediate risk of harm)
Dudley Safeguarding People Partnership (DSPP)	https://www.dspp.org.uk
Early Help Information	https://www.dudley.gov.uk/residents/care-and-support-forchildren/early-help-for-families/
Children's Social Care Portal	https://childrensocialcare.dudley.gov.uk/web/portal/pages/home
Local Authority Exploitation Toolkit	https://dudleysafeguarding.org.uk/children/professionalsworking-with-children/child-exploitation/
Threshold Framework	https://www.dspp.org.uk/professionals/threshold-framework/
Report a Child Protection Concern	https://www.dudley.gov.uk/residents/care-and-support-forchildren/child-protection/

National Contacts:
Police (Non-emergency 101)
CEOP (Child Exploitation and Online Protection) https://www.ceop.police.uk/Safety-Centre/

Working together to Safeguard Children:
https://assets.publishing.service.gov.uk/media/681b42043f1c73824ee3e4f0/Children_and_young_person_guide_to_working_together_to_safeguard_children.pdf