



# **Safeguarding and Young People Protection Policy 2025 - 2026**

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<b>Responsible Officer</b>	<b>Ascent Academies' Trust Safeguarding Lead</b>

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Children's social care	North Yorkshire Council County Hall Northallerton DL7 8AD Tel: 0300 131 2131
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Multi-agency safeguarding hub	Multi-Agency Screening Team (MAST) Tel: 0300 131 2 131  Professional's Consultation Line 01609 535070 is available between 10am and 4pm  <a href="https://www.northyorks.gov.uk/children-and-families/safeguarding-children">https://www.northyorks.gov.uk/children-and-families/safeguarding-children</a>
Police / law and order	Emergency: 999 Non-emergency: 101  Prevent team <a href="https://www.northyorkshire.police.uk/advice/advice-and-information/t/prevent/prevent/">https://www.northyorkshire.police.uk/advice/advice-and-information/t/prevent/prevent/</a>  Anti-terrorist hotline 0800 789 321
NSPCC whistleblowing helpline (Mon-Fri 8am-8pm)	Address: Weston House, 42 Curtain Road, London EC2A 3NH Helpline: 0800 028 0285
Disclosure and barring service (DBS)	Address: PO Box 3961, Royal Wootton Bassett, SN4 4HF <a href="mailto:customerservices@db.gov">customerservices@db.gov</a> Tel: 03000 200190
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Independent Schools Inspectorate	<a href="mailto:concerns@isi.net">concerns@isi.net</a> Tel: 0207 6000 100

## GUIDANCE AND ADVICE DOCUMENTS

This policy has regard to the following guidance and advice:

- Keeping Children Safe in Education. (DfE 2025) (**Statutory** guidance)
- Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children. (HM Government 2018: updated July 2022 to include Integrated Care Boards, Public Health England, Domestic Abuse Act 2021 and UK GDPR, updated Dec 2023)
- Multi-agency statutory guidance on female genital mutilation (HM Government July 2020) **Statutory** guidance
- Relationships Education, Relationships and Sex Education (RSE) and Health Education guidance (DfE September 2025) Statutory guidance
- Children Missing Education (DfE 2024). Guidance for Local authorities
- Statutory framework for the early years foundation stage (DfE 2025). Statutory guidance
- Revised Prevent duty guidance: for England and Wales (HM Government September 2023) (**Statutory** guidance)
- The Prevent duty: Departmental advice for schools and childcare providers (DfE September 2023) (**Advice** for schools)
- Guidance (**non-statutory**) for safer working practice for those working with children and young people in education settings. (Safer Recruitment Consortium February 2022)
- What to do if you're worried a child is being abused (HM Government March 2015)
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government May 2024)
- Local authority / safeguarding partnership advice and guidance
- Working together to improve school attendance Guidance for maintained schools, academies, independent schools, and local authorities (non-statutory -applies from: August 2024)

## POLICY STATEMENT

Safeguarding and promoting the welfare of young people is of paramount importance and is everyone's responsibility.

It is the responsibility of *every* colleague, volunteer and regular visitor to Springwater Academy to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of its young people. This includes the responsibility to provide a safe environment in which all young people can learn.

We recognise that colleagues at our academy play a particularly important role as they are in a position to identify concerns early and provide help for young people to prevent concerns from escalating. **All colleagues are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.** When concerned about the welfare of a young person, colleagues must always act in the **best interests** of the young person.

Springwater Academy will establish and maintain an ethos where young people feel secure, are encouraged to talk, are listened to and are safe. Young people will be able to talk freely to any member of our Springwater colleagues if they are worried or concerned about something.

All colleagues and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a young person and how to record and report this information. We will not make promises to any young person, and we will not keep secrets. Every young person will know what the adult will have to do with any information they have chosen to disclose.

Throughout our curriculum we will provide activities and opportunities for young people to develop the skills they need to identify risks and stay safe, including online. This will also be extended to include material that will encourage our young people to develop essential life skills.

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2023) and local safeguarding partners' procedures.

This policy is reviewed and updated annually (as a minimum) and is available on the Trust/Academy website or from the academy office.

This policy applies to all colleagues, young people, parents, Trustees, volunteers and visitors.

## DEFINITION OF SAFEGUARDING

Safeguarding and promoting the welfare of children is defined as:

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

**(KCSIE 2025)**

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

Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

***Working Together to Safeguard Children 2023***

## ABUSE

**Abuse:** a form of maltreatment of a young person. Somebody may abuse, neglect or exploit a young person by inflicting harm or by failing to act to prevent harm. Young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Young people/children may be abused by an adult or adults or by another child/young person or children/young people. Abuse can also be a result of children witnessing the ill-treatment of others, such as seeing, hearing or experiencing domestic abuse and its effects.

### **Abuse, neglect and exploitation**

All colleagues will be made aware of indicators of abuse, neglect or exploitation. Knowing what to look for is vital for the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation so that colleagues are able to identify cases of children who may be in need of help or protection.

If colleagues are unsure, they should always speak to the designated safeguarding lead (DSL) or deputy.

Abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore colleagues should always be vigilant and always raise any concerns with the DSL.

Safeguarding incidents and/or behaviours can be associated with factors outside the academy and/or can occur between young people outside of this environment. All colleagues, but especially the DSL should consider whether children/young people are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children/young people can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

Technology is a significant component in many safeguarding and wellbeing issues. Young people are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Young people can also abuse young people online, this can take the form of 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 do not want to receive such content.

In all cases, if colleagues are unsure, they should always speak to the DSL.

Further information about the different kinds of abuse can be found in the appendices.

CONFIDENTIAL

## PROCEDURES FOR DEALING WITH CONCERNS ABOUT A YOUNG PERSON

### What colleagues should do if they have a concern about a young person

All colleagues **must** report **any** concerns they have about a young person and not see these as insignificant. Colleagues should **not** assume a colleague, or another professional will take action and share the concern.

On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that colleagues record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the young person at the earliest opportunity.

A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

Colleagues **must** immediately report **any**:

- Suspicion that a young person is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play / everyday, normal activities
- Explanation given which appears inconsistent or suspicious
- Behaviours which give rise to suspicions that a young person may have suffered harm (e.g. worrying drawings, play, actions)
- Concerns that a young person may be suffering from inadequate care, ill treatment or emotional maltreatment, inside or outside of the home, including online.
- Concerns that a young person is presenting signs or symptoms of abuse or neglect
- Significant changes in a person's presentation, including non-attendance – unexplained and/or persistent absences
- Hint or disclosure of abuse from any person
- Concerns regarding person(s) who may pose a risk to young people (e.g. living in a household with children/young people present)

Young people can sometimes show signs or act in ways they hope adults will notice and react to.

All colleagues should be aware of this and remain vigilant.

### What colleagues should do if a young person is in danger or at risk of harm

If colleagues are concerned that a young person could be at risk of harm, they must report to the designated safeguarding lead (DSL) or deputies (DDSL) **immediately**.

If this is not possible, they should make a direct referral to children's or adult social care.

### What colleagues should do if they have a concern about honour based abuse (HBA), including FGM

If colleagues have a concern regarding a young person who might be at risk of HBA or who has suffered from HBA, they should speak to the DSL. As appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police, children, and adult's social care.

Where FGM has taken place, there has been a **mandatory reporting duty** placed on teachers since 31<sup>st</sup> October 2015. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#) particularly section 13.

### **Responding to disclosure**

Disclosures or information may be received from children, young people, parents or other members of the public. Springwater Academy recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all colleagues will handle disclosures with sensitivity.

Such information cannot remain confidential, and colleagues will immediately communicate what they have been told to the DSL.

Colleagues will not investigate but will, wherever possible, elicit enough information to pass on to the DSL in order that he can make an informed decision of what to do next.

Colleagues will:

- Listen to and take seriously any disclosure or information that a young person may be at risk of harm
- Try to ensure that the young person disclosing does not have to speak to another member of school staff
- Clarify the information
- Try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?'
- Try not to show signs of shock, horror or surprise
- Not express feelings or judgments regarding any person alleged to have harmed the young person
- Explain sensitively to the young person that they have a responsibility to refer the information to the DSL
- Reassure the young person that they will be taken seriously, supported and kept safe
- Listen to and take into account (wherever possible) the young person's wishes and feelings about the current situation as well as future plans
- Ask any necessary questions to determine the young person's wishes and feelings.
- Explain that only those who 'need to know' will be told
- Explain what will happen next and how the young person will be involved (as appropriate)
- Ensure there is appropriate support made available
- Record all information shared and actions onto CPOMS

The DSL should be used as a first point of contact for concerns and queries regarding any safeguarding concern in Springwater Academy. Any colleagues or visitors to the academy who receives a disclosure of abuse or suspects that a young person is at risk of harm must report it immediately to the DSL or, if unavailable, to the deputy. In the absence of either of the above, the matter should be brought to the attention of the most senior member available in the academy.

All concerns about a young person should be reported without delay and recorded in writing using the agreed procedures (CPOMS).

If in doubt about recording requirements, staff **must** discuss this with the DSL.

Following receipt of any information that raises concern, the DSL will consider what action to take and seek advice from children or adult's social care as required. All concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing.

It is *not* the responsibility of academy colleagues to investigate welfare concerns or determine the truth of any disclosure or allegation. All colleagues, however, have a duty to recognise concerns and pass the information on in accordance with these procedures.

All referrals will be made in line with local children and adult's social care procedures. This will be made with parent or carers consent if it does not put their child under any more risk. If it is young person over 18 consent will be sought from them if they have capacity, or from an identified appropriate advocate.

Springwater Academy adheres to child and adult protection procedures that have been agreed locally through the local safeguarding partners. Where we identify children/young people and families in need of support, we will carry out our responsibilities in accordance with local threshold guidance.

If, at any point, there is a **risk of immediate serious harm** to a young person, a referral should be made to children or adult's social care **immediately** and **if a criminal offence has been committed contact the police**. Anybody can make a referral. If the young person's situation does not appear to be improving, then the colleague with concerns should press for re-consideration by raising concerns again with the DSL and/or the Head of Academy. Concerns should always lead to help for the young person at some point.

Colleagues should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with children and adult's social care, or the police if:

- The situation is an emergency and the DSL, DDSL, Head of Academy or the Trust Safeguarding Lead are all unavailable.
- They are convinced that a direct report is the only way to ensure the young person's safety.

