Safeguarding and Child Protection Model Policy for Education Establishments: guidance for use

This model policy has been designed to be adapted by Head Teachers / Principals and Governing Bodies to reflect the ethos of your own school or education setting. It remains the responsibility of the school and their governing body to ensure the policy is compliant with the statutory requirements and guidance which governs educational establishments. It is essential that all aspects of this policy are reviewed to ensure that there is parity between the written policy and practice of the educational establishment.

This model policy will be reviewed regularly and updated annually. However, if Statutory Guidance changes, the policy will be updated and re-circulated accordingly. This does not take away the responsibility of the organisation to ensure there is an effective safeguarding policy in place which meets the requirements of the statutory guidance in place at that time.

The School must review and update the safeguarding policy annually and make the policy available publicly via the school website or by other means.

In drawing up your safeguarding policy you will need to consider the range of people who will refer to the policy: teaching staff, support & lunch staff, parent helpers, volunteers, supply staff etc. as well as young people in the setting. You will also need to consider such issues as:

- How will a visiting teacher / agency / supply member of staff be made aware of the information contained within your safeguarding policy and their responsibility to comply?

- How the policy will be shared with other organisations commissioned to provide a service in your school

- Who will inform a volunteer from the local community about issues like confidentiality or how to raise concerns about practice in the school?

You may also find it useful to produce a brief “welcome sheet” for visitors to the school, including a summary of the safeguarding policy, the name of the Designated Safeguarding Lead (DSL)and what action to take if someone has a concern.

MODEL SAFEGUARDING AND CHILD PROTECTION POLICY FOR SCHOOLS AND EDUCATION SERVICES

Updated: August 2026

Review date: August 2027

V.1

Produced by the Safeguarding in Education Team for Luton

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Updates and Omissions

SECTION	PAGE	UPDATE	REASON	WHO	DATE
Whole Document		Changed links to new KCSiE 2026 Document	Updated Guidance	Government	Sept 2026
Whole Document		Threshold document changed to Pan Bedfordshire Effective Support Meeting the Needs of Children Guidance	One document across three local areas	Local Authority	Sept 2026
Whole Document		Changed links to new Working Together 2026 Document	Updated Guidance	Government	Sept 2026
2, 5, 19	12, 15, 27	References to universal services and community based early help and targeted early help services	Update from KCSiE 2026	Government	Sept 2026
1, 2, 32	11,13, 38	References to Every Child Achieving and Thriving and The Families First Partnership (FFP) Programme Guide	Government initiative/ Reform of Family Help	Government	Sept 2026
1, 18	9, 25	Addition of 'including harassment and violence' to child-on-child abuse	Update from KCSiE 2026 to provide clarity	Government	Sept 2026
33, Appendix 5	39, 56	Addition of 'allegation against a member of staff to now include supply staff, trainee teachers, volunteers and contractors	Change in law now within KCSiE 2026	Legislation	Sept 2026
2, Appendix 1	12, 43	Further information regarding the availability of the DSL	Clarity over when DSL should be available	Government	Sept 2026
2	13	Education as a strategic partner	Clarity that Education is seen as a strategic partner	Government	Sept 2026
6	15	Addition of child to parent or caregiver abuse	Recognition that the child can be the abuser in a family	Government	Sept 2026
6	16	Reference to Nursery Schools and responsibilities in relation to EYFS	Not so relevant to our setting	Government	Sept 2026
13	20	Addition of racism, derogatory behaviour, faith-based prejudice or other forms of physical violence Addition of 'online element' in relation to sexual harassment	To provide clarity for curriculum delivery	Government	Sept 2026
14	21	Addition of filtering and monitoring reviewing responsibilities New section on Mobile Phones New guidance in relation to nudes and semi-nudes, including where generated by AI	Already an expectation but now made more explicit. Expectation that all schools should be mobile phone free To provide clarity and language change to resonate with younger people	Government	Sept 2026
15	22	Reference to the Local Authority Approved Provide List	Linked to Alternative Provision	Local Authority	Sept 2026

16	23	Completed National Referral Form Email	New pathway for Prevent referrals	Prevent	Sept 2026
18	25	Further types of abuse added under child-on-child abuse. Addition of 'discriminatory behaviour, including racism, faith targeted abuse and other prejudice-based incidents Addition to victim and perpetrator under child-on-child abuse Reference to non-consensual sharing of nudes and semi-nudes Addition of 'schools being alert to when children might be at highest risk around the school day,	Provide additional clarity around what constitutes child-on-child abuse. Recognition that the perpetrator could also be a victim of abuse Added to list of child-on-child abuse	Government	Sept 2026
20	27 29	New paragraph around serious violence and Youth Endowment Fund (YEF) New paragraph around organised networks/gangs Serious violence definition	Where to find support Understanding around children not always being recognised as victims when identifying as a member of gangs/networks	Government	Sept 2026
21	29	Reference to consensual and non-consensual images	Links to guidance on how to respond to these concerns	UK Council for Child Internet Safety	Sept 2026
24	32	New paragraph related to mental health support being evidence as safe and effective	Ensure schools are using appropriate support interventions	Government	Sept 2026
28	35	New paragraph around Young Carers	Understand the impact being a young carer can have on their schooling	Government	Sept 2026
29	36	Additional information in relation to gender questioning children	Provide guidance and clarity	Government	Sept 2026
32	38	Definition of multi-agency working Additional paragraph around Families First Partnership Information around 'Lead Practitioner	Clarity Understand that the lead practitioner need not be a social worker	Government	Sept 2026
Appendix 2	44	CSE to include 'an online element which facilitates, threatens and/or encourages sexual violence	Clarity	Government	Sept 2026
Appendix 3	50	Sexual abuse to include penetration of an object Sexual abuse to include 'causing'	Clarity	Government	Sept 2026

Links with other Policies

This safeguarding policy has obvious links with the wider safeguarding agenda: when agreeing or reviewing the policy, links should be made with other relevant guidelines and procedures such as (but not limited to)

- Safer Recruitment
- Code of conduct
- Visitor / external speakers
- Online safety
- Whistleblowing
- Children Missing Education
- Inclusion
- Child on Child Abuse
- Physical restraint & restriction of liberty
- PSHE
- Disqualification
- Social Networking
- Health and Safety
- Bullying
- Code of behaviour/conduct

It is essential that Hillborough Junior School's safeguarding policy describe the procedures, which are in accordance with the locally agreed Pan Bedfordshire Interagency Child Protection procedures (Contents) published by the Safeguarding Children Partnerships.

Recording systems and procedures

It is essential that the school include within this policy a section on the internal safeguarding recording procedures. That includes recording rationale for making decisions (inc. decision not to make a referral).

Maintaining an overview

Schools must ensure that they maintain an overview, whether this is a list, index or something similar, which provides an at a glance of the children/young people where safeguarding records exist for them and whether this be an individual case record or for example an entry within an A-Z folder

School acknowledgement

At Hillborough Junior School, we are committed to safeguarding and child protection in line with the statutory guidance.

As required, all staff have read and understood part one of Keeping Children Safe in Education (2026)

The Designated Safeguarding Lead (DSL) is: David Bradshaw (Head Teacher)

The Deputy DSL is: Lisa Whitney (Family Worker); Penny Whelan (Asst. Head); Suzie Bradshaw (Asst. Head); Jack Stevens (Asst. Head); Liam O'Donnell (Dep. Head)

The Safeguarding Governor is: Robin Cowan (Chair); Ruth Deacon

The Prevent Single Point of Contact (SPoC) is: David Bradshaw (Head Teacher)

The Operation Encompass SPoC is: David Bradshaw (Head Teacher); Lisa Whitney (Family Worker)

Local Authority Designated Officer (LADO) is Paul James - lado@luton.gov.uk

Multi Agency Safeguarding Hub (MASH) Tel: 01582 547653 during office hours. 0300 300 8123 for out of hours
https://m.luton.gov.uk/Page/Show/health_and_social_care/safeguarding/safeguarding_children/Pages/default.aspx?redirectToMobile=True

Local Multi Agency Safeguarding Arrangement Note:

The Children and Social Work Act 2017 (the Act) replaces Local Safeguarding Children Boards with new local safeguarding arrangements led by three safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups). The Act places a duty on those partners to make arrangements for themselves and **relevant agencies** they deem appropriate, to work together for the purpose of safeguarding and promoting the welfare of children/young people in their area. Education is one of the relevant agencies.

Safeguarding Bedfordshire

PART ONE: SAFEGUARDING POLICY

Ratified by the Governing Body: 17/092026 To be reviewed (annually): September 2027

1. Introduction

Safeguarding 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.

Child Protection 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. (Working Together, DfE 2026)

This includes, but is not limited to safeguarding children/young people in specific circumstances:

- Neglect
- Emotional abuse
- Bullying, including online and prejudice-based bullying
- Gender based violence/violence against women and girls
- Child Sexual Exploitation and trafficking
- Teenage relationship abuse
- Gang/youth violence including initiation/hazing
- Female Genital Mutilation
- Physical abuse
- Sexual abuse
- Racist, disability and homophobic or transphobic abuse
- Radicalisation and/ or extremist behaviour
- Honour Based Abuse
- Child on Child abuse (including harassment and violence)
- Substance abuse
- Domestic abuse/violence
- Forced marriage

- Fabricated/induced illness
- Poor parenting

- Online including grooming via social networking, online gaming, video messaging
- Self-harm behaviours
- Upskirting
- The impact of new technologies on sexual behaviour: e.g. Youth Produced Sexual Imagery
- Children/young people with mental health difficulties or illness
- Contextual/Extra familiar risks
- Exploitation

Hillborough Junior School is committed to safeguarding and promoting the welfare of all its children/young people.

We believe that:

- all children/young people have an equal right to be protected from harm.
- children/young people need support which matches their individual needs, including those who may have experienced abuse.
- all children/young people have the right to speak freely and voice their values and beliefs.
- all children/young people must be encouraged to respect each other's values and support each other.
- all children/young people have the right to be supported to meet their emotional, and social needs as well as their educational needs.
- schools can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk-taking behaviours (behaviours which may be perceived to be 'risky')
- all staff, volunteers and visitors have an important role to play in safeguarding children/young people and protecting them from abuse.