Any colleague, who does not feel that concerns about a young person have been responded to appropriately and in accordance with the procedures outlined in this policy, should raise their concerns with the Head of Academy, Executive Head or the CEO. If any member of staff does not feel the situation has been addressed appropriately at this point, then they should contact children or adult's social care directly with their concerns.

## **Vulnerability**

Colleagues should consider young people who may be particularly vulnerable to abuse and may require early help.

This could include:

- Any young person with additional needs including those with Special Educational Needs / Disabled children (SEND)
- Young people facing housing issues such as frequent moves and homelessness

- Those living in families with chaotic lifestyles
- Families with increased stress, parental mental ill health and/or drug and alcohol dependency
- Those young people living elsewhere, with friends, relatives, privately fostered, in care or are leaving care
- Asylum seekers / refugees
- Those vulnerable to discrimination on the basis of a protected characteristic
- Young people living in households with domestic abuse
- Young people at risk of so called 'honour'-based abuse including FGM and forced marriage
- Young people with communication difficulties
- Young people without adequate parenting / supervision which could lead to abuse, risk-related behaviour and sexual exploitation.
- Young people who identify as LGBT or questioning their gender will be provided with a safe space for them to speak out or share their concerns with familiar adults.
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.

A child/young person who is:

- A young carer
- Showing signs of being drawn into anti-social and / or criminal behaviour / involved in gangs or county lines
- Frequently missing from school / home / care home
- Misusing drugs or alcohol
- At risk of being radicalised
- Has a parent or carer in custody, or is affected by parental offending
- At risk of being exploited (criminal / sexual)
- Showing signs of neglect and abuse
- At risk of modern slavery / trafficking
- Is a privately fostered child.

This is not an exhaustive list but merely an example of vulnerabilities that colleagues must consider when identifying safeguarding concerns.

### **Young people in Alternative Provision**

Springwater Academy is responsible for the safeguarding of young people placed in Alternative Provision (AP).

This will include:

- Obtaining written confirmation that the AP has conducted appropriate safeguarding checks on all colleagues.
- Knowing the address of the AP site where the young person is being educated.
- Reviewing the AP placement at least every half-term to confirm the young person's attendance and safety.

## Early help assessment (only applies to under 18)

Colleagues will be alert to the need of supporting pupils through the early help planning processes if early help assessment and intervention is required. Early help assessment is organised early intervention to provide support as soon as a problem emerges at any point in a young person's life. If an early help assessment is appropriate, the DSL (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment, as appropriate.

Colleagues may be required to support other agencies and professionals in an early help assessment and, in some cases, where education is the fundamental factor, act as the lead practitioner.

Early help assessments should be kept under review and referred to children's social care for assessment if the child's situation does not appear to be improving or is getting worse.

## Statutory children and adult's social care assessments and services

Concerns about a young person's welfare will be referred to the local authority children or adult's social care by the DSL. **Where a young person is suffering, or is likely to suffer from harm, a referral to children or adult's social care (and if appropriate the police) will be made immediately.**

Referrals will follow the local authority referral process.

The DSL should be aware of the requirement for children/young people to have an appropriate adult while a young person is being questioned by the police. The appropriate adult will "support, advise and assist" the young person, and also "observe whether police are acting properly and fairly to respect [the young person's] rights and entitlements, and inform the officer of the rank of inspector or above if they consider that they are not". Further information can be found in the statutory guidance – PACE Code C 2023.

Where a young person in school has a Child in Need plan or a Child Protection plan, the school will liaise with children's social care, attend meetings and provide comprehensive and detailed reports.

All reports for Child in Need / Child Protection conferences will be prepared in advance, using the guidance and report template. The information contained in the report will be shared with parents before the conference as appropriate. In order to complete such reports, all relevant information will be sought from colleagues working with the young person in Springwater. All colleagues should be prepared to contribute to the report writing process.

## CHILD ON CHILD ABUSE

Children can abuse other children. This is now referred to as child on child abuse and can take many forms. It can happen both inside and outside of school online and face to face. There may also be reports where the children concerned attend two or more different schools.

Child on child abuse will not be tolerated. All colleagues will take a zero tolerance approach to any abusive behaviours and will stop and challenge inappropriate behaviours between young people, many of which may be sexual in nature. We recognise that even if there are no reported cases of child on child abuse that such abuse may still be taking place and all colleagues should be vigilant. A difficult feature of child on child abuse is that the perpetrators could be victims themselves and possibly are being abused by other family members, other adults and children/young people.

In cases where child on child abuse is identified we will follow our procedures for dealing with concerns, recognising that both the victim and perpetrator will require support.

The academy takes the following steps to minimise the risk of child on child abuse:

- Promoting an open and honest environment where young people feel safe and confident to share their concerns and worries
- Using the Relationship, Sex and Health Education and PSHE to educate and reinforce our messages through stories, role play, individual interventions, using external agencies if appropriate
- Ensuring the academy is well supervised, in all areas to support our vulnerable young people
- Ensures colleagues are aware of the indicators and signs of child on child abuse and how to identify them
- Addresses inappropriate behaviour (even if it appears to be relatively minor)
- Has clear robust policies on dealing with key issues of behaviour such as cyber bullying
- Ensures colleagues and young people are aware of the policies
- Ensures robust supervision and be aware of potential risky areas in the academy
- Increases supervision during key times
- Takes steps to prevent isolation
- Separates young people if needed
- Where risk is identified, an individual risk assessment is put in place, reviewed and updated appropriately.

The following systems are in place to enable young people to confidently report any abuse:

- All young people know who they can report to in school
- Key academy colleagues in each tutor group
- Assemblies signposting young people to key actions / people
- Posters around the academy
- Informal/formal check ins with identified young people

Each alleged incident will be recorded, investigated and dealt with on an individual basis based on the following principles:

- All information will be recorded in writing using CPOMS
- All young people involved (victim and alleged perpetrator) in Springwater Academy will be spoken to separately by the DSL
- Where the incident also involves a young person at a different establishment the DSL will ensure effective liaison and information sharing
- All young people involved (victim and alleged perpetrator) will be appropriately supported throughout the process
- The DSL will balance the young person's wishes against their duty to protect the young person and other young people
- The academy will work with our local safeguarding partners where appropriate
- The DSL may need to go against the victim's wishes and make a referral to children or adult's social care or the police. This will be handled sensitively, the reasons explained to the victim and appropriate support made available
- Parents will be informed of the incident and how their child will be dealt with and supported (unless this would put a young person at greater risk)

Victims, perpetrators and any other young people affected by child on child abuse will be supported in the following ways:

- Support will be tailored on a case-by-case basis
- All young people involved will be supported by an allocated member of our academy team
- The needs and wishes of the victim will be taken into account, along with protecting the young person.
- Wherever possible, the victim and witnesses will be able to continue their normal routine.
- The victim will never be made to feel they are the problem for making a report or made to feel ashamed for making a report
- All reasonable steps will be taken to protect the anonymity of any young people involved in any report of sexual violence or sexual harassment
- Adequate measures will be put in place to protect the young people involved and keep them safe
- A needs and risk assessment will be made, and a safety plan put in place when required which will be reviewed and adapted where necessary
- Early help assessment, children's or adult social care and other agencies will support where appropriate

Research tells us girls are more frequently identified as being abused by other young people, and girls are more likely to experience unwanted sexual touching in schools. Boys are less likely to report intimate relationship abuse. Boys report high levels of victimisation in areas where they are affected by gangs. There is an increasing evidence base emerging about the sexual exploitation of boys (both by adults and children). We recognise that both boys and girls experience child on child abuse but can do so in different ways.

We recognise that child on child abuse can manifest itself in many ways such as:

- Child Sexual Exploitation / Child Criminal Exploitation
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Physical abuse
- Radicalisation
- Abuse in intimate friendships / relationships
- Sexual violence and sexual harassment
- Gang associated and serious violence
- Initiation / hazing type violence and rituals
- Consensual and non-consensual sharing of nudes and semi-nude images and /or videos
- 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
- Upskirting (which is a criminal offence)

There are a number of factors that make young people more vulnerable to 'child on child' abuse:

- Experience of abuse within their family
- Living with domestic violence
- Young people in care
- Young people who go missing
- Young people with additional needs (SEN and/or disabilities)

Some of the reasons why children abuse other children:

- The child may have been emotionally, physically, or sexually abused themselves
- The child may have witnessed physical or emotional abuse
- The child may have viewed sexually explicit / violent movies, video games or other materials

- The child may have just acted impulsively without meaning to harm anyone

Relationship abuse is unacceptable behaviour between any two people.

## CONSENSUAL AND NON-CONSENSUAL SHARING OF NUDE AND SEMI-NUDE IMAGES AND/OR VIDEOS

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams by children/young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner.

Incidents may also occur where:

- Young people find nudes and semi-nudes online and share them claiming to be from another young person
- Young people digitally manipulate an image of a child/young person into an existing nude online
- Images created or shared are used to abuse other children/young people e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

Nude or semi-nude images, videos or live streams may include more than one child/young person. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children/young people complex. There are also a range of risks which need careful management from those working in education settings.

Many professionals may refer to 'nudes and semi-nudes' as:

- Youth produced sexual imagery or 'youth involved' sexual imagery indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children under the age of 18.
- 'Sexting'. Many adults may use this term, however some children/young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images.
- Image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes.

### Initial response

When an incident involving nudes and semi-nudes comes to the attention of any Springwater colleague:

- Confiscate the phone and switch it to 'flight mode' – if possible.

- The incident should be referred to the DSL (or deputy) as soon as possible.
- The DSL will hold an initial review meeting with the appropriate colleague. This may include the colleague/s who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- There will be subsequent interviews with the young person involved (if appropriate).
- Parents and carers will be informed at an early stage and involved in the process in order to best support the young person unless there is good reason to believe that involving them would put the young person at risk of harm.
- A referral will be made to children or adult's social care and/or the police immediately if there is a concern that a young person has been harmed or is at risk of immediate harm at any point in the process.

A disclosure may not be a single event and the young person may share further information at a later stage.

Any direct disclosure by a young person should be taken seriously. A young person who discloses they are the subject of an incident of sharing nudes and semi-nudes is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort, and they may have already tried to resolve the issue themselves.

### **Initial review meeting**

The initial review meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to any young person
- If a referral should be made to the police and/or children or adult'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 as 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 young people involved which would influence risk assessment
- If there is a need to contact another education, setting or individual
- Whether to contact parents or carers of the young people involved - in most cases they should be involved

An immediate referral to police and/or children or adult's social care through the MASH (multi-agency safeguarding hub) or equivalent will be made if at this initial stage:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- What you know 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 images involve sexual acts and any young person in the images or videos is under 13.
- You have reason to believe a young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

The DSL should be aware of the requirement for children to have an appropriate adult while a child is being questioned by the police. The appropriate adult will “support, advise and assist” the child, and also “observe whether police are acting properly and fairly to respect [the child’s] rights and entitlements, and inform the officer of the rank of inspector or above if they consider that they are not”. Further information can be found in the statutory guidance – PACE Code C 2023.

If none of the above apply, the DSL may decide to respond to the incident without involving the police or children or adult’s social care. They can still choose to escalate the incident at any time if further information/concerns are disclosed at a later date.

The decision to respond to the incident without involving the police or children or adult’s social care will only be made in cases where the DSL is confident that they have enough information to assess the risks to any young person involved and the risks can be managed within the academy’s support and disciplinary framework and, if appropriate, their local network of support.

### **Assessing the risks**

The circumstances of incidents can vary widely. If at the initial review stage, a decision has been made not to refer to police and/or children or adult’s social care, the DSL (or equivalent) should conduct a further review (including an interview with any young person involved) to establish the facts and assess the risks.

When assessing the risks and determining whether a referral is needed, the following should be also considered:

- Why was the nude or semi-nude shared? Was it consensual or was the young person put under pressure or coerced?
- Has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the young person who produced the image?
- Has the nude or semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
- How old are any of the young people involved?
- Did the young person send the nude or semi-nude to more than one person?
- Do you have any concerns about the young person’s vulnerability?
- Are there additional concerns if the parents or carers are informed?

The DSL will decide whether a young person is at risk of harm, in which case a referral will be appropriate, whether additional information or support is needed from other agencies or whether the education setting can manage the incident and support any young person directly. The DSL will always use their professional judgement in conjunction with that of their colleagues to assess incidents.

### **Supporting the young person involved**

The DSL or another Springwater Academy colleague (who the young person feels more comfortable talking to) will discuss future actions and support with the young person. This discussion will take into account the views of the young person as well as balancing what are considered to be appropriate actions for responding to the incident

The purpose of the discussion is to:

- Identify, **without viewing wherever possible**, what the image contains and whether anyone else has been involved.

- Find out whether the image has been shared between two people or shared further. This may be speculative information as images or videos may have been shared more widely than the young person is aware of.
- Discuss what actions and support might be needed, including preventing further distribution.

When discussing the sharing of nudes and semi-nudes, the DSL/academy colleague will:

- Reassure the young person that they are not alone, and the academy will do everything that they can to help and support them. They should also be reassured that they will be kept informed throughout the process.
- Recognise the pressures that young people can be under to take part in sharing an image and, if relevant, support their parents and carers to understand the wider issues and motivations around this.
- Remain solution-focused and avoid any victim-blaming questions such as 'why have you done this?' as this may prevent the young person from talking about what has happened. For example, they will use questions such as 'describe what happened' or 'explain to me who was involved'.
- Help the young person to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the image(s).
- Discuss issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL or equivalent if this ever happens.
- Explain the law on the sharing of nudes and semi-nudes. It is important to highlight that the law is in place to protect children and young people rather than criminalise them and should be explained in such a way that avoids alarming or distressing them
- Signpost to the IWF (Internet Watch Foundation) and [Childline's Report Remove tool](#). Report Remove helps children and young people to report an image shared online, to see if it is possible to get the image removed. This must be done as soon as possible in order to minimise the number of people that have seen the picture.

### **Informing parents and carers**

Parents or carers will be informed and involved in the process at an early stage unless informing them will put a child or young person at risk of harm. Any decision not to inform the parents or carers will be made in conjunction with other services such as children or adult's social care and/or the police, who would take the lead in deciding when they should be informed.

### **Supporting parents and carers**

Young people can be involved in an incident in several different ways. They may lose control of their own image, receive an image of someone else or share an image of another person. In any of these situations, parents and carers may find it difficult to know how to deal with the knowledge that their child has been involved in an incident and may display differing emotions.

Whatever their feelings, it is important that we listen to their concerns and take them seriously. We will also help to reassure parents and carers by explaining that it is normal for young people to be curious about sex.

In all situations, parents or carers will be:

- Given information about the sharing of nudes and semi-nudes, what they can expect to happen next, and who will be their link person within the school.

- Given support to deal with their own feelings of upset and concern including signposting to further resources that can help them to understand the sharing of nudes and semi-nudes or support services they can contact, where appropriate.
- Given support on how to speak to their child about the incident.
- Advised on the law around the sharing of nudes and semi-nudes.
- Kept updated about any actions that have been taken or any support that their child is accessing, unless the young person involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision.
- Informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened. This could include speaking to a Childline counsellor [online](#) or on 0800 11 11, in house counselling services where available, or a GP. If they are concerned that their child is suicidal, they should contact 999.
- Directed to [NCA-CEOP](#) if the child discloses any further details to them that may suggest they are being groomed or sexually exploited.

### **Searching devices, viewing and deleting nudes and semi nudes**

Colleagues and parents or carers must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so as outlined below.

Wherever possible, responses to incidents will be based on what DSLs have been told about the content of the imagery.

The decision to view any imagery will be based on the professional judgement of the DSL. Imagery will never be viewed if the act of viewing will cause significant distress or harm to any young person involved.

If a decision is made to view imagery, the DSL would need to be satisfied that viewing is:

- The only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any young person involved.
- Necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the young person or parent or carer in making a report.

Unavoidable because a young person has presented it directly to a Springwater colleague or nudes or semi-nudes have been found on an education setting's device or network.

If it is necessary to view the imagery, then the DSL will:

- Never copy, print, share, store or save them; this is illegal. If this has already happened, we will contact the local police for advice and to explain the circumstances.
- Discuss the decision with the head of academy or the Trust Safeguarding Lead.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the head of academy or the Trust Safeguarding Lead.
- Ensure viewing takes place with another member of staff present in the room, ideally the head of academy or the Trust Safeguarding Lead. This colleague does not need to view the images.
- Wherever possible, make sure viewing takes place on the academy premises, ideally in the head of academy office.
- Ensure wherever possible that they are viewed by a colleague of the same sex as the young person in the images.
- Record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. This will be signed and dated.

- If any devices need to be taken and passed onto the police, the device(s) will be confiscated and the police will be called. The device will be disconnected from Wi-Fi and data, and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device will be placed in a secure place, in a locked cupboard until the police are able to come and collect it.

If nudes or semi-nudes have been viewed by a Springwater colleague, either following a disclosure from a young person or as a result of an academy colleague undertaking their daily role (such as IT team monitoring school systems), the DSL will make sure that the colleague is provided with appropriate support. Viewing nudes and semi-nudes can be distressing for both young people and adults and appropriate emotional support may be required.

In most cases, children and young people will be asked to delete the imagery and to confirm that they have deleted them. They will be given a deadline for deletion across all devices, online storage or social media sites. They will be reminded that possession of nudes and semi-nudes is illegal. They will be informed that if they refuse or it is later discovered they did not delete the imagery, they are continuing to commit a criminal offence, and the police may become involved.

All incidents relating to nudes and semi-nudes being shared will be recorded using the academy's procedures. Copies of imagery should not be taken or stored.

It is important that young people understand the academy's policy towards nudes and semi-nudes. The content of this policy and the protocols the school will follow in the event of an incident will be explored as part of teaching and learning. This will reinforce the inappropriate nature of abusive behaviours and reassure young people that the academy will support them if they experience difficulties or have concerns.

**For more information:** [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)

## CYBERCRIME

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

Cyber-dependent crimes include:

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

Young people with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a young person in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to call the police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

## CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES OR CERTAIN HEALTH ISSUES

Young people with Special Educational Needs or Disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Young people with SEND are significantly more likely to be abused than their peers.

Additional barriers can sometimes exist when recognising abuse in SEND young people. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration
- These young people being more prone to peer group isolation or bullying (including prejudice-based bullying) than other young people
- The potential for young people with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs
- Communication barriers and difficulties overcoming these barriers

Springwater colleagues will support these young people in expressing any concerns they may have and will be particularly vigilant to any signs or symptoms of abuse. The DSL and SENDCO will work together when dealing with reports of abuse involving young people with SEND.

## MENTAL HEALTH CONCERNS

All colleagues should be aware that mental health problems can, in some cases, be an indicator that a young person or adult has suffered or is at risk of suffering abuse, neglect or exploitation.

If colleagues have a mental health concern about a young person or adult that is also a safeguarding concern, immediate action should be taken, following our safeguarding and child protection policy, colleagues **MUST** speak to the designated safeguarding lead or a deputy.

We will ensure that our colleagues understand the support they can provide to young people who may be experiencing mental health concerns, and we will ensure that colleagues follow the following principles as set out in 'Mental Health and Behaviour in Schools 2018'. We recognise that early intervention to identify issues and provide effective support is crucial. The academy role in supporting and promoting mental health and wellbeing can be summarised as:

**Prevention:** we will seek to create a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping young people to be resilient so that they can manage the normal stress of life effectively. This will include teaching young people about mental wellbeing through the curriculum and reinforcing this teaching through academy activities and ethos:

- **Identification:** we will support colleagues and young people to recognise emerging issues as early and accurately as possible.
- **Early support:** we will support and help young people to access evidence based early support and interventions wherever possible and seek access to specialist support for those who require such interventions.

We aim to work in partnership with young people, parents / carers and establish effective relationships with external agencies to provide swift access or referrals to specialist support and treatment.