Hillborough Junior School will fulfil their local and national responsibilities as laid out in the following documents:

- Working Together to Safeguard Children (DfE,2026)
- Keeping Children Safe in Education, 2026

- Information Sharing (DfE 2024)
- The procedures of the Pan Bedfordshire and Safeguarding Children Boards Contents
- Working together to improve school attendance (DfE 2026)
- The Children Act 1989
- The Education Act, 2002 (s175 / s157)
- What to do if you are worried a child is being abused (DfE, 2015)
- Restrictive Interventions, including use of reasonable force in schools (DfE, 2026)
- Mental health and behaviour in schools: departmental advice (DfE, 2018)
- Preventing and tackling bullying: Advice for Head teachers, staff and governing bodies (DfE, 2017)
- Prevent duty guidance: England and Wales (2023)
- Serious Crime Act 2015
- Sharing nudes and semi-nudes: Advice for education settings working with children and young people, Gov.uk 2024
- Criminal exploitation of children and vulnerable adults county lines (Home Office guidance 2023)
- Children missing education (DfE, 2016)
- Statutory guidance on children who run away or go missing from home or care (DfE, 2017)
- Child sexual exploitation: definition and guide for practitioners (DfE, 2017)
- The Domestic Abuse Act 2021
- Drugs (DfE and ACPO guidance)
- Child sexual exploitation: definition and guide for practitioners (DfE, 2017)
- Pan Bedfordshire Effective Support Meeting the Needs of Children Guidance

- Mobile Phones in Schools Guidance (DfE, 2026)
- Generative AI: product safety expectations to support schools (DfE, 2026)
- The Families First Partnership (FFP) Programme Guide (DfE, 2026)
- Allergy Safety in Schools (DfE, 2026)

2. The Designated Safeguarding Lead

Our Designated Safeguarding Lead, David Bradshaw, is a member of the Senior Leadership Team and takes lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children/young people in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children/young people's attendance, engagement and achievement at school.

They will provide support to staff members to carry out their safeguarding duties and will liaise closely with other services such as the Multi-Agency Safeguarding Hub (MASH), Children's Social Care, health, police etc.

The Designated Safeguarding Lead is supported by the following Deputy Designated Safeguarding Lead/s:

- Lisa Whitney (Family Worker)
- Penny Whelan (Asst. Head)
- Jack Stevens (Asst. Head)
- Suzie Bradshaw (Asst. Head)
- Liam O'Donnell (Dep. Head)
- Nigel Deacon (Lead Practitioner for the Hillrise SEMH Service Provision)

The Deputy Designated Safeguarding Lead/s are trained to the same level as the Designated Safeguarding Lead and will undertake this role operationally with direct oversight and management from the Designated Safeguarding Lead who maintains lead responsibility for safeguarding and child protection (including online safety, filtering and monitoring).

During term time, the Designated Safeguarding Lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. The designated safeguarding lead (or a deputy) is expected to be available in person. However, it is a matter for individual schools and the DSL to arrange adequate and appropriate cover arrangements for any out-of-hour/out of term activities.

The Designated Safeguarding Lead is supported in developing knowledge and skills to:

- Encourage a culture of listening to children/young people and taking account of their wishes and feelings, among all staff, and in any measures the school puts in place to protect them.
- Understand the difficulties that children/young people may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

When the school has concerns about a child/young person, the Designated Safeguarding Lead or Deputy will decide what steps should be taken in accordance with the Pan Bedfordshire – Effective Support Meeting the Needs of Children Guidance and initiate a response accordingly. This may include providing universal services and community-based early help, targeted early help services, undertaking a MASH referral/Children's Social Care for a statutory social work assessment.

The Head Teacher will be kept appraised of cases as appropriate.

The DSL and deputies should liaise with the three safeguarding partners and work with agencies in line with Working Together to Safeguard Children (2026), when to call police should help the DSL understand when they should consider calling the police and what to expect if they do so.

The school, particularly DSLs have due regard to Every Child Achieving and Thriving and The Families First Partnership (FFP) Programme Guide and recognise education as a strategic safeguarding partner within the Local Safeguarding Children's Partnership.

For further information on the roles and responsibilities of the DSL, please see Appendix One.

The DSL will not disclose to a parent any information held on a child/young person if this would put the child at risk of significant harm. In such circumstances, advice will be sought from Children's Social Care.

If a child/young person moves from our school, the DSL will ensure child protection records are forwarded on to the DSL at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records.

The DSL shall ensure the child protection files are transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child/young person arrives (KCSIE 2026).

The DSL will also consider if it would be appropriate to share any information that would allow the new school or setting to continue supporting children/young people, in advance of the child/young person leaving.

Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools. The DSL will record where and to whom the records have been passed and the date. We will ensure secure transit and obtain a confirmation of receipt.

If sent by post, children/young person's records will be sent by "Special/Recorded Delivery". For audit purposes, a note of all children/young people's records transferred or received should be kept in either paper or electronic format. This will include the child/young person's name, date of birth, where

and to whom the records have been sent and the date sent and/or received.

- If a child/young person is permanently excluded and moves to a Pupil Referral Unit or Alternative Learning Provision, child protection records will be forwarded on to the relevant organisation.

- If a child/young person is being removed from school in order to be home educated, the school will ensure all relevant safeguarding information is shared with the Elective Home Education team.

- Where a vulnerable child/young person is moving to a Further Education establishment, consideration should be given to the student's wishes and feelings on their child protection information being passed on in order that the FE establishment can provide appropriate support.

- When a DSL resigns their post or no longer has child protection responsibility, there should be a full face-to-face handover/exchange of information with the new post holder - this exchange should be recorded as part of the incoming role holder's induction/performance management.

- In exceptional circumstances when a face-to-face handover is not feasible, the Head Teacher will ensure that the new post holder is fully conversant with all procedures and case files.

3. Overall Aims

This policy will contribute to safeguarding our children/young people and promoting their welfare by:

- Clarifying standards of behaviour for staff and children/young people

- Contributing to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect, and shared values.

- Creating an organisational culture that is safe for children/young people.

- Introducing appropriate work within the curriculum

- Encouraging children, young people and parents to participate

- Developing staff's awareness of the risks and vulnerabilities children/young people face to enable them to recognise and respond to concerns.

- Addressing concerns at the earliest possible stage in the least intrusive way.

4. Key Principles

- Always see the child/young person first and consider what life is like for them, maintaining a culture of vigilance.

- Provide support and intervention at the earliest possible opportunity in the least intrusive way. Children, Young People and Families

- Have conversations, build relationships and maintain professional curiosity.

- Focus on securing improved outcomes for children/young people.

- Build a culture of openness and transparency where all staff are able to demonstrate understanding of their role and responsibility to safeguard and promote the welfare of children/young people.

- Every child/young person is entitled to a rich and rounded curriculum.

- When issues arise, the Head Teacher should speak out, addressing them internally where possible and engaging in a multi-agency response when required in accordance with interagency procedures.

5. Key processes

All staff should be aware of the guidance issued by the Safeguarding Children Partnerships (SCPs) within the Threshold of Need Guide in order to secure support and intervention for children/young people at the earliest possible opportunity in the least intrusive way. This document is integral to safeguarding children/young people in Luton Council's educational establishments and we will always use the Pan Bedfordshire – Effective Support Meeting the Needs of Children Guidance to underpin decision- making.

All staff recognise that any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help.

6. Expectations

All staff and regular visitors will:

- Be familiar with this safeguarding policy and implement this consistently in the course of their work with children/young people.

- Be aware of the role and identity of the Designated Safeguarding Lead and deputies for the school.

- Refer child protection concerns to Children's Social Care in the absence of the DSL and be aware of the statutory assessments under Section 17 and Section 47 of the Children Act 1989 that they may contribute to.

- Be subject to safer recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.

- Be involved in the implementation of individual education programmes, Early Help/Family Help assessments and TAF Support Plans, Child in Need plans and Child Protection plans.

- Be alert to signs and indicators of safeguarding concerns and possible abuse which includes children causing harm to family members, often referred to as child to parent or caregiver abuse.

- Record concerns and pass the record to the DSL, or a member of the Safeguarding Team

- Recognise and respond to concerns about the behaviour of staff, students and volunteers which indicates they may pose a risk of harm to children following interagency procedures agreed by the SCPs.

- Deal with a disclosure of abuse from a child/young person in line with the guidance in Appendix Four.

- All staff and Governors will receive safeguarding training, (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at the point of induction - this will be regularly updated annually.

- The DSL together with named deputies will undertake additional higher level training in order to ensure they have appropriate knowledge and skills to undertake the role and will utilise these training opportunities available from the SCPs and other organisations as agreed by the governing body - this training will be regularly updated at a minimum of two-year intervals.

- In addition to the above, all staff will receive annual safeguarding updates, which may include E-learning, circulation of information and guidance internally, staff meetings, inset training.

- The subject/topics for training and updates will take into consideration SCP's priorities, local context, and needs of our pupils and identified training needs of staff.

- The Early Years Foundation Stage (EYFS) statutory framework should be read alongside KCSIE where children aged 0 to 5 attend school-based nurseries or reception classes.

7. The Governing Body

The Governing Body will ensure that they comply with their duties under legislation. They will have regard to Keeping Children Safe in Education 2026 to ensure that the policies, procedures and training in our school are effective and comply with the law at all times.

Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

The nominated governor for child protection at the school is Robin Cowan (Chair) and Ruth Deacon.

The nominated governor is responsible for liaising with the Head Teacher and DSL over all matters regarding child protection issues. The role is strategic rather than operational; they will not be involved in concerns about individual children/young people.

Please see Appendix Two for more information on the roles and responsibilities of the Governing Body.