## CONTEXTUAL SAFEGUARDING

Safeguarding incidents and/or behaviours can be associated with factors outside of the academy and/or can occur between young people outside the academy. All colleagues should be considering the context within such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Geographical factors	Schools Response
<ul style="list-style-type: none"> <li>• Close proximity to the trainline</li> <li>• Close proximity to main roads</li> </ul>	<ul style="list-style-type: none"> <li>• Trainline safety is taught in line with curriculum delivery and as part of accessing the local community</li> <li>• Road and highway safety taught in line with curriculum delivery and as part of accessing the local community</li> <li>• Colleagues monitor and support safe travel arrangements for young people who use school transport or travel independently.</li> </ul>

<ul style="list-style-type: none"> <li>• Many of Springwater’s young people travel from outside the local vicinity</li> </ul>	<ul style="list-style-type: none"> <li>• Springwater is a multi-site academy, with our sixth form cohort being across a main road. In line with our curriculum, we deliver lessons and review safety plans for young people who travel freely between alternate sites.</li> <li>• We work closely with our transport networks to support our young people with this extended traveling time. This includes ensuring escorts and drivers receive safeguarding and medical training to support to keep our young people safe.</li> </ul>
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Social and economic factors	Schools Response
<ul style="list-style-type: none"> <li>• Family dynamics and pressure</li> <li>• County Lines / Criminal Exploitation. National Crime Agency tracker shows they are 9 known county lines currently operating in North Yorkshire.</li> </ul>	<ul style="list-style-type: none"> <li>• Springwater provides and promotes access to external support networks such as Early Help, attends and contributes towards Child in Need and Child protection plans</li> <li>• Springwater acts as a source of Early Help, offering food parcels and clothing donations to families</li> <li>• Safeguarding Lead attends Harrogate and Selby MACE (Multi-Agency Child Exploitation and Contextual Safeguarding) monthly and receives updates for geographical areas of concern, people of notable concern and trends and patterns for the local areas.</li> <li>• Information shared through MACE meetings has been included in colleague briefings when informing colleagues of nearby areas of concern to local police, including shops that are known to sell alcohol and vapes to underage young people</li> </ul>
Peer Group factors	Schools Response
<ul style="list-style-type: none"> <li>• Colleague training on Contextual risks for our young people</li> <li>• 46.2% of young people in our academy have a diagnosis of Autism. Transitions and change can be disruptive for our young people</li> <li>• Due the needs and vulnerabilities of our young people they are susceptible to being influenced</li> </ul>	<ul style="list-style-type: none"> <li>• Regular CPD (continuing professional development) for colleagues on issues like peer-on-peer abuse, online grooming and child criminal or sexual exploitation – focused on how these might look different for young people with communication difficulties or learning disabilities</li> <li>• The academy supports young people to join Springwater by having transition days to meet colleagues they will be working with to begin building trusting relationships.</li> <li>• Transition days for young people leaving Springwater, providing social stories, inviting key colleagues in to speak to pupils about the transition to help better prepare them.</li> <li>• All students enrolled at Springwater have SEN and EHCP plans, with ASD, ADHD, social pragmatic communication disorder and intellectual disabilities being prevalent throughout our young people</li> <li>• Provide targeted PSHE lessons about positive peer influence and consent, safe relationships and healthy friendship dynamics</li> <li>• Use of social stories and visual aids to teach about saying “no” and recognising peer pressure</li> <li>• Regularly review peer group dynamics in pastoral and safeguarding meetings</li> </ul>

<p>by siblings and peers</p> <ul style="list-style-type: none"> <li>Higher risk of social exclusion and isolation for young people with SEND</li> <li>Harmful Sexual Behaviours is one of the most reported categories of concern recorded on CPOMS</li> <li>Our young people have a wide range of needs and understanding around social situations.</li> </ul>	<ul style="list-style-type: none"> <li>Use of key adults and peer mentors to help facilitate inclusion</li> <li>Organising peer appropriate activities and sessions to help build friendships</li> <li>The function of behaviour is generally either a sensory need, a lack of understanding around public/private behaviours, or impulsivity.</li> <li>Risk Assessment Management Plans (RAMPS) are implemented (and reviewed) following any incident.</li> <li>SEN Team discuss concerns weekly in meetings and the MDT explore the strategies and therapeutic interventions required to support the young person and others to stay safe.</li> <li>Pastoral Plans are regularly reviewed and updated and capture any known behaviours and the strategies in place to best support the young person</li> <li>HSB training has been delivered to all colleagues</li> <li>The needs of our young people is considered when grouping classes. Small group/ one to one intervention. Liaising with external specialist services. Colleague training for HSB with robust recording, monitoring and risk assessment processes in place.</li> </ul>
Home factors	Schools Response
<ul style="list-style-type: none"> <li>Family relationships and dynamics, with additional pressures on families who have a child with SEND</li> <li>Our 6<sup>th</sup> form cohort accounts to 33% of our academy's population. Many of our young people have access to their own mobile phone.</li> <li>Large proportion of our young</li> </ul>	<ul style="list-style-type: none"> <li>The academy provides parent workshops on topics including online safety, emotional regulation, and understanding autism/ADHD</li> <li>Provide and offer visual guides, simplified communication and translated materials for parents with learning difficulties or language barriers</li> <li>The academy provides safe spaces and trusted adults for young people to talk about home worries and any stress they may have from home</li> <li>The academy works closely with social care and domestic abuse services like Operation Encompass to support both families and young people</li> <li>School support siblings if they are attending the same school or nearby schools through consistent communication between colleagues</li> <li>School organises and provides education and promotion of online and offline safety. This involves teaching embedded into the curriculum by raising awareness about online risks and safe practices among young people, parents and colleagues</li> <li>School will respond to inappropriate languages and behaviour consistently, ensuring clear responses to unacceptable actions by all member of the school community</li> <li>Communication focussed curriculum to support/develop young people in identifying and communicating any worries they may have. Total communication approach is used, and colleagues</li> </ul>

people are pre-verbal.	observed, recorded and monitor day-to-day presentation. Young people identified as vulnerable are discussed at weekly meetings.
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## RECORDING, RECORD KEEPING AND INFORMATION SHARING

**All** concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing on the CPOMS system.

Each record should include:

- A clear and comprehensive summary of the concern
- A list of any actions taken immediately in response to the incident or concern
- Details of how the concern was followed up and resolved
- A note of each action taken, decisions reached and the outcome, including the rationale for the decision
- Information from a young person written verbatim
- Date and signature / record of who completed the record

If there is any doubt about recording requirements, Springwater colleagues should discuss them with the DSL.

**All** concerns should be passed to the DSL **without delay**, either written or verbal (followed as soon as possible by a written report)

Child Protection information will be recorded and stored on . Springwater with the support of the Trust IT team will ensure that Child Protection information is secure and can only be accessed and viewed by those permitted to. Only Child Protection information will be kept in the file and this file will be kept up to date. Records of concern, copies of referrals, invitations to Child Protection conferences, core groups and reports will be stored here. All Child Protection files will include; a chronology, a contents front cover and will record significant events in the young person's life.

Child Protection files will be the responsibility of the DSL. Child Protection information will only be shared with relevant staff / agencies on a 'need to know' basis, in the child's interests and on the understanding that it remains strictly confidential.

When a young person leaves our academy, the DSL will make contact with the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school in an agreed secure manner. This should be as soon as possible and within 5 days for an in-year transfer or within the first 5 days at the start of a new term to allow a school or college to have support in place for when a young person arrives. We will retain evidence to demonstrate we have acted accordingly when dealing with safeguarding matters and how the file has been transferred; this may be in the form of electronic records via CPOMS audit features or a written confirmation of receipt from the receiving school and/or evidence of recorded delivery. Where a parent elects to remove their child from the school roll to home educate, the academy will make arrangements to pass any safeguarding concerns to the Local Authority. Where child protection files are electronic the DSL will speak with the DSL of the receiving school and ensure they are aware of the protection concerns.

**Transfer of Safeguarding Files to Further Education Provider** (Sharing Information when a young person is over 18)

When a young person turns 18, the statutory guidelines for the transfer of safeguarding information, as set out in Sections 115 to 123 of [Keeping children safe in education 2025](#) no longer applies.

Ascent Academies Trust/Springwater Academy recognises its responsibilities under the Care Act 2014 and associated [Care and support statutory guidance](#), and given the authority vested in the Trust by the statutory guidance, has a lawful basis under Articles 6(e) and 9(2)(g) of the General Data Protection Regulation (GDPR) to share and transfer safeguarding information when required to do so.

Springwater Academy will ensure that all data transfers are undertaken in a manner that ensures the security, confidentiality and integrity of the young person's personal data, using appropriate technical or organisational measures.

Under Article 21 of the GDPR, all individuals to whom the information relates have the right to raise an objection to their information being shared, based on their individual circumstances. Objections should be raised by contacting the Designated Safeguarding Lead (James Marks) prior to any change in education placement, or by contacting the Trust's Data Protection Officer via [data.protection@sunderland.gov.uk](mailto:data.protection@sunderland.gov.uk)

## PROCEDURES FOR DEALING WITH CONCERNS ABOUT COLLEAGUES

**What colleagues should do if they have safeguarding concerns about another Springwater colleague.**

If colleagues have safeguarding concerns or an allegation of abuse is made about another colleague (including supply colleagues, volunteers and contractors) posing a risk of harm to young people this must be reported to the head of academy, including any low level concerns. Where there are concerns about the head of academy this should be referred to the CEO or Executive Head.

**What colleagues should do if they have concerns about safeguarding practices within the academy**

The academy will maintain a safeguarding culture which encourages all colleagues and volunteers to feel able to raise concerns. Where colleagues have concerns about poor or unsafe practice and potential failures in the academy's safeguarding systems, these should be raised following the academy's confidential reporting policy (whistleblowing policy).

Where a staff member feels unable to raise an issue with the academy, or feels their genuine concerns are not being addressed, other whistleblowing channels are available, such as the NSPCC whistleblowing advice line. Contact details are on the Key External Contacts page.

**For further information please refer to the Policy for dealing with allegation made against colleagues in relation to abuse, also includes low-level concerns.**

## SAFER WORKING PRACTICE

All Springwater colleagues have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of young people. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work.

All colleagues will be provided with a copy of our school's Code of Conduct at induction which sets out the academy's expectations of colleague's behaviour. We will review our Code of Conduct regularly and ask colleagues to ensure that they are familiar with the current version. Colleagues are expected to carry out their duties in accordance with the Code of Conduct.

There will be occasions when some form of physical contact is inevitable, for example if a young person has an accident or is hurt or is in a situation of danger to themselves or others around them. However, at all times the agreed policy for positive handling must be adhered to.

If colleagues, visitors, volunteers or parent helpers are working with young people alone they must ensure they are visible to other colleagues. They will be expected to inform another colleague of their whereabouts in the academy, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.

All colleagues are responsible for their own actions and behaviour and should avoid any conduct in school and outside of school, online and offline, which would lead any reasonable person to question their motivation and intentions.

Further advice can be found in 'Guidance for safer working practices for adults who work with children and young people in education settings' (2022)

All colleagues and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

## SAFER RECRUITMENT

We will ensure that the CEO, allocated Trustees, head of academy, and any interview panel leads will have completed appropriate safer recruitment training. At all times the interview panel lead and the Trustee board will ensure that safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'*, DfE.

The academy will follow the recruitment and selection procedures when making decisions about the suitability of prospective employees. This will include: conducting the relevant checks, the Trust may also carry out an online search as part of due diligence on shortlisted candidates this may help identify any incidents or issues that have happened, and are publicly available online, which the Trust might want to explore with the applicant at interview obtaining appropriate references and information from interviews.

Where colleagues work in EYFS or wraparound care for children under the age of 8 we will ensure the appropriate checks are carried out to ensure that individuals are not disqualified under the Children Disqualification Regulations 2018.

We will maintain a Single Central Record of all safer recruitment checks carried out in line with statutory requirements. This will include all colleagues, governors or volunteers who work in regulated activity and any other third parties such as sports coaches etc.

We will continue to be vigilant in the academy and across the Trust encouraging colleagues to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of young people.

### Visitors

Springwater Academy has clear protocols for visitors to ensure they are suitable and supervised as appropriate.

All visitors will be expected to confirm they have an appropriate DBS and will be asked to show photo ID on arrival. The academy will keep a record of all visitors.

Visitors will be expected to understand that the academy promotes British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and that they will need to uphold these during their visit.

For some visits, the academy will request a copy of the material to be used to assess its content and relevance to the age group.

If during the visit the supervising colleague deems the content to be inappropriate, they will stop the visitor and discuss an alternative approach.

During the visit, visitors will be supervised by a Springwater colleagues. Where the visitor will be working on a one-to-one basis with a young person, specific safeguarding arrangements will be put in place.

**For further information see the Safer Recruitment Policy.**

### The Trustee Board

The Trustee Board is accountable for ensuring the effectiveness of this policy and our compliance with it. Although our Trustee Board takes collective responsibility to safeguard and promote the welfare of our young people, we also have a named Trustee who champions safeguarding within Springwater and the Trust.

Trustee boards and proprietors will ensure that all Trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in Springwater and the Trust are effective. The training will be regularly updated.

The Trustee Board will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our Trust/academy website and has been written in line with local authority guidance and the requirements of the local safeguarding partners' policies and procedures.
- Springwater Academy contributes to inter-agency working in line with Working Together to Safeguard Children (2023).
- Springwater Academy is compliant with online safety legislation by regularly reviewing the effectiveness of the Trust filters and monitoring systems. They ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- They uphold the obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements. Including, not unlawfully discriminating against young people because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
- A senior colleague from the leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is a deputy DSL(s) who is appropriately trained to deal with any issues in the absence of the DSL. There will always be cover for this role.
- All colleagues receive a safeguarding induction and are provided with a copy of this policy and the code of conduct policy.
- All colleagues undertake appropriate child protection training that is updated regularly, at least annually.
- Procedures are in place for dealing with allegations against colleagues, volunteers and contractors, in line with statutory guidance.
- Safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'* DfE.
- Trustees remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.
- Appropriate arrangements are in place to keep young people safe when organisations or individuals rent or hire Springwater facilities/premises. Safeguarding requirements will be included in any hire or lease agreement as a condition of use of the premises.

The Trustee Board will receive regular safeguarding reports, presented at the full board meetings that will detail the training that has taken place and will inform the Trustee Board how Springwater and the Trust meets its statutory requirements.

The Trustee Board will undertake a range of safeguarding visits over the year to monitor safeguarding compliance.

**The head of academy is responsible for:**

- Identifying a senior colleague from Springwater Academy to be the designated safeguarding lead (DSL).
- Identifying colleagues to act as the DSL in his absence to ensure there is always cover for the role.
- Ensuring that the policies and procedures adopted by the Trustee board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all colleagues.
- Ensuring that all colleagues and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures.
- Liaise with the local authority designated officer (LADO) in the event of an allegation of abuse being made against a member of staff.

**The virtual school headteacher**

- Guidance has been updated to reflect the extension of the role of the virtual school head to include a non-statutory responsibility for oversight of the attendance, attainment, and progress of children with a social worker and those with kinship care arrangements.
- Virtual school heads should identify and engage with key professionals to help them understand the role they have in improving outcomes for children.

**The designated safeguarding lead (DSL)**

The DSL is a senior member of Springwater Academy, who has the appropriate status and authority to take lead responsibility for safeguarding and child and adult protection within our school. The DSL will carry out their role in accordance with the responsibilities outlined in Annex C of *'Keeping Children Safe in Education'* DfE.

The DSL will provide advice and support to other colleagues on young people's welfare and protection matters. Any concern for a young person's safety or welfare will be recorded in on CPOMS which will alert the DSL and any other relevant colleagues.

During term time the DSL and / or a deputy will always be available (during academy hours) for colleagues in the academy to discuss any safeguarding concerns. If in *exceptional* circumstances, a DSL is not available on Springwater site in person, we will ensure that they are available via telephone and any other relevant media.

In the event that the Lead or Deputies cannot be contacted, please seek advice from the Trust Safeguarding Lead.

The DSL will manage referrals and will refer cases of suspected abuse to children's or adult social care and refer cases to the Channel programme if there is a radicalisation concern.

The DSL will liaise with the three safeguarding partners and other agencies where necessary. Through regular training, knowledge and experience the DSL will be equipped to attend and contribute to child protection case conferences, strategy discussions and other interagency meetings.

The DSL will maintain detailed, accurate written records and child protection files ensuring that they are kept confidential and stored securely.

When young people leave Springwater Academy, the DSL will ensure child protection records are transferred separately from the main young person's file, ensuring secure transit and a confirmation of receipt will be obtained. This should be as soon as possible and within 5 days for an in-year transfer or within the first 5 days at the start of a new term to allow a school or colleague to have support in place for when a young person arrives. Where child protection files are electronic the DSL will speak with the DSL of the receiving school and ensure they are aware of the protection concerns.

As part of the recruitment process the HR team will ensure that all relevant safeguarding and child protection policies are shared with any newly appointed colleagues.

The DSL is responsible for ensuring that all colleagues and volunteers have read and understood the academy's safeguarding policy and the procedures they need to follow. They will ensure that all colleagues, volunteers and regular visitors have received appropriate child protection training during induction.

The DSL will help promote educational outcomes by sharing information about the issues that young people, including those with a social worker, are experiencing, or have experienced, with relevant colleagues and leadership staff. They will also promote supportive engagement with parents and/or carers promoting the welfare of young people.

The DSL will liaise with the Senior Mental Health Lead and the relevant colleagues within this team to share and support with any safeguarding concerns that are linked to mental health.

The DSL will also liaise with Springwater's Behaviour Support Manager to ensure a whole academy policy about managing behaviour and discipline including the use of reasonable force, is in place, to ensure a good and safe educational environment for all young people.

This will also include ensuring the effective implementation of the policy against bullying/cyber-bullying, prejudiced-based and discriminatory bullying inclusive of measures to prevent all forms of bullying among pupils, is in place, as a stand-alone policy but also covered in the Behaviour and Discipline Policy.

### **Opportunities to teach safeguarding**

We will teach young people how to keep themselves safe, including in relation to contextual factors.

Preventive education is most effective in the context of a whole-school or college approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. This will be underpinned by our behaviour policy and pastoral system, as well as by a planned programme of evidence-based RSHE/RE delivered and reinforced throughout the whole curriculum.

**Springwater Academy strives to support all its young people through a clear set of values and standards upheld and demonstrated throughout all aspects of school life:**

- The curriculum to encourage self-esteem, self-motivation, self-protection.
- The Academy ethos, which promotes a positive, supportive and secure environment and which gives all young people a sense of being respected and valued.
- Approaches which allow young people to develop critical thinking, literacy skills and digital literacy skills.
- A curriculum that provides preventative education which explores human rights, equality, democracy and tolerance and prepares young people fully for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- A curriculum which explores human rights, equality, democracy and tolerance and prepares young people fully for life in modern Britain.
- A curriculum where young people develop personal resilience, understand and can take appropriate risks or have personal strategies/safety plans that allow them to manage their own safety both on and off line. This can include topics covered as part of Relationships and Sex Education as well as Fundamental British Values and the SMSC Curriculum which cover harm, abuse, positive and healthy relationships and crime. Such a curriculum will be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of those young people with SEND and other vulnerabilities) and will include; healthy and respectful relationships; boundaries and consent; stereo typing, 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 Abuse such as Forced Marriage and Female Genital Mutilation (FGM) and how to access support and; what constitutes sexual harassment and sexual violence and why these are always unacceptable.
- A whole academy approach to online safety that considers the four areas of risk: Content; being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-semitism, radicalisation and extremism. Contact; being subjected to harmful online interaction with other users; for example child to child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial and other purposes. Conduct; personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images and videos/ AI, deepfakes and toxic influences (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying). Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

All education settings can refer to the Education for a connected world framework (<https://www.gov.uk/government/publications/education-for-a-connected-world>) for age-specific advice on teaching about taking and sharing inappropriate images, including nudes and semi-nudes.

## TRAINING AND INDUCTION

All new members colleagues or volunteers will be informed of safeguarding procedures, including the recording and reporting procedures as part of the induction process.

They will receive safeguarding training within the first half term of joining Springwater Academy. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a young person, how to record concerns and the role of the designated safeguarding lead (DSL). The training will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with young people.

All colleagues will receive online safety training and relevant colleagues have an awareness and understanding of the provisions in place for filtering and monitoring. They will know how to escalate concerns.

In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist colleagues to understand and discharge their role and responsibilities as set out in Part one of '*Keeping Children Safe in Education*' DfE.

In order to achieve this, we will ensure that:

- All colleagues will undertake appropriate safeguarding training on an annual basis, including online safety.
- We will evaluate the impact of this training.
- All colleagues will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, briefings and meetings), as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard young people effectively.

All regular visitors, temporary colleagues and volunteers to Springwater Academy will be given a set of our safeguarding procedures; they will be informed of who the DSL and deputies are and what the recording and reporting system is.

The DSL and all the deputies who may be in a position of making referrals or attending child protection conferences or core groups will attend appropriate training. In addition to formal training, the DSL will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role.

The Trustee Board will ensure that **all** trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures are effective and support a robust Trust and academy approach to safeguarding. The training will be regularly updated.