8. A Safer School Culture

The culture at Hillborough Junior School is one that is safe for children/young people and unsafe for adults that may pose a risk to children/young people. There is a belief that safeguarding is the responsibility of all adults working or volunteering within the organisation and that all concerns will be reported to the Head Teacher when concerns relate to an adult.

The school has a culture of listening to and hearing the voice of the child/young person.

9. Inspection

- From September 2025, Ofsted's inspections of early years, schools and post–16 provision will be carried out under: Ofsted's Education Inspection Framework.

- Hillborough Junior School will be aware of the new inspection guidance and the requirements from Ofsted. Inspectors will always report on whether or not arrangements for safeguarding children/young people and learners are effective.

- The Independent Schools Inspectorate (ISI) is approved to inspect certain independent schools and will also report on safeguarding procedures. ISI has a published framework which informs how they inspect Independent Schools.

10. Safer Recruitment and Selection

The school pays full regard to Keeping Children Safe in Education 2026. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes

undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS), Childcare (Disqualification) Regulations (where applicable) and prohibition order checks in respect of the following which will also include historic GTCE sanctions.

Hillborough Junior School acknowledges that S128 checks should be completed on those members of staff and Governors taking part in management. A section 128 would prohibit someone from:

- Serving as a governor of a maintained school.
- Holding a management position in an independent school, academy or free school as an employee.
- Becoming a trustee of an academy or free school trust; a governor or member of a proprietor body for an independent school.
- Becoming a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.
- All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of children/young people.

David Bradshaw, Liam O'Donnell, Suzie Bradshaw, Jack Stevens, Nigel Deacon (SEMH Provision Lead), Robin Cowan (Chair of Governors) and Penny Whelan have undertaken Safer Recruitment training. One of the above will be involved in **all** staff/volunteer recruitment processes and sit on the recruitment panel (with the exception of the Chair of Governors who will only sit on Head Teacher Recruitment Panel).

Hillborough Junior School have decided to carry out online searches for shortlisted candidates as part of due diligence in our recruitment process, (as per KCSIE, paragraph 225).

The searches are conducted by Michelle O'Driscoll.

This is recorded on the school record of employment checks.

The process will be consistent, transparent, and fair and reflected within the Safer Recruitment Policy.

11. Operation Encompass

At Hillborough Junior School, we are working in partnership with Luton Borough Council and Bedfordshire Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass.

The system ensures that when the police are called to an incident of domestic abuse, where there are children/young people in the household who have seen, heard or experienced the domestic incident, the police will inform the key adult (usually the DSL or Deputy) in school before they arrive at school the following day. This email will be sent to familysupport@hillborough.juniorluton.co.uk which is accessed by the SPoCs for Operation Encompass.

This ensures that the school has up to date relevant information about the child/young person's

circumstances and can enable immediate support to be put in place, according to their needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or school should make a referral to local authority Children's Social Care if they are concerned about a child/person's welfare.

Hillborough Junior School has an information sharing agreement in place with Bedfordshire Police for Operation Encompass.

Hillborough Junior School will receive Missing Persons notifications should a child/young person go missing, in line with the addition to Operation Encompass.

12. Our Role in the Prevention of Abuse

In accordance with Working Together 2026, the school recognises the need to safeguard children/young people from abuse.

Appendix Three contains more information about definitions and indicators of abuse, specifically:

- neglect
- emotional abuse
- physical abuse
- sexual abuse

In addition, the school is alert to the need to safeguard children/young people in specific circumstances as defined within Keeping Children Safe in Education 2026.

Our safeguarding policy cannot be separated from the general ethos of the school, which should ensure that children/young people are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

13. The Curriculum

Hillborough Junior School acknowledge preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, racism, derogatory behaviour, faith-based prejudice or other forms of physical violence and sexual violence/harassment.

Hillborough Junior School has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE (we refer to this as Growing Up Education) delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Such a programme is fully inclusive and developed to be age and stage of development appropriate (especially in considering the needs of children/young people with SEND and other vulnerabilities).

Hillborough Junior School has regard for the new statutory guidance, Relationships Education, Relationships and Sex Education and Health Education Guidance.

This program will tackle, at an age-appropriate stage, issues such as:

- Supporting children to develop skills that form the building blocks of all positive relationships
- Healthy and respectful relationships
- Boundaries, consent and kindness in relationships
- Stereotyping, prejudice and equality
- Body confidence and self-esteem.
- How to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour
- The concepts of, and laws relating to all forms of sexual harassment and abuse and how to access support.
- What constitutes sexual harassment (this may include an online element which facilitates, threatens and/or encourages sexual violence) and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it.

14. Online Safety

Hillborough Junior School understands the importance of children being safeguarded from potentially harmful and inappropriate online material. Our whole school approach to online safety aims to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

We understand that online safety is considerable and ever evolving, but categorise into four areas of risk which inform our online safety policy:

- **Content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories. We use approaches from Educate Against Hate to tackle this important area.

- **Contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **Conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (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.

The Department for Education has published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely and explains how filtering and monitoring requirements apply to the use of generative AI in education.

Hillborough Junior School carries out a review of filtering and monitoring systems at least once a year. The review is carried out by the member of staff responsible for filtering and monitoring (and includes the DSL and the lead teacher for computing). The school ensures that checks test that filtering is working appropriately on all internet-connected devices in all relevant locations and a record of these checks is stored.

Mobile Phones

Hillborough Junior School is a mobile phone free environment by default; anything other than this is an exception only. The school has a separate Mobile-Phone Policy that prohibits the use of mobile-phones throughout the school day, including during lessons, breaktimes and lunchtimes. The school has due regard to the Mobile Phones in Schools guidance (DfE 2026).

Nudes and semi-nudes, including where generated by AI

Hillborough Junior School understands the importance of clear safeguarding terms. For the purpose of this guidance, ‘making or sharing nudes and semi-nudes, including AI-generated content’ refers to the creation, sharing, or posting of nude or semi-nude visual material by individuals under the age of 18. This includes photographs, videos and livestreams. The term ‘nudes’ is used because it is widely understood by young people. This policy applies to self-generated images, images created by others and material altered or generated via artificial intelligence (such as ‘deepfakes’).

15. Alternative Provision

Hillborough Junior School utilises alternative provision providers for children where required, and we understand that we maintain the responsibility for the safeguarding of that child. The school will utilise the Local Authority Approved Provider List when seeking alternative provision for a child. We will ensure the placement meets the child's needs. We will ensure we obtain written confirmation of the following:

- Information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff).
- Written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.
- Where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend.

Hillborough Junior School will regularly (at least half termly) review the alternative provision placements they make, to gain assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary.

Hillborough Junior School has due regard to the following statutory guidance:

- Arranging Alternative Provision (February 2025)
- Arranging education for children who cannot attend school because of health needs (December 2023)

Safeguarding in specific circumstances

16. Children/Young People who are vulnerable to extremism

- Hillborough Junior School seeks to protect children/young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Extreme Right Wing/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist Paramilitary groups, and extremist Animal Rights movements.

- In accordance with the Prevent Duty placed upon the school by the Counter Terrorism and Security Act 2015 we understand the specific need to safeguard children, young people and families from violent extremism**.** Hillborough Junior School is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

- Hillborough Junior School values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both children/young people and teachers have the right to speak freely and voice their opinions. However, free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Essential to this school are the fundamental British Values of Democracy, Rule of Law, Equality of Opportunity, Freedom of Speech and the rights of all women and men to live free from persecution of any kind and it would be expected that views and opinions expressed would be commensurate with these.

- Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix Six.

Risk reduction.

- The school governors, the Head Teacher and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RE curriculum, SEND policy, assembly policy, the use of school premises by external agencies, integration of children/young people by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

- In addition, the school Prevent Action Plan template may be used to demonstrate how the organisation is fulfilling the prevent duty. Please see Appendix Twelve.

- Hillborough Junior School have due regard for Terrorism (Protection of Premises) Act 2025 (otherwise known as Martyn's Law), and refer to the following guidance: Overarching Factsheet – GOV.UK. The Act received Royal Assent on 3 April 2025 and it is expected that the implementation period will be at least 24 months.

- In accordance with the Prevent Duty, David Bradshaw (Head Teacher) is the Single Point of Contact (SPoC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.

- When any member of staff has concerns that a child/young person may be at risk of radicalisation or involvement in terrorism, they should speak with the SPoC and to the DSL if this is not the same person. Concerns must be recorded on the school's CPOMS.

- If a child/young person is thought to be at risk of radicalisation, a referral will be made using

the National Prevent Referral Form which shall be sent directly to the Police.

- Initial advice regarding Prevent related concerns or whether to submit a referral will be sought from Bedfordshire Police by emailing Prevent@beds.police.uk.

- Completed National Referral Forms should be emailed to preventreferrals@beds.police.uk

- In all cases, in accordance with advice provided by Bedfordshire Police, the school will ensure appropriate interventions are secured which are in line with local procedures in order to safeguard children/young people assessed as being vulnerable to radicalisation.

- If the school are concerned that a child/young person may be at risk of significant harm in relation to radicalisation or involvement in violent extremism, a child protection referral will be made to Children's Social Care.

17. Female Genital Mutilation (FGM) / Forced Marriage / Modern Day Slavery

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It can be known as female circumcision or female genital cutting and is often carried out for cultural, religious and social reasons within families and communities.

- FGM is illegal in the UK and it's also illegal to take a British national or permanent resident abroad for FGM or help someone trying to do this.

- Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** (along with social workers and healthcare professionals) **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. This is in addition to following the school's safeguarding reporting procedures. A teacher means any person within the Education Act 2002 (section 141A(1)) employed or engaged to carry out teaching work at schools or other institutions.

- Those failing to report such cases will face disciplinary sanctions.

- If the school are concerned that a child/young person has experienced or is at risk of FGM, a Child Protection referral will be made to Multi Agency Safeguarding Hub (MASH) in accordance with interagency procedures produced by the LSCP. In addition, all teachers will follow mandatory reporting duties. Please refer to One Minute Guide FGM.