We actively encourage all our colleagues to keep up to date with the most recent local and national safeguarding advice and guidance, Annex B of '*Keeping Children Safe in Education*' provides links to guidance on specific safeguarding issues. In addition, throughout the academic year we will brief colleagues on key issues identified by the academy and/or the Trust.

All colleagues are expected to read these key documents and fully **understand** their responsibility to keep children safe:

- Part One and Annex B of '*Keeping Children Safe in Education*' DfE

- Safeguarding and Young People Protection Policy
- Behaviour Policy
- Code of Conduct
- Allegations against colleagues (Whistleblowing policy)
- Safeguarding responses to children who go missing from education
- Role of the designated safeguarding lead (including the identity of the DSL and any deputies)

## WORKING WITH PARENTS AND CARERS

Springwater Academy is committed to working in partnership with parents/carers to safeguard and promote the welfare of young people and to support them to understand our statutory responsibilities in this area.

When young people join our academy, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the Trust/academy website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to children or adult's social care.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a young person from harm.

We will seek to share with parents any concerns we may have about their child *unless* to do so may place a young person at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a young person will not prevent the DSL making a referral to children or adult's social care in those circumstances where it is appropriate to do so.

In order to keep young people safe and provide appropriate care for them, the academy requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the young person normally lives
- Full names and contact details of all persons with parental responsibility (if different from above)
- Emergency contact details (if different from above); wherever possible Springwater Academy will hold more than one emergency contact for each young person
- Full details of any other adult authorised by the parent to collect the young person from school (if different from the above)

Springwater Academy will retain this information on the young person's file. Springwater Academy will only share information about young people with adults who have parental responsibility for a young person or where a parent has given permission and the academy has been supplied with the adult's full details in writing.

If in any doubt about information sharing, colleagues should speak to the DSL (or deputy). 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 young people.

- We will build a partnership approach to online safety and will support parents/carers to become aware of and alert to the potential online benefits and risks for young people by:

- Providing information on our academy website and through existing communication channels, such as Facebook, newsletters, fliers, offering specific online safety guidance and support for parents/carers.
- Sharing which filtering and monitoring systems are in place with parents/carers and young people.
- Sharing what you are asking young people to do online, though the curriculum including which sites they might access.

## RELEVANT POLICIES

To underpin the values and ethos of Springwater Academy and our intent to ensure that all young people at Springwater Academy are appropriately safeguarded the following policies and procedures are also included under our safeguarding umbrella:

- **School Recruitment and Selection policy** inclusive of safer recruitment guidance and regulation, for example the **single central record** which demonstrates the pre-employment vetting checks for all staff (e.g. identity, professional qualifications, right to work in the UK, and further checks on people who have lived or worked outside the UK including recording checks for those EEA teacher sanctions and restrictions), for the workforce who are in regulatory activity (enhanced DBS [excluding associate members], children's/adult barred list, prohibition from teaching check, section 128 check for management positions and trustees) and supervision of those who don't meet this requirement.
- **Clear recruitment procedures** which embed keeping young people safe across every aspect from vacancy to conditional appointments, induction and an on-going safeguarding culture of vigilance.
- **Trained panel members** who ensure that the policy works in practice in all recruitment and selection within the Academy.
- **School Staffing (England) Regulations 2009, Regulation 9:** require Trustees of maintained schools to ensure at least one member of a recruitment panel must undertake safer recruitment training to satisfy all requirements in the statutory guidance Keeping Children Safe in Education 2025 and Working Together 2023. At Springwater Academy we share this commitment.
- **EPM Human Resources manual** and guidance.
- **Ascent Colleague Code of Conduct** - inclusive of 'Low Level' Concerns Policy, allegations against colleagues, Whistleblowing, and Safer Recruitment Consortium Guidance for Safer Working Practices for those working with Young People in education settings. The Academy will ensure that all colleagues and volunteers are aware of the need for maintaining appropriate and professional boundaries in their relationships with young people and agree to work within all policies and procedures to safeguard both children and adults.
- The Academy will ensure that colleagues and volunteers are aware that sexual relationships with young people aged under 18 are unlawful and could result in legal proceedings being taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).

- **Behaviour & Discipline Policy** – inclusive of the Use of Reasonable Force/positive handling and confiscating and searching.
- **Anti-bullying Policy/Cyber/Online bullying**
- **Guidance on Harmful Sexual Behaviour**
- **Remote/Home learning Policy** inclusive of all expectations for young people learning at home.
- **Record-Keeping Policy** inclusive of all procedures around the recording, storing and transferring of information regarding young people
- **Inclusion & Special Education Needs Policy.**
- **The Academy's educational visits/off site policy** (reviewed annually) reflects the consideration we give to the safeguarding of our young people both within the Academy environment and when away from the Academy when undertaking trips, visits or pupils being creatively educated.
- **Child-on-Child Guidance (see Annex A attached).**
- **Mental Health and Wellbeing Policy/Process/Plan**
- **Photographic & digital imagery policy** with parental consent forms annually signed.
- **Administration of medicines policy and procedures** with trained colleagues who manage this.
- **Young people with medical needs policy** and implications for your workforce, young people and partnership with parents.
- **Attendance Management Policy-** management of attendance and the partnership with the Local Authority in reporting young people missing from education and those deleted from the Academy's admission register. This includes the need for two emergency contact details for every young person, where possible.
- **Missing Children Policy** – inclusive of runaways, missing and children missing from education, ensuring appropriate safeguarding responses.
- **Complaints Policy**
- **Allegation Management Policy**
- **Confidential Reporting Policy.**
- **Information Sharing Policy** (internal and external exchange of information)
- **Looked after Children Policy** inclusive of named LA teacher whose role is to champion the achievement of LAC in the Academy and work closely with the Designated Safeguarding Lead and the Virtual Head Teacher within North Yorkshire Council who has responsibility for LAC.

- **Intimate Care and Care Plan Policy** – inclusive of procedure to support young people who have an accident and either wet, soil or menstruate and need assistance.
- **Unaccompanied travel to and from academy procedure** to ensure young people's safety.
- **Single equality scheme.**
- **Spiritual, Moral, Social and Cultural Curriculum** inclusive of Female Genital Mutilation, Forced Marriage, Domestic abuse, Child Sexual Exploitation, Mental Health and Well-being and Fundamental British Values.
- **Relationship and Sex education (RSE) Policy (Secondary)** inclusive Health Education content.

FINAL

## Appendix A: ABUSE, NEGLECT AND EXPLOITATION

### Indicators of abuse, neglect and exploitation

**Abuse:** a form of maltreatment of a young person. Somebody may abuse, neglect and/or exploit a young person by inflicting harm or failing to act to prevent harm. Young people may be abused in a family or in an institutional or community setting; by those known to them, or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Young people may be abused by an adult or adults or by another child or children. Abuse can also be a result of children witnessing the ill-treatment of others, such as seeing, hearing or experiencing domestic abuse and its effects.

We recognise that young people are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. (See child on child abuse)

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

**Sexual Abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children/young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children/young people to behave in sexually inappropriate ways, or grooming a child/young person 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/young people. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their academies policy and procedures for dealing with it.

**Emotional Abuse** is the persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects on the young person's emotional development.

It may involve conveying to young people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on young people.

These may include interactions that are beyond their developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people.

Some level of emotional abuse is involved in all types of maltreatment of a child or young person, though it may occur alone.

We recognise that young people with special educational needs (SEN) and disabilities can face additional safeguarding challenges, and these are discussed in Springwater's training programme for colleagues.

These additional barriers can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploration
- Young people with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

**Neglect** is the persistent failure to meet a child or young person's basic physical and/or psychological need, likely to result in the serious impairment of the young person's health or development.

Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food and clothing, 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 caretakers)
- Ensure access to appropriate medical care or treatment

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

## SPECIFIC SAFEGUARDING ISSUES

### Appendix B: Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children and young people can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children or young people, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child or young person may be a contributing factor for an imbalance of power, there are a range of other factors that could make them more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children/young people:

- Appear with unexplained gifts, money or new possessions
- Associate with other children involved in exploitation
- Suffer from changes in emotional well-being
- Misuse drugs and alcohol
- Go missing for periods of time or regularly come home late
- Regularly miss school or education or do not take part in education

Young people who have been exploited will need additional support to help maintain them in education.

### Child Criminal Exploitation (CCE)

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

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

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

## Child Sexual Exploitation (CSE)

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

CSE can occur over time or be a one-off occurrence, can range from opportunist to complex organised abuse and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

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

Signs include:

- Underage sexual activity
- Inappropriate sexual or sexualised behaviour
- Sexually risky behaviour, e.g. 'swapping' sex
- Repeated sexually transmitted infections
- In girls, repeated pregnancy, abortions, miscarriage
- Having multiple mobile phones and worrying about losing contact via mobile phone
- Having unaffordable new things (clothes, mobile phone) or expensive habits (alcohol, drugs)
- Changes in the way they dress
- Going to hotels or other unusual locations to meet friends
- Seen at known places of concern
- Moving around the country, appearing in new towns or cities, not knowing where they are
- Getting in/out of different cars driven by unknown adults
- Having older boyfriends or girlfriends
- Contact with known perpetrators
- Involved in abusive relationships, intimidated and fearful of certain people or situations
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- Recruiting other young people into exploitative situations
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual, mood swings, volatile behavior and / or emotional distress)
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders

- Getting involved in crime / police involvement, police records
- Involved in gangs, gang fights, gang membership
- Injuries from physical assault, physical restraint and/or sexual assault

## COUNTY LINES

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children/young people can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children:

- Persistently going missing from home or school and subsequently found in areas away from their home
- In excessive receipt of calls and text messages
- In relationships with older, controlling individuals
- Associated with gangs
- Under suspicion of self-harm, physical assault or unexplained injuries
- With parental concerns
- Showing a significant decline in school performance
- Demonstrating significant changes in emotional wellbeing
- Have been the victim or perpetrator of serious violence (e.g. knife crime)
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- Are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- Are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
- Owe a ‘debt bond’ to their exploiters
- Have their bank accounts been used to facilitate drug dealing

## SERIOUS VIOLENCE

All colleagues should be aware of the indicators, which may signal young people are at risk from, or are involved with serious violent crime.

These may include:

- Increased absence from school
- A change in friendships or relationships with older individuals or groups
- A 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 could also indicate that young people have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).