(Further information regarding FGM can be found in Appendix Seven)

- A forced marriage is where one or both people do not (or in cases of people with learning disabilities cannot), consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

- The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they are bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

- The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry - this includes:
    - taking someone overseas to force them to marry (whether or not the forced marriage takes place)
    - marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
    - breaching a Forced Marriage Protection Order.

- Further multi-agency statutory guidance for dealing with forced marriage can be found here The right to choose: government guidance on forced marriage.

- Modern Day Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the definition of which comes from the Palermo Protocol). Modern Day Slavery crimes include holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

- Although human trafficking often involves an international cross-border element, it is also possible to be a victim of Modern-Day Slavery within your own country.

Types of human trafficking

There are several broad categories of exploitation linked to human trafficking, including:

- Sexual exploitation
- Forced labour
- Domestic servitude
- Organ harvesting
- Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc.

- Forced marriage and illegal adoption (if other constituent elements are present).

18. Child on Child abuse (including harassment and violence)

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children/young people outside of these environments.

All staff, but especially the DSL (and deputies) should consider whether children/young people are at risk of exploitation or abuse outside of 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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse – including physical, sexual, emotional abuse and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation. This can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and, in the worst-case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

- Hillborough Junior School recognises that children/young people can abuse each other, and such behaviours are never viewed simply as 'banter' or as part of growing up. All staff recognise it is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.
- We recognise that child on child abuse can take many different forms such as:
    - Cyber-bullying
    - Sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet by persons aged under 18 (referred to as Youth Produced Sexual Imagery)
    - Sexual assault
    - Sexual violence or harassment
    - Upskirting
    - Sexually harmful or problematic behaviour
    - Gang initiation or hazing type violence
    - Harassing messages and misogynistic messages
    - The non-consensual sharing of nudes and semi-nudes
    - The sharing of abusive images and pornography, to those who do not want to receive such content
    - The exploitation of others, linked youth produced images
    - Discriminatory behaviour, including racism, faith targeted abuse and other prejudice-based incident
- Upskirting is an illegal offence which typically involves taking a picture under a person's

clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. All staff should be alert to when children might be at the highest risk during the school day (e.g. immediately after school)

- Hillborough Junior School understands serious violence and signals that children/young people are at risk from or are involved in serious violent crime. Indicators may include increased absences, a change in friendships/relationships with older individuals or groups, a significant decline in performance, self-harm, significant change in wellbeing or signs of assaulted/unexplained injuries. Unexplained gifts or new possessions could indicate that children/young people have been appropriated, or are involved with, individuals associated with criminal networks or gangs.

- All staff recognise that early, evidence-based support for those considered at risk of serious violence is vital. This includes access to trusted adults, social and emotional skill support and, where available, targeted interventions such as mentoring or therapeutic support. Guidance can be accessed via Youth Endowment Fund (YEF) where appropriate

- Contextual safeguarding/extra familial risk as referenced in KCSIE (2026) highlights that '*assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process'.*
- Contextual safeguarding can also be known as *'risk outside the home' (Working Together, 2026)*

- Hillborough Junior School has a thorough understanding of contextual safeguarding and will make a referral in the first instance if apparent.

- Hillborough Junior School has adopted a Child-on-Child Abuse Policy which outlines the actions school will take in responding to reports of Child-on-child abuse.

- Hillborough Junior School manages the use of mobile and smart technology on the premises and reflects this in the behaviour/child protection policy.

- We carry out an annual review of our approach to online safety, filtering and monitoring supported by an annual risk assessment that considers the risks to children/young people.

'Report Abuse in Education' (NSPCC helpline) is still available. Young people and adults can contact the NSPCC helpline, Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk

19. Sexualised behaviours

- Where children/young people display sexualised behaviours, the behaviours will be considered in accordance with the children/young person's developmental understanding, age and impact on the alleged victim. Tools such as Brook Traffic Light Tool may be used to assist in determining whether the behaviour is developmental or a cause for concern. This will assist in ensuring the child(ren)/young people receive the right support at the right time either via universal services and community-based early help, or a referral to Children's Social Care/the targeted early help level of Family Help.

- Hillborough Junior School follows Keeping Children Safe in Education (DfE,2026) when responding to such issues alongside local interagency procedures. This includes responding to any reports in a child-centred manner and undertaking an immediate risk and needs assessment in relation to the victim, the alleged perpetrator and other children/young people.

- The Lucy Faithfull Foundation has developed a HSB Toolkit, which amongst other things, provides support, advice and information on how to prevent Harmful Sexual Behaviour, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.

- We will seek specialist advice, guidance and assessment and will work with partner agencies in relation to management of information and what should be shared with staff, parents and carers.

- All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

- In all cases of child on child abuse the school will consider the vulnerability of all children/young people including those alleged to have caused the harm and those alleged to be victims and provide a safeguarding response. Consideration will be given to violence in young people's relationships.

- Where necessary, the school's Behaviour and Child-on-Child Abuse policy will be invoked, and any sanctions applied will be consistent with these procedures.

- Where issues indicate that a criminal offence may have been committed, a report will be made to Bedfordshire Police.

20. Gang related violence (Contextual/Extra Familial Risk)

- Hillborough Junior School recognises the risks posed to children/young people in relation to involvement in gang related activity, which may be street gangs, peer group or organised crime. Children/young people who are involved in gangs are more likely to suffer harm themselves, through retaliatory violence, displaced retaliation, and territorial violence with other gangs or other harm suffered whilst committing a crime. In addition, children/young people may experience violence as part of an initiation or hazing practice.

- All staff recognise that harm can be committed or facilitated by an organised network or gang and children may identify as part of one of these groups. Children are not always recognised as victims and can be criminalized for actions they take while under coercion. This may constitute modern slavery.

- The school understands that Early Help can be crucial in the early identification of children/young people who may need additional support due to gang related activity and as such will provide an Early Help response, including referral when concerns are raised about indicators of gang activity.

- If, however, information suggests a child/young person may be at risk of significant harm due to gang related activity, a referral will be made to Children's Social Care.

- Where there are concerns that a child/young person may be, or is at risk of, becoming involved in gang related activity, a referral will be made to the Serious Youth Violence Panel in accordance with local procedures as part of the safeguarding response.

- Serious violence is an ongoing safeguarding concern and may involve physical assault, the carrying or use of weapons and potential criminal exploitation.

- All staff understand that concerns regarding a child carrying, using or intending to use a weapon should be reported to the DSL, who should carry out a risk assessment.

- Hillborough Junior School understands the process of completing a multi-agency information sharing form which highlights broader concerns contextually occurring outside of the child/young person's home.

- See Appendix Nine for further information on risk indicators for gang involvement.

21. Youth Generated Sexualised Imagery

- Hillborough Junior School recognises the impact of online social communication and the issue of sending or posting consensual or non-consensual sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet. We pay due regard to the Guidance issued by the UK Council for Child Internet Safety in relation to how we respond to incidents. Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024)

- In all cases where an incident of youth produced sexual imagery is reported, the following actions will be undertaken:

    - The incident should be reported to the DSL as soon as possible.
    - The DSL should hold an initial review discussion or meeting with appropriate school staff.
    - There should be subsequent interviews with the child(ren)/young people involved (if appropriate)
    - Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child/young person at risk of harm.
    - At any point in the process if there is a concern a child/young person has been harmed or is at risk of harm a referral should be made to Children's Social Care and/or Bedfordshire Police immediately.

- An immediate referral will be made to Bedfordshire Police and Children's Social Care in the following circumstances:

    - The incident involves an adult.
    - There is reason to believe that a child/young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
    - The imagery suggests the content depicts sexual acts which are unusual for the child/young person's developmental stage, or are violent.
    - The imagery involves sexual acts and any pupil in the imagery is under 13.
    - There is reason to believe a child/young person is at immediate risk of harm owing to the sharing of the imagery, for example, the child/young person is presenting as suicidal or self-harming.

- If none of the above applies, the school may choose to deal with the incident without involving Bedfordshire Police or Children's Social Care. This will usually be the case where the DSL is confident that they have enough information to assess the risks to the pupils involved and the risks can be managed within the school pastoral support and disciplinary

framework. All decisions and rationale for decision making will be recorded. All decisions will be based on the best interests of the child/ren/young person.

- The school will pay due regard to the Department for Education guidance: Searching, Screening and Confiscation advice.

- Adults in the school will not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible the DSL will respond to an incident based on what they have been told about the imagery.

- All incidents will be recorded.

More information is available in Appendix Eight.

22. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of imbalance in power to coerce, manipulate or deceive a child/young person into taking part in sexual or criminal activity. Whilst age may be the most obvious factor, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. This abuse can be perpetrated by individuals or groups, males or females and children/young people or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and maybe accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

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

All staff will be aware that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

The school will have procedures in place in managing poor school attendance and this will need to be regularly reviewed.

Child sexual exploitation can occur through use of technology without the child/young person's immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child/young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

- The school recognises that both boys and girls can be vulnerable to Child Sexual Exploitation and as such ensure staff are alert to signs and indicators.

- The school recognises that there are various 'models' of CSE which include but not limited to:
    - gangs and groups
    - boyfriend/girlfriend model
    - child on child
    - familial
    - online
    - abuse of authority

- Where concerns are identified in relation to Child Sexual Exploitation the Pan Bedfordshire – Effective Support Meeting the Needs of Children Guidance will be consulted in order to ensure the child/young person receives support at the earliest possible opportunity.

- An Early Help multi-agency response may be initiated from the school as the lead practitioner by completing a Multi-Agency Safeguarding Hub (MASH) referral.

- If a child/young person is thought to be at risk of significant harm through child sexual exploitation a referral will be made to Children's Social Care.

- Advice will be sought to establish if a National Referral Mechanism is appropriate.

- In all cases, intelligence/information will be shared with Bedfordshire Police using the Multi-Agency Information Sharing Form.

- Resources for education settings – CSA Centre will be utilised to strengthen our approach to Child Sexual Abuse.

23. Further guidance

Further guidance in relation to safeguarding children/young people in specific circumstances can be found on the Bedford Borough, Central Bedfordshire & Luton Safeguarding Children Partnerships Procedures (Contents)

Other Safeguarding Concerns

24. Mental Health

- All staff are aware that mental health problems can, in some cases, be an indicator that a child/young person has suffered or is at risk of suffering abuse, neglect or exploitation or can develop into safeguarding concerns.

- Only appropriately trained practitioners should attempt to make a diagnosis of a mental health problem. However, staff will observe children/young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

- Where children/young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these experiences can impact on children/young people's mental health, behaviour and education.

- Hillborough Junior School should make sure that any mental health support or interventions they offer are evidenced as safe, effective and appropriate for the need and phase of education.

- If staff have a mental health concern about a child/young person that is also a safeguarding concern, immediate action will be taken following the child protection policy including discussion with the DSL or Deputy. The DSL will liaise with the Senior Mental Health Lead, or Mental Health Support Team, where the safeguarding concern is linked to mental health.

- The school will access a range of advice to help them identify children/young people in need of extra mental health support. This includes working with external agencies as described in Promoting and Supporting mental health and wellbeing in schools and colleges

25. Homelessness

- Hillborough Junior School recognises that being homeless or being at risk of becoming homeless presents a real risk to a child/young person's welfare.

- The DSL (and any deputies) are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

- Hillborough Junior School recognises that whilst in most cases school and college staff will be considering homelessness in the context of children/young people who live with their families, 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 young people and the DSL (or a deputy) should ensure appropriate referrals are made based on their circumstances.

- Staff are aware of the indicators that a family may be at risk of homelessness, to include: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

- Referrals and/or discussion with the Local Housing Authority will be progressed as appropriate but will not replace a referral into Children's Social Care where a child/young person has been harmed or is at risk of harm.

- The Local Authority has a legal duty to address concerns under the Homelessness Reduction Act 2017. The focus is early intervention and to encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

26. Domestic Abuse

- All staff are aware of The Domestic Abuse Act 2021 which introduced the first statutory definition of domestic abuse and recognises that children/young people can be victims of domestic abuse; they may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (as below). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

- Staff will continue to develop their understanding of domestic abuse, and how all children/young people can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

- Staff are aware exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children/young people. In some cases, a child/young person may blame themselves for the abuse or may have had to leave the family home as a result.

- Hillborough Junior School recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can

include emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse.

- Staff understand that anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

- Types of domestic abuse include intimate partner violence, abuse by ex-partners, family. members, teenage relationship abuse and adolescent to parent violence.

- Young people 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/young person under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

- Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

27. 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 a school's computer network to look for test paper answers or change grades awarded;
    - Denial of Service (Dos or DDoS) attacks or 'booting'- attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources;
    - Making, supplying or obtaining malware such as viruses, with the intent to commit further offences.

- Children/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 child/young person in this area, the DSL (or deputy), should consider referring to the **Cyber Choices** programme.

- Cyber Choices is a nationwide police programme supported by the Home Office and led by the National Crime Agency which aims to intervene where children/young people are at risk of committing, or being drawn into, low level cyber-dependent offences.

- Additional advice can be found at: Cyber Choices

28. Children with additional needs

- Hillborough Junior School recognises that while all children/young people have a right to be safe, some children/young people may be more vulnerable to abuse, for example a young carer, a child/young person frequently missing from home/care, children/young people with disabilities or special educational needs, a child/young person living with domestic abuse, parental mental ill health or substance abuse, or a child/young person who has returned home to their family from care.

- The school should be alert to the needs of young carers and recognise that caring responsibilities can impact attendance, attainment, behaviour and wellbeing. Early identification is key to making sure young carers receive support at the right time from the right services.

- We recognise that additional barriers can exist when recognising abuse and neglect in children/young people with special educational needs or disabilities, medical or physical health conditions.

- These can include:
    - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child/young person's condition without further exploration.
    - Children/young people that are more prone to peer group isolation or bullying (including prejudice-based bullying) than other children/young people.
    - The potential for children/young people with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
    - Communication barriers and difficulties in managing or reporting these challenges.
    - Cognitive understanding – being unable to understand the difference between fact

and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

- Any reports of abuse involving children/young people with SEND will therefore require close liaison with the DSL (or deputy) and the SENCO or the named person with oversight for SEND.

- Hillborough Junior School will consider extra pastoral support and attention for these children/young people, along with ensuring any appropriate support for communication is in place.

- If Hillborough Junior School is considering permanently excluding or suspending a vulnerable child/young person and/or a child/young person who is the subject of a child protection plan or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude or suspend.

- Where a parent/carer has expressed their intention to remove a child/young person from school with a view to educating at home, we work together with Local Authority and other key practitioners to coordinate a meeting with parents/carers where possible. We will do this before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child/young person. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

- In the event of a one-off serious incident resulting in an immediate decision to exclude, a risk assessment *must* be completed prior to convening a meeting of the Governing Body.

29. Children/Young People who are lesbian, gay, bisexual, transsexual (LGBT) or gender questioning

- Hillborough Junior School recognises that whilst the fact that a child/young person may be LGBT is not in itself an inherent risk factor for harm, children/young people who are LGBT can be targeted by other children/young people.

- A child/young person who is perceived by other children/young people to be LGBT (whether they are or not) can be just as vulnerable as those who identify as LGBT.

- Hillborough Junior School will endeavour to reduce barriers faced by children/young people who are LGBT and will provide a safe space for them to speak out or share their concerns with members of staff. *This safe space is The Family Room.*

- The thoughts and feelings of children who are questioning their gender are understood and

staff should be professionally curious about the child's experiences, including potential vulnerabilities.

- Staff recognise that they should not adopt any changes related to social transition unless a decision has been made by the school following involvement from the child's parents or carers.

- Decision-making processes around requests for support with social transition are documented and records are kept. Hillborough Junior School considers whether pupils would be best supported by a policy on social transition which explains the steps the school would take, as outlined in Keeping Children Safe in Education 2026.

- The school understands the legal responsibility required to record a child's biological sex accurately wherever it is recorded. Schools should make sure that all relevant staff are aware of the child's biological sex.

30. What we do when we are concerned about a child/young person.

- All concerns will be viewed alongside Pan Bedfordshire – Effective Support Meeting the Needs of Children Guidance in order to ensure the appropriate support or intervention is provided at the earliest opportunity in the least intrusive way.

- The school also places due regard to the guidance contained in 'What to do if you are worried a child is being abused', 2015.

- If, in consultation with the Pan Bedfordshire – Effective Support Meeting the Needs of Children Guidance , the level of concern sits at Level 2 then support will be provided by the school as the Lead Practitioner. If, in consultation with Pan Bedfordshire – Effective Support Meeting the Needs of Children Guidance, the concern sits at a Level 3 or 4 a referral will be made into the MASH. Additional support or advice for this work may be sought from the MASH as a multi-agency response.

- In cases where it is not possible to obtain consent from the parent/carer, the school will seek advice from the Multi Agency Safeguarding Hub (MASH).

- The school will review each case to ensure that any support or intervention provided has impacted positively on the welfare/safety of the child/young person and that improvement is sustained.

- In the event that provision of support has not led to improvements for the child/young person, or concerns escalate, the school will follow the step-up Escalation procedures

published by the Luton Safeguarding Children Partnership (LSCP).

- In consultation with the Pan Bedfordshire – Effective Support Meeting the Needs of Children Guidance, if the concerns about the child/young person indicate that they may be at risk of or suffering significant harm a referral will be made to the Multi Agency Safeguarding Hub (MASH).

- The parent/carer will be informed of the referral unless informing the parent may place the child/young person at increased risk of harm.

- In the event of a professional disagreement in relation to a specific concern, the school will follow the Escalation procedures.

31. Involving parents/carers

- In general, we will discuss any safeguarding and child protection concerns with parents / carers before approaching other agencies and will seek their consent to making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the DSL. However, there may be occasions when the school will contact another agency **before** informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child/young person.

- Parents / carers will be informed about the safeguarding policy through the school website. A paper copy may be requested at the school reception.

32. Multi-agency work

- The school understands its role in the Luton Safeguarding Children Partnership (LSCP). Governing bodies, proprietors and the senior leadership teams, especially the DSLs, will make themselves aware of and follow their local arrangements.

- Hillborough Junior School works in partnership with other agencies in the best interests of children/young people. This includes effective information sharing, joint decision making and coordination interventions, to facilitate effective help, support and protection. The school will, where necessary, liaise with the school nurse, initiate an effective support response, and make referrals to Children's Social Care. Referrals and contacts should be made by the DSL or one of the Deputy Leads to MASH/Children's Social Care. Where the child/young person already has a social worker, the request for a service will go immediately to the social worker involved, or in their absence to their team manager or duty social worker.

- All staff recognise that some children and families may require more targeted support than that offered at the universal and community-based Early Help level. The Families

First Partnership (FFP) Programme Guide provides a toolkit to assist safeguarding partners in setting up effective Family Help models to identify children and families who would benefit from more targeted support through Family Help. Hillborough Junior School has reviewed and understands its duties to support families with both targeted help and support and services under s.17 of the Children's Act 1989.

- We will co-operate with any child protection enquiries conducted by Children's Social Care: The school will ensure representation at appropriate inter-agency meetings such as Team Around the Family/Strategy meetings, Initial and Review Child Protection Conferences, together with core group meetings.

- We will provide reports as required for these meetings in accordance with the LSCP interagency procedures. If the school is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents/carers at least 24 hours prior to the meeting.

- Where a child is subject to an Inter-agency Child Protection Plan, Child in Need Plan or TAF Support Plan, the school will contribute to the preparation, implementation and review of the plan as appropriate.

- We understand that qualified lead practitioners who are not social workers can lead work with families up to and including s.17 and this includes schools.