All colleagues should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as:

- 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

## Appendix C: So-called 'honour'-based abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including:

- Female Genital Mutilation
- Forced Marriage
- Breast Ironing

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, colleagues should speak to the designated safeguarding lead (or deputy). Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child or young person being at risk of HBA, or already having suffered HBA.

### Female Genital Mutilation (FGM)

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

Type 1	Type 2	Type 3	Type 4
Clitoridectomy:  Partial/total removal of clitoris	Excision:  Partial/total removal of clitoris and labia minora	Infibulation:  Entrance to vagina is narrowed by repositioning the inner/outer labia	All other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area

#### Why is it carried out?

Belief that FGM:

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

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

### **Circumstances and occurrences that may point to FGM happening**

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

### **Signs that may indicate a young person has undergone FGM:**

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

## **Forced Marriage**

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children and young people from forced marriage.

Signs and symptoms may include:

- Young person may appear anxious, depressed and emotionally withdrawn with low self-esteem.
- They may have mental health disorders and display behaviours such as self-harming, self-cutting or anorexia.
- Sometimes they may come to the attention of the police having been discovered shoplifting or taking drugs or alcohol.
- Often a young person's symptoms can be exacerbated in the periods leading up to the holiday season.
- Young people may present with a sudden decline in their performance, aspirations or motivation.
- They may be subject to excessive restrictions and control at home.
- Some young people may not be allowed to attend any extra-curricular or after-school activities.
- Girls and young women may be accompanied to and from school or college, and even during lunch breaks.
- Some young people may stop attending school or college.

- Their homework is incomplete or appears rushed. This may be the result of being actively discouraged from doing it by family members.
- Young people may do their homework late at night, which frequently shows in school because they are lethargic, unable to concentrate and have a general appearance of tiredness.
- Professionals being told that the young person is out of the country.
- There are occasions when older siblings (usually brothers) and cousins keep a close eye on girls to make sure that they do not meet anyone or talk to friends.
- Conflict between the child and their parents about whether the child will be allowed to continue their education.
- Family history of older siblings leaving education early and marrying early.

FEMINA

## Appendix D: Preventing Radicalisation

Children and young people are vulnerable to extremist, mixed or unclear ideology and radicalisation. Similar to protecting young people from other forms of harms and abuse, protecting young people from this risk should be a part of a schools' or colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a young person is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a young person's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, colleagues should be alert to changes in young people's behaviour, which could indicate that they may need help or protection. Colleagues should use their judgement in identifying young people who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The academy DSL (and any deputies) should be aware of local procedures for making a Prevent referral.

### The Prevent Duty

All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

### School Leaders must:

- Familiarise themselves with the revised Prevent duty guidance: for England and Wales
- Take part in Prevent training and ensure staff have the relevant training
- Assess local risk of extremism
- Ensure there are robust IT protocols to filter out extremist materials
- Ensure school buildings are not being used to give a platform to extremists

### Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend

the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

### **Understanding and recognising risks and vulnerabilities of radicalisation**

Children and young people can be drawn into violence, or they can be exposed to the messages of extremist groups by many means. These may include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet. This can put a young person at risk of being drawn into criminal activity and has the potential to cause significant harm.

Colleagues should use their judgement in identifying young people who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Possible indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- Advocating violent actions including:
  - Association with known extremists
  - Seeking to recruit others to an extremist ideology

## Appendix E: Private Fostering

Many people find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative.

If the arrangement is to last, or has lasted, for 28 days or more it is private fostering.

The Children Act 1989 defines a relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a step-parent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness
- Children whose parents cannot care for them because their work or study involves long or antisocial hours
- Children sent from abroad to stay with another family, usually to improve their educational opportunities
- Unaccompanied asylum-seeking and refugee children
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents
- Children staying with families while attending a school away from their home area

There is a mandatory duty on the school to inform children's social care of a private fostering Arrangement. Children's social care has a duty to check that the young person is being properly cared for, and that the arrangement is satisfactory.

### Further information:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/274414/Children\\_Act\\_1989\\_private\\_fostering.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/274414/Children_Act_1989_private_fostering.pdf)

## Appendix F: Children missing from education

All colleagues should be aware that children and young people going missing, particularly repeatedly, unexplainable and/or persistent absences from education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child or young person going missing in future. Colleagues should be aware of the academies unauthorised absence and children missing from education procedures.

Further information can be found in 'Children Missing Education' statutory guidance for local authorities – August 2024.

## Appendix G: Sexual violence and harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Colleagues should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

All colleagues have been made 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
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”
- 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

### Sexualised behaviour

Green Behaviours...	Amber Behaviours...	Red Behaviours...
<p>are part of safe and healthy sexual development which are:</p> <ul style="list-style-type: none"> <li>• displayed between children or young people of similar age or developmental ability</li> <li>• reflect curiosity, experimentation, consensual activities and positive choices</li> <li>• ‘normal’ but inappropriate within the school/classroom setting</li> </ul>	<p>are potentially outside of safe and healthy development due to:</p> <ul style="list-style-type: none"> <li>• age or developmental differences</li> <li>• activity type, frequency, duration or context</li> </ul>	<p>are clearly outside of safe and healthy development and:</p> <ul style="list-style-type: none"> <li>• involve much more coerciveness, secrecy, compulsiveness &amp; threat</li> <li>• require action from school &amp; other agencies</li> </ul>

For further information of sexualised behaviour thresholds visit [Harmful sexual behaviour framework: an evidence-informed operational framework for children and young people displaying harmful sexual behaviours \(nspcc.org.uk\)](https://www.nspcc.org.uk/what-we-do/our-approach/harmful-sexual-behaviour-framework/)

## See Guidance on Harmful Sexual Behaviour document

### Sexual violence

It is important that academy colleagues are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

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

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

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

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

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

Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape

### Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual

harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual "jokes" or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nudes and semi-nude images and/or videos.
  - sharing of unwanted explicit content
  - upskirting (is a criminal offence)
  - sexualised online bullying
  - unwanted sexual comments and messages, including, on social media
  - sexual exploitation; coercion and threats

## **Upskirting**

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

## Appendix H: Modern slavery, Trafficking and Child Abduction/community incidents

### Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM (National Referral Mechanism) is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

### Human Trafficking

Human trafficking is 'the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs'.

### Child trafficking

"Child" shall mean any person under eighteen years of age. Any child transported for exploitative reasons is considered to be a trafficking victim, whether or not they have been forced or deceived. This is partly because it is **not considered possible for children to give informed consent**. Even when a child understands what has happened, they may still appear to submit willingly to what they believe to be the will of their parents or accompanying adults. It is important that these children are protected too.

Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working in cannabis farms. There are a number of cases of minors being exploited in the sex industry. Although there is no evidence of other forms of exploitation such as 'organ donation or 'harvesting', all agencies should remain vigilant.

Children may be trafficked from other countries for a variety of reasons. There are a number of factors in the country of origin which might make children vulnerable to being trafficked.

The factors listed below are by no means a comprehensive list:

- Poverty
- Lack of education
- Discrimination
- Cultural attitudes
- Grooming
- Dysfunctional families
- Political conflict and economic transition and
- Inadequate local laws and regulations

## **Potential indicators that a child may have been trafficked**

Once in the UK the child:

Receives unexplained/unidentified phone calls whilst in placement/temporary accommodation

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Has a history with missing links and unexplained moves
- Has gone missing from local authority care
- Is required to earn a minimum amount of money every day
- Works in various locations
- Has limited freedom of movement
- Appears to be missing for periods
- Is known to beg for money
- Performs excessive housework chores and rarely leaves the residence
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good; is one among a number of unrelated children found at one address
- Has not been registered with or attended a GP practice
- Has not been enrolled in school
- Has to pay off an exorbitant debt, e.g. for travel costs, before having control over own earnings, is permanently deprived of a large part of their earnings by another person
- Is excessively afraid of being deported

### **Further information:**

[www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance](http://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance)

## **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby, unknown adults engaging children in conversation, rumours about undesirable residents or adults in vehicles approaching children. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe.

The academy curriculum addresses how pupils are taught to stay safe within the community.

Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org)

## Appendix I: Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members or an institutional and community setting by those known to them or, more rarely, by others. (KCSIE)

The cross-government definition of domestic abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Domestic Abuse can impact on children through seeing, hearing or experiencing. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Children can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures will be followed and both young victims and young perpetrators will be offered support.

### **Signs, indicators and effects:**

It is often difficult to tell if domestic abuse is happening because it takes place in the family home and abusers can act very differently when other people are around. Children who witness domestic abuse may show signs of:

- Aggression and bullying
- Anti-social behaviour
- Depression, anxiety or have suicidal thoughts
- Attention seeking
- Bed wetting, nightmares or insomnia
- Drug and alcohol misuse
- Constant or regular sickness, such as colds and headaches
- Eating disorders
- Not doing as well in school – due to difficulties at home or disruption of moving to, as well as from, refuges
- Withdrawal

**Other signs and symptoms may include:**

- Sudden change of behaviour
- Clingy
- Soiling clothes
- Risk taking behaviours
- Missing school
- Changes in eating habits
- Obsessive behaviour
- Self-harm

Source: [www.nspcc.org.uk](http://www.nspcc.org.uk)

Some children may not display any symptoms / behaviours that may be a cause for concern. 'What is life like at home?' – is a good question to use regularly with all children.