- If a child is subject to a referral to a multi- panel such as Multi Agency Risk Assessment Conference (MARAC) or CHANNEL Panel, the school will contribute to such arrangements.

33. Responding to an allegation or concern about a member of staff

- The school will comply with the LSCP procedures for Allegations and Concerns regarding Staff, Carers and Volunteers Working with Children and Young People in all circumstances.

- These procedures should be used in any case in which it is alleged that a member of staff (including supply staff, trainee teachers, volunteers and contractors), governor or visiting professional has:

    - Behaved in a way that has harmed or may have harmed a child/young person.
    - Possibly committed a criminal offence against or related to a child/young person; or
    - Behaved in a way that indicates s/he may pose a risk of harm to children/young people.
    - Behaved in a way that indicates they may not be suitable to work with children/young people.

- We will consult with the LADO when an allegation is made against a member of staff to

agree how to progress this.

- Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse or mistreat children/young people.

- All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children/young people **immediately.**

- Allegations or concerns about colleagues and visitors must be reported directly to the Head Teacher unless the concern relates to the Head Teacher. If the concern relates to the Head Teacher, it must be reported immediately to the Chair of Governors. Alternatively, concerns can be reported directly to the Local Authority Designated Officer (LADO) in Children's Social Care, who will liaise with the Chair of Governors, and they will decide on any action required.

- Schools should follow their safeguarding policies and procedure in the event of an allegation regarding an "incident that happened when an individual or an organisation was using their school premises for the purposes of running activities for children/young people." This includes events such as community groups, sports associations, and more.

- If the Head Teacher is not available, the member of staff should report their concerns to the most senior member of staff available who will make contact with the LADO and discuss the concerns.

- Contact with the LADO should happen at the earliest possible opportunity and within 1 working day.

  The LADO in Luton can be contacted at lado@luton.gov.uk

- The LADO may request a referral - if this is requested, the referral will be completed and submitted within 1 working day.

- The school will engage with the LADO at all stages of the management of the allegation/concern and comply with the statutory guidance contained within Keeping Children Safe in Education 2026 and the local procedures published by Safeguarding Children- Luton.

- In this regard, the school will consider whether it is necessary to suspend the member of staff while the allegation or concern is investigated, however all reasonable alternatives to manage the risk will be considered.

- Due consideration will be given to the view of the LADO in relation to suspension or in-work safeguards while a matter is investigated.

- Should the school dismiss a member of staff/volunteer as a result of a substantiated

allegation or should a member of staff/volunteer resign before an investigation has been completed, in accordance with statutory duty, a referral to the Disclosure and Barring Service will be made.

- If the member of staff is engaged in teaching work, the school will, in accordance with published guidance from the Department for Education, consider whether a referral to the Teaching Regulation Agency (TRA) should be made.

- The school will adhere to the statutory guidance contained within Keeping Children Safe in Education 2026 with regard to record keeping, references and compromise or settlement agreements.

- If an allegation is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per the school's behaviour policy.

- The school has appropriate policies and processes in place to manage and record any such concerns that do not meet the harm threshold and take appropriate action to safeguard children/young people. (Please see Appendix Five for more information).
- If a member of staff, student or volunteer has any concerns about poor, unsafe practice, or failures of the safeguarding regime, they are encouraged to raise this with the Head Teacher, Senior Leadership Team or Governing Body, following the Whistle Blowing Procedures of the school.

- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email help@nspcc.org.uk.

APPENDICES

Appendix One: The Designated Safeguarding Lead will:

- Support staff who make referrals to the Local Authority Children's Social Care and act as a source of support, advice and expertise for all staff.
- Refer cases to the Police where a crime may have been committed.
- Inform Head Teacher of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Be aware of the requirement for children to have an Appropriate Adult. Further information can be found in the statutory guidance – PACE Code C 2019.
- Seek advice in regard to safeguarding matters related to radicalisation and make referrals to Channel as required.
- Liaise with the Designated Senior Manager for allegations to ensure where necessary referrals have been made to the Disclosure and Barring Service when a person is dismissed or resigned due to risk/harm to a child.
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Lead regular case monitoring reviews of vulnerable children. These reviews, together with any actions arising from the review and the rationale for decision-making will be recorded in case files.
- Ensure safeguarding and child protection information will be dealt with in a confidential manner and in accordance with Safeguarding Children – Luton Borough Council.
- Ensure staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual child/young person and/or family.
- Ensure a written record will be made of what information has been shared with whom, and when.
- Ensure that child protection files are kept up to date.
- Ensure rationale for making decisions in recorded (including decision not to make a referral).

- Ensure safeguarding and child protection records will be stored securely in a central place separate from academic records.

- Ensure individual files will be kept for each child/young person: the school will not keep family files.

- Ensure access to safeguarding and child protection records by staff other than by the DSL will be restricted, and a written record kept of who has had access to them and when.

- Ensure parents are usually (subject to the point below) aware of information held on their children and are kept up to date regarding any concerns or developments by the appropriate members of staff.

- Ensure general communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility.

- During term time the DSL (or a deputy) should always be available during school hours for staff in school to discuss any safeguarding concerns. Whilst the DSL (or a deputy) would be expected to be available in person, it is a matter for individual schools and the DSL to arrange adequate and appropriate cover arrangements for any out of hour/out of term activities.

Appendix Two: Roles and responsibilities of the Governing Board

The governing body/equivalent will ensure that:

- The school contribute to inter-agency working in line with statutory guidance Working Together to Safeguard Children 2026 - this includes providing a co-ordinated offer of targeted early help services when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans

- The school provides an appropriate safeguarding response in order to safeguard children/young people.

- Online safety is a running and interrelated theme whilst devising and implementing the whole school approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety, filtering and monitoring whilst planning the curriculum, any teacher training, the role and responsibilities of the DSL (and Deputies) and any parental engagement.

- The school pays due regard to the need to safeguard children in specific circumstances such as Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), vulnerability to radicalisation, Female Genital Mutilation (FGM) or child on child abuse which can include gang related violence, cyberbullying, sexually harmful behaviours, sexual violence, sexual harassment (this may include an online element which facilitates, threatens and/or encourages sexual violence), upskirting or youth produced sexual imagery.

- The child protection policy reflects and addresses additional challenges that exist for those children/young people with special educational needs and disabilities and physical and mental health needs, and the school should consider extra pastoral support and attention for these children/young people, along with ensuring any appropriate support for communication is in place.

- The school maintains information about the legal status of all children/young people including whether a looked after child is subject to S20 voluntary agreements, interim or full care order, contact details for persons with parental responsibility, level of delegated authority, details of the social worker and the virtual head in the authority that looks after the child/young person.

- There is a designated teacher with the appropriate training skills and knowledge appointed to work with the virtual school head to promote the academic achievement of looked after children and children previously looked after.

- The school's safeguarding arrangements take into account the procedures and practice of the Local Authority as part of the inter- procedures, set up by the Luton Safeguarding Children Partnership. This includes working with Children's Social Care from other areas when children attend school in Luton Borough however live outside of Luton.

- The school shares information with other practitioners in the interests of safeguarding children/young people in accordance with the guidance within Working Together to Safeguard Children 2026 and Information Sharing, 2024

- They recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that clearly set out the processes and principles for sharing information within the school and with Children's Social Care, the safeguarding partners, other organisations, agencies, and practitioners as required.

- That School staff be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority Children's Social Care.

- They are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

- Relevant staff have due regard to the relevant data protection principles.

- The school initiates appropriate safeguarding responses to children/young people who are missing or have unexplainable and/or persistent absences from education, to help identify the risk of abuse and neglect including sexual abuse, exploitation or radicalisation and to help prevent the risks of their going missing in future.

- The Head Teacher ensures that safeguarding policies and procedures which have been adopted by the Governing Body are consistently implemented.

- The school has a staff behaviour policy (sometimes called the code of conduct) which should amongst other things include - staff/child relationships and communications including the use of social media and other online platforms, low level concerns.

- The school has procedures for managing **any** allegations and concerns about adults that

work or volunteer with children/young people, that **may** or **may not** meet the harm threshold and that these include the procedures for making referrals to the Disclosure and Barring Service and Teacher Regulation Agency where appropriate.

- The school operates “safer recruitment” procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers in accordance with Keeping Children Safe in Education 2026.

- The DSL is a member of the Senior Leadership Team and has lead responsibility for safeguarding which is not delegated - this is clearly defined within the role holder’s job description and that this person has the appropriate authority, time, training, funding and resources to undertake this role as per Appendix C Keeping Children Safe in Education 2026.

- The DSL maintains management oversight of any work undertaken by the Deputy DSL.

- Any Deputy DSL has the appropriate training skills and knowledge to undertake the operational function of the DSL as per appendix C of Keeping Children Safe in Education 2026.

- The DSL and any deputies undertake Pan Bedfordshire Safeguarding Children Partnership’s higher level training to ensure they have the appropriate training, skills and knowledge to carry out this role.

- In addition, the DSL and any Deputies will update their knowledge by receiving safeguarding updates via the DSL forums, cluster meetings, attendance at training and learning events offered by the Luton Safeguarding Children Partnership, online updates via NSPCC or attendance at professional development events.

- The Head Teacher and all other staff who work with children undertake safeguarding training in accordance with Keeping Children Safe in Education, 2026 and that they receive annual safeguarding updates to ensure their continued professional development.

- All Governors receive appropriate safeguarding and child protection (including online and filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be updated regularly on an annual basis.

- Training updates take account of the LSCP priorities, the local context, the needs of the pupils and other identified training needs.

- All training will incorporate safeguarding children in specific circumstances which includes,

but is not limited to: Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), vulnerability to radicalisation and child on child abuse.

- The training will ensure that child-on-child abuse is never seen as 'banter' or part of growing up and incorporates issues of sexually harmful behaviours such as sexual touching or assault and gang initiation or hazing type violence - the training recognises how alcohol use, drug use, truanting and youth generated sexualised imagery increases risks of harm to children/young people. In addition, the training will also ensure staff have the skills and knowledge about the additional vulnerability of Looked After Children.

- The school has appropriate safeguarding responses for children/young people who go missing from education which should include holding more than one emergency contact number for pupils.

- The school recognises that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

- Temporary staff and volunteers are made aware of the school's procedures for child protection and their responsibilities.

- The school remedies any deficiencies or weaknesses brought to its attention without delay and recognises the importance of utilising the expertise of the DSL and Deputies in shaping safeguarding arrangements.

- The school has appropriate filters and monitoring systems in place and regularly reviews their effectiveness.

- 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.

- Governing bodies should consider the age range and number of their children/young people, how often they access the IT system and the proportionality of costs versus safeguarding risks. Over blocking of material which could restrict children/young people's online learning will be avoided.

- The curriculum is delivered in such a way to include educating children/young people about how to stay safe which will include Relationship and Sex Education (RSE, known as Growing Up at Hillborough Junior School), online safety and broader safeguarding messages within PSHE.

- Children/young people are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children/young people, including those who are victims of

abuse, and with special educational needs or disabilities.

- The child/young person's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children/young people to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

- The governing body reviews the policies/procedures annually.

- A member of the governing body, usually the chair, is nominated to liaise with the Designated Officer(s) from the relevant local authority and partner agencies in the event of allegations of abuse made against the Head Teacher, the principal of a college or proprietor or member of the governing body of an independent school.

Appendix Three: Definitions and indicators of abuse

Abuse

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

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children/young people of all forms of domestic abuse.

Children/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.

Children/young people may be abused by an adult or adults or by another child(ren)/young person.

Neglect

Neglect is the persistent failure to meet a child/young person's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- constant hunger
- stealing, scavenging and/or hoarding food
- frequent tiredness or listlessness
- frequently dirty or unkempt
- often poorly or inappropriately clad for the weather

- poor school attendance or often late for school
- poor concentration

- affection or attention seeking behaviour
- illnesses or injuries that are left untreated
- failure to achieve developmental milestones, for example growth, weight
- failure to develop intellectually or socially
- responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- the child is regularly not collected or received from school
- the child is left at home alone or with an inappropriate carer.

Physical abuse

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- multiple bruises in clusters, or of uniform shape
- bruises that carry an imprint, such as a hand or a belt
- bite marks
- round burn marks
- multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- an injury that is not consistent with the account given
- changing or different accounts of how an injury occurred
- bald patches
- symptoms of drug or alcohol intoxication or poisoning
- unaccountable covering of limbs, even in hot weather

- fear of going home or parents being contacted
- fear of medical help
- fear of changing for PE

inexplicable fear of adults or over-compliance

violence or aggression towards others including bullying

isolation from peers.

Sexual abuse

Sexual abuse involves forcing, causing or enticing a child/young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child/young person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside 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 them in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women can also commit act of sexual abuse, as can other children/young people.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- sexually explicit play or behaviour or age-inappropriate knowledge
- anal or vaginal discharge, soreness or scratching
- reluctance to go home
- inability to concentrate, tiredness
- refusal to communicate
- thrush, persistent complaints of stomach disorders or pains
- eating disorders, for example anorexia nervosa and bulimia
- attention seeking behaviour, self-mutilation, substance abuse
- aggressive behaviour including sexual harassment or molestation
- unusual compliance
- regressive behaviour, enuresis, soiling
- frequent or open masturbation, touching others inappropriately
- depression, withdrawal, isolation from peer group

- reluctance to undress for PE or swimming
- bruises or scratches in the genital area

Sexual exploitation

Child sexual exploitation occurs when a child/young person, or another person, receives 'something' (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to Children's Social Care. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity).
- Entering and/or leaving vehicles driven by unknown adults.
- Possessing unexplained amounts of money, expensive clothes or other items.
- Frequenting areas known for risky activities.
- Being groomed or abused via the Internet and mobile technology
- Having unexplained contact with hotels, taxi companies or fast food outlets
  The Multi-Agency Information Submission Form will be used to share information with Bedfordshire Police that raise a concern around CSE and other forms of exploitation, etc.

Preventing Child Sexual Exploitation – The Children's Society is utilised by the school to support our approach to this area

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child/young person such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to children/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 child/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 children/young people. These may include interactions that are beyond the child/young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child/young person participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children/young people frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child/young person consistently describes themselves in very negative ways – as stupid, naughty, hopeless, ugly
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Behaviours such as rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia
- Soiling, smearing faeces, enuresis

N.B: Some situations where children/young people stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

Responses from parents

Research and experience indicate that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child/young person is said to have acted in a way that is inappropriate to their age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries

- A persistently negative attitude towards the child/young person
- Unrealistic expectations or constant complaints about the child/young person
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child/young person from home

- Violence between adults in the household

Disabled children/young people

When working with children/young people with disabilities, practitioners need to be aware those additional vulnerabilities to abuse and neglect such as:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child/young person's disability without further exploration
- Being more prone to peer group isolation or bullying than other children
- Children//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 Possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child/young person such as the shin, might be of concern on a non-mobile child/young person
- Not getting enough help with feeding leading to malnourishment
- Poor toileting
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child/young person's means of communication
- Ill-fitting equipment, for example calipers, sleep boards, inappropriate splinting
- Misappropriation of a child/young person's finances
- Inappropriate invasive procedures

Appendix Four: Dealing with a disclosure of abuse

When a child/young person tells me about abuse they have suffered, what must I remember?

- Stay calm!
- Do not communicate shock, anger or embarrassment.
- Reassure the child/young person.
- Tell them you are pleased that they have spoken to you.
- Never enter into a pact of secrecy with the child/young person.
- Assure them that you will try to help but let them know that you will have to tell other people in order to do this (state who this will be and why).
- Tell them that you believe them.
- Children/young people very rarely lie about abuse; but they may have tried to tell others and not been heard or believed.
- Tell the child/young person that it is not their fault.
- Encourage the child/young person to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the child/young person is trying to tell you.
- Praise the child/young person for telling you.
- Communicate that they have a right to be safe and protected.
- Do not tell the child/young person that what they have experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child/young person may retract what they have told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child/young person again who you are going to tell and why that person/people need to know.

- As soon as you can afterwards, make a detailed record of the conversation using the child/young person's own language – include any questions you may have asked.

- Do not add any opinions or interpretations.

NB. It is not the education staff's role to seek disclosures; their role is to observe that something might be wrong, ask about it, listen, be available and make time to talk.

The child/young person may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child/young person. It is important that staff determine how best to build trusted relationships with children/young people which facilitate communication.

Immediately afterwards

You must not deal with this yourself. Clear indications or a disclosure of abuse must be reported to Children's Social Care without delay, by the Head Teacher or the DSL.

Children/young people making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your DSL or Head Teacher.

Appendix Five: Allegations and concerns about a member of staff, governor or volunteer (including, supply teachers, trainee teachers and all contracted staff)

Inappropriate behaviour by staff/volunteers could take the following forms:

- **Physical**

  For example: the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or inappropriate physical handling.

- **Emotional**

  For example: intimidation; belittling; scapegoating; sarcasm; lack of respect for children/young people's rights; excessive and/or aggressive shouting; and attitudes that discriminate on the grounds of race, gender, disability or sexuality.

- **Sexual**

  For example: sexualised behaviour towards peers; sexual harassment; sexual communication including via social networking, email, text; grooming behaviour; and sexual assault and rape.

- **Neglect**

  For example: failing to act to protect a child(ren)/young people, failing to seek medical attention or failure to meet a child/young person's basic needs.

- **Behaviours which may pose a risk**

Some behaviours which may take place outside of the workplace could present a transferable risk in an employee's professional role working with or in the vicinity of children/young people. For example, an alleged perpetrator of domestic abuse, offences demonstrating a sexual interest in children/young people, abuse or neglect of their own children or behaviours that are incompatible with a professional role working with children/young people.

If a child/young person makes an allegation or raises a concern about a member of staff (including supply staff), governor, visitor or volunteer the Head Teacher should be informed immediately. If the allegation or concern falls within the following criteria, the LADO will be contacted at the earliest possible opportunity and within 1 working day:

- Behaved in a way that has harmed or may have harmed a child/young person.
- Possibly committed a criminal offence against or related to a child/young person.

- Behaved in a way that indicates they may pose a risk of harm to children/young people.

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people.

The Head Teacher will not carry out the investigation himself or interview pupils.

If a child/young person makes an allegation of physical abuse against an adult that works with children/young people and there are visible bruises, marks or injuries, or if a child/young person makes an allegation of sexual abuse against an adult that works with children/young people, child protection procedures will be followed and a referral made to Children's Social Care. The LADO will also be informed.

The Head Teacher must exercise, and be accountable for, their professional judgement on the action to be taken, as follows –

- If the actions of the member of staff are felt likely to fall within the scope of the Interagency Allegation Management Procedures (as stated in point 2), the Head Teacher will notify the Local Authority Designated Officer. The LADO will liaise with the Head Teacher and advise about actions to be taken which will be in accordance with the Interagency Allegation Management Procedures.

- If the Head Teacher is uncertain whether the concern or allegation falls within the scope of the Interagency Allegation Management Procedures, a consultation with the LADO will take place and the advice provided will be acted upon. This consultation and the advice offered will be recorded and held on file.

- Where an allegation has been made against the Head Teacher, then the Chair of the Governing Body takes on the role of liaising with the LADO team in determining the appropriate way forward. For details of this specific procedure see the section on Allegations against Staff and Volunteers.

Concerns that do not meet the harm threshold.

Our Governing Body has policies and processes to deal with concerns (including allegations) which do not meet the harm threshold.

We recognise that concerns may arise in several ways and from a number of sources, for example:

- Suspicion

- Complaint

- Disclosure made by a child, parent or other adult within or outside of the organisation

- As a result of vetting checks undertaken

Hillborough Junior School understand that the term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child/young person does not meet the threshold set out (as per KCSIE 2026, paragraph 430)

A low-level concern is any concern that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and

- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Hillborough Junior School has appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children/young people.