**We are an 'Operation Encompass' school**

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police should inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

## Appendix J: Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. (KCSIE)

Types of homelessness could include:

- Living in temporary or emergency accommodation (such as B & Bs and hostels)
- Hidden homelessness (staying with friends or family on a temporary basis or living in overcrowded conditions)
- Couch / sofa surfing, moving from one place to another

Impact of homelessness:

- Practical issues include loss of possessions required for school e.g. books, uniform etc.
- May be unkempt due to lack of laundry services
- Physically exhausted due to sleeping arrangements
- Emotionally exhausted due to increased stress
- Signs of severe emotional trauma leading to emotional stress, anxiety
- Changes in behaviour and/or problematic behaviour
- Child may become withdrawn or aggressive
- If placed out of area they may arrive late or miss school due to transport / financial difficulties
- The child's ability to maintain relationships may be affected
- May 'stand out' more to peers, leading to feelings of alienation and self-consciousness
- Impact on attainment levels and ability to learn

**(Shelter 2017)**

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. (KCSIE)

**Appendix K: Example Cause for Concern form**



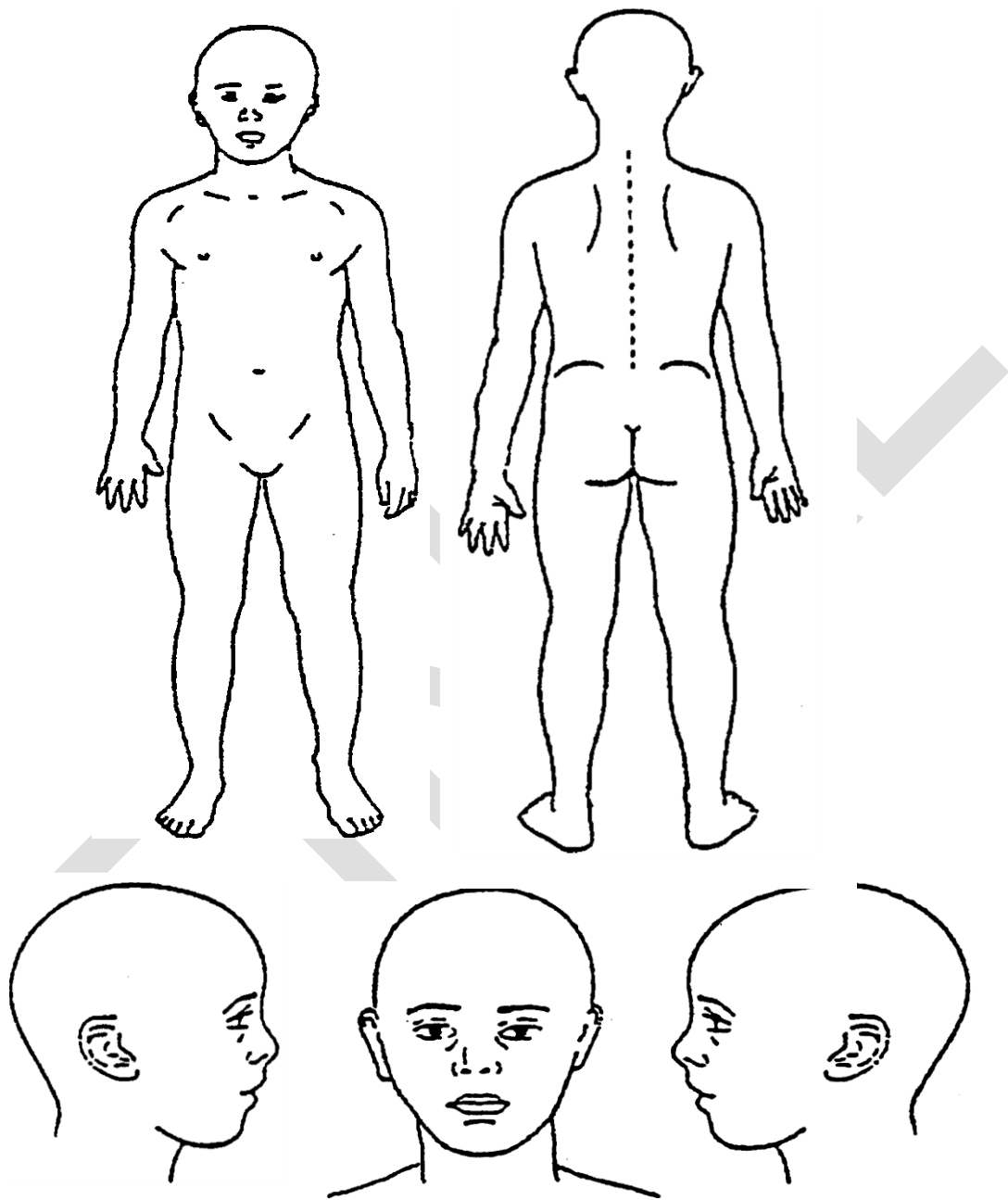
**In the event that CPOMS cannot be accessed**

<b>Full Name of Child:</b>		<b>DOB:</b>
<b>Time of concern:</b>	<b>Date of concern:</b>	<b>Place of concern:</b>
<b>Concern/Incident</b>		
<b>Detailed Account:</b> <p>(Please bullet point. Do not interpret what is seen or heard; simply record the facts. After completing the form, pass it immediately to the designated safeguarding lead / deputy)</p>		
<b>Colleague Actions:</b> (Bullet point any actions already taken and any future actions to be completed)		
<b>Member of Staff completing form</b>	<b>Role / Title</b>	

**Please provide a copy to the designated safeguarding lead**

**Appendix K: Body Map**

Child's Full Name	DOB	Date



Description of injury / additional notes:		
Professional's Name	Professional's Designation	Contact Number

**Appendix K: Designated Safeguarding Lead Check List**

Possible Action	By Whom	Outcome
Discuss with child		
Contact parents		
Check records in school		
Discuss with relevant professionals		
Check with schools who have siblings		
Seek advice from LA		
Monitor and review		
Consider an early help assessment		
Consult with Social Care		
Contact police 101: Non-emergency 999: Immediate Danger		
Other (please specify)		
<b>Assessment of Risk</b>		
Safeguarding	Risk of Harm	Immediate Danger

## Appendix L: Online safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. We will adopt a whole school approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- We will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, colleague training, the role and responsibilities of the DSL and parental engagement.
- The school identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - **Content:** being exposed to illegal, inappropriate or harmful content. For example, pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories.
  - **Contact:** being subjected to harmful online interaction with other users. For example, child on child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit children for sexual, criminal, financial or other purposes.
  - **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
  - **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- We recognise that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face.
- The head of academy will be informed of online safety concerns by the DSL, as appropriate. The named trustee for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider trustee board.

### Policies and Procedures

- The DSL has overall responsibility for monitoring online safety of the academies young people liaising with other Trust colleagues, for example the IT support team.
- The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including our anti-bullying, social media and behaviour (Readiness to learn) policies.
  - Internal sanctions and/or support will be implemented as appropriate.
  - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

- We use a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
  - All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- We recognise the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with **KCSIE 2025** the school has appropriate mobile and smart technology, image use, online and acceptable use policies in place, including safe use of generative AI, which are shared and understood by all members of the community.

### **Appropriate Filtering and Monitoring**

The leadership and relevant colleges are:

- Aware of all internet monitoring and filtering systems
  - Manage them effectively
  - Know how to escalate concerns when they are identified
- We will do all we reasonably can to limit young people's exposure to online risks through Trust/academy provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.
  - We acknowledge that whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety.
    - Young people will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
    - Internet use by young people will be supervised by Springwater colleagues.
    - Young people will be directed to use age-appropriate online resources and tools by Springwater colleagues.

### **Information Security and Access Management**

- The academy with the support of the IT support team is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as colleagues and young people.
- We will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

### **Training**

- We will ensure that all colleagues receive online safety training as part of induction and that ongoing online safety training and update for all colleagues will be integrated, aligned and considered as part of our overarching safeguarding approach.

### **Educating Children and young people**

- We will ensure a comprehensive whole school curriculum response is in place to enable all children to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. This will include teaching children and young people how to critically

evaluate risks and relationships online, as well as the risks posed with rapidly developing technology such as AI and deepfakes

### **Working with Parents/Carers**

- We will build a partnership approach to online safety and will support parents/carers to become aware of and alert to the potential online benefits and risks for children by:

### **Remote Learning**

#### **See remote learning policy**

- We will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with young people and parents/carers will take place using academy provided or approved communication channels; for example, school provided email accounts and phone numbers and agreed systems e.g. Microsoft 365 or equivalent.
  - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Colleagues and young people will engage with remote teaching and learning in line with existing behaviour principles as set out in our Readiness to Learn Policy/code of conduct and acceptable use policies.
- Colleagues and young people will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, colleagues will follow our remote learning policy.
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. We will continue to be clear who from the academy their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

**APPENDIX M: SAFEGUARDING INDUCTION SHEET  
(FOR NEW OR SUPPLY COLLEAGUES, VISITORS AND VOLUNTEERS)**

We all have a statutory duty to safeguard and promote the welfare of children, and in our Trust we take this responsibility seriously.

If you have any concerns about a child or young person in our academy, you must share this information immediately with our designated safeguarding lead (DSL) or deputy.

Do not think that your worry is insignificant if it is about hygiene, appearance or behaviour – we would rather you told us as we would rather know about something that appears small than miss a worrying situation.

**If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the designated safeguarding leads detailed below and provide them with a written record of your concern.**

**A copy of the form to complete is attached to this and others can be obtained from** (the main office) **Please ensure you complete all sections as described.**

**If you are unable to locate one of the designated safeguarding leads, ask a member of the school office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter.**

Any allegation concerning a colleague, a child's foster carer or a volunteer should be reported immediately to the headteacher. If an allegation is made about the headteacher you should pass this information to the CEO. Alternatively, you can contact the local authority designated officer on Tel: **(01609 798005)** [NSPCC whistleblowing helpline](#) is also available for colleagues who do not feel able to raise concerns regarding child protection failures internally.

Colleagues can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

**The people you should talk to in school are:**

<b>Designated safeguarding lead (DSL):</b>	<b>James Marks</b>
Location of office:	Student Support Office
Contact number:	07463 771391
<b>Deputy designated safeguarding lead:</b>	<b>Kim Aryton – Monday – Wednesday</b>
Location of office:	Deputy Head Office
Contact number:	07974 439162
<b>Deputy designated safeguarding lead:</b>	<b>Melissa Sparks – Thursday – Friday</b>
Location of office:	Deputy Head Office
Contact number:	07974 439162
<b>Deputy designated safeguarding lead:</b>	<b>Andrew Sudron</b>
Location of office:	Learning and Cognition Office
Contact number:	07891 800861
<b>Deputy designated safeguarding lead:</b>	<b>Mike Finlay</b>
Location of office:	Headteacher's Office
Contact number:	07471 203362

<b>Deputy designated safeguarding lead:</b>	<b>Andy Mullane</b>
Location of office:	Deputy Head Office
Contact number:	01423 883214
<b>Trust Safeguarding Lead:</b>	<b>Adele Pearson</b>
Email address:	<a href="mailto:apearson@ascenttrust.org">apearson@ascenttrust.org</a>
<b>Chair of Trustees and Trustee Safeguarding Link.</b>	<b>Lynn Watson</b>
Email address:	<a href="mailto:lwatson@ascenttrust.org">lwatson@ascenttrust.org</a>

*At Springwater Academy we strive to safeguard and promote the welfare of all of our children.*

F E M N A W