We understand that creating a culture in which **all** concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

As good practice our Governing Body will:

- Set out their low-level concerns policy within their staff code of conduct and safeguarding policies.
- Ensure procedures are implemented effectively.
- Ensure their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empower staff to share any low-level safeguarding concerns with the DSL (or a Deputy).
- Address unprofessional behaviour and support the individual to correct it at an early stage.
- Provide a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Help identify any weakness in the school safeguarding system.

- If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school’s low-level concerns policy.

- Low-level concerns about a member of staff will be reported to the DSL or Head Teacher.

- Where a low-level concern is raised about the DSL, it will be shared with the Head Teacher.

- Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or college, that concern will be shared with the DSL (or Deputy), and/or Head Teacher, and recorded in accordance with the school's low-level concern/staff code of conduct policy, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

- All low-level concerns will be recorded in writing. The record will include:
    - Details of the concern.
    - The context in which the concern arose.
    - Action taken.
    - The name of the individual sharing their concerns will also be noted, however if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

    - The Head Teacher will be the ultimate decision maker in respect of all low-level concerns and may consult with the DSL to take a more collaborative decision-making approach.

    - Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

    - Where a pattern of such behaviour is identified, Hillborough Junior School will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold, be referred to the LADO.

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

Appendix Six: Indicators of vulnerability to radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as (KCSiE 2026, page 157):
'Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.'

3. Extremism is defined by the Crown Prosecution Service as:
'The demonstration of unacceptable behaviour by using any means or medium to express views which:

   - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs.
   - Seek to provoke others to terrorist acts.
   - Encourage other serious criminal activity or seek to provoke others to serious criminal acts.
   - Foster hatred which might lead to inter-community violence in the UK.

4. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Children/young people may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

6. Indicators of vulnerability include:

   - Identity crisis – the child/young person is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
   - Personal crisis – the child/young person may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
   - Personal circumstances – migration; local community tensions; and events affecting the child/young person's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

- Unmet aspirations – the child/young person may have perceptions of injustice; a feeling of failure; rejection of civic life.

- Experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- Special educational needs – children/young people may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all children/young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and/or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

Appendix Seven: Safeguarding in Specific Circumstances: Female Genital Mutilation

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.

It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is child abuse. It's very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sexual intercourse, childbirth and mental health.

Effects of FGM

There are no health benefits to FGM, and it can cause serious harm, including:

- Constant pain
- Pain and/or difficulty having sex
- Repeated infections, which can lead to infertility
- Bleeding, cysts and abscesses
- Problems passing urine or incontinence
- Depression, flashbacks and self-harm
- Problems during labour and childbirth, which can be life-threatening for mother and baby

Some girls die from blood loss or infection as a direct result of the procedure.

Why FGM is carried out.

FGM is carried out for various cultural, religious and social reasons within families and communities in the mistaken belief that it will benefit the girl in some way (for example, as a preparation for marriage or to preserve her virginity).

However, there are no acceptable reasons that justify FGM. It's a harmful practice that isn't required by any religion and there are no religious texts that say it should be done. There are no health benefits of FGM.

FGM usually happens to girls whose mothers, grandmothers or extended female family members have had FGM themselves or if their father comes from a community where it's carried out.

Where FGM is carried out

Girls are sometimes taken abroad for FGM, but they may not be aware that this is the reason for their travel. Girls are more at risk of FGM being carried out during the summer holidays, as this allows more time for them to "heal" before they return to school.

Communities that perform FGM are found in many parts of Africa, the Middle East and Asia. Girls who were born in the UK or are resident here but whose families originate from an FGM practising community are at greater risk of FGM happening to them.

Communities at particular risk of FGM in the UK originate from:

Egypt	Yemen	Eritrea	Sudan	Oman
Ethiopia	Somalia	Gambia	Sierra Leone	Mali
Guinea	Nigeria	Indonesia	Saudi Arabia	Ivory Coast
Malaysia	Kenya	Iraqi Kurdistan	Liberia	

The law and FGM

FGM is illegal in the UK. It is a criminal offence to:

- perform FGM (including taking a child abroad for FGM);
- help a girl perform FGM on herself in or outside the UK;
- help anyone perform FGM in the UK;
- help anyone perform FGM outside the UK on a UK national or resident;
- fail to protect a girl for whom you are responsible from FGM.

Anyone who performs FGM can face up to 14 years in prison. Anyone found guilty of failing to protect a girl from FGM can face up to seven years in prison.

The Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers (along with social workers and healthcare professionals) 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.

Possible signs and indicators of FGM

A girl or woman who's had FGM may:

- have difficulty walking, sitting or standing;
- spend longer than normal in the bathroom or toilet;
- have unusual behaviour after an absence from school or college;
- be particularly reluctant to undergo normal medical examinations;
- ask for help but may not be explicit about the problem due to embarrassment or fear.

Below are some warning signs that MAY indicate a girl is at risk of FGM:

- Parents requesting additional periods of leave around school holiday times.
- If the girl comes from a country with a high prevalence of FGM.
- Mother and siblings have undergone FGM.
- Children may indicate that they are going for a special event (in the UK or abroad).

Further information can be obtained from:

https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation

Guidance on FGM Factsheet

Appendix Eight: Safeguarding in specific circumstances: Youth produced sexual imagery

Definition: *This advice uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos, or live streams by 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.*

Incidents covered by this policy:

- A person under 18 creates a sexual image of themselves and shares it with another person under 18.
- A person under 18 shares an image of another under 18 with another person under 18 or an adult.
- A person under 18 is in possession of sexual imagery created by another person under 18

Incidents not covered by this guidance:

- Under 18s sharing adult pornography
- Under 18s sharing sexual texts without sexual imagery
- Adults sharing sexual imagery of under 18s. (This is child sexual abuse and must always be reported to police.)

The Law

Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you're under 18.

Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- Nude or semi-nude sexual posing (e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear).
- Someone nude or semi-nude touching themselves in a sexual way.
- Any sexual activity involving a child.
- Someone hurting someone else sexually.
- Sexual activity that includes animals.

The term 'indecent images' also include pseudo-images which are computer-generated images that otherwise appear to be a photograph or video. These may be created using tools such as photo/video editing software, deepfake apps and generators (to combine and superimpose existing images or videos onto other images and videos), and AI text-to-image generators.

These laws were not created to criminalise children/young people but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and

exploration. We believe children/young people need education, support, and safeguarding, not criminalisation.

The National Police Chiefs Council has made clear that incidents of youth produced sexual imagery should be treated primarily as a safeguarding issue. However, the police may need to be involved in cases to ensure thorough investigation including collection of evidence. If a child/young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast any incidents with aggravating factors, for example, a child/young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to the police and/or Children's Social Care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police.

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's Social Care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks. When assessing the risks, the following should be considered:

- Why was the imagery shared?
- Was the child/young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery?
- Where has the imagery been shared?
- Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of the imagery?
- What is the impact on the young people involved?
- Do the child/young people involved have additional vulnerabilities?
- Does the child/young person understand consent?
- Has the child/young person taken part in this kind of activity before?

Informing parents/carers

Parents/carers should be informed and involved in the process at an early stage unless informing will put the child/young person at risk of harm. Any decision not to inform the parents/carers would

generally be made in conjunction with other services such as Children's Social Care and/or the police, who would take the lead in deciding when the parents/carers should be informed.

DSLs may work with the child/young people involved to decide on the best approach for informing parents. In some cases, DSLs may work to support the child/young person to inform their parents/carers themselves.

Searching devices, viewing and deleting imagery

Viewing the imagery

Adults should not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible, responses to incidents should be based on what DSLs have been told about the content of the imagery.

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 (i.e. it is not possible to establish the facts from the child(ren)/young people involved)
- Is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the child/young person or parent/carer in making a report
- Is unavoidable because a child/young person has presented an image directly to a staff member or the imagery has been found on a school device or network.

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

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Head Teacher.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Head Teacher.
- Ensure viewing takes place with another member of staff present in the room, ideally the Head Teacher or a member of the senior leadership team (this staff member does not need to view the images).
- Wherever possible, ensure viewing takes place on school or college premises, ideally in the Head Teacher or a member of the senior leadership team's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions and ensure the

safeguarding recording procedures for the school are followed.

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally

authorised by the Head Teacher can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If during a search a teacher finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of school discipline. They can also decide whether the material is of such seriousness that the police need to be involved.

Further details on searching, deleting and confiscating devices can be found in the DfE Searching, Screening and Confiscation advice (note this advice is for schools only)

Appendix Nine: Safeguarding in Specific Circumstances: Gang involvement

There are particular risk factors and triggers that children/young people experience in their lives that can lead to them becoming involved in gangs. Many of these risk factors are similar to involvement in other harmful activities such as youth offending or violent extremism.

Risk indicators may include:

- Becoming withdrawn from family.
- Sudden loss of interest in school - decline in attendance or academic achievement.
- Starting to use new or unknown slang words.
- Holding unexplained money or possessions.
- Staying out unusually late without reason.
- Sudden change in appearance - dressing in a particular style or ‘uniform’.
- Dropping out of positive activities.
- New nickname.
- Unexplained physical injuries.
- Graffiti style tags on possessions, school books, walls.
- Constantly talking about another child/young person who seems to have a lot of influence over them.
- Broken off with old friends and hanging around with a new group.
- Increased use of social networking sites.
- Starting to adopt codes of group behaviour e.g. ways of talking and hand signs.
- Expressing aggressive or intimidating views towards other groups of children/young people some of whom may have been friends in the past.
- Being scared when entering certain areas.
- Being concerned by the presence of unknown youths in their neighbourhood.

This is not an exhaustive list and should be used as a guide.

Appendix Ten: Safeguarding in Specific circumstances: Child Sexual Exploitation

Child sexual exploitation takes different forms - from a seemingly 'consensual' relationship where sex is exchanged for attention, affection, accommodation or gifts, to serious organised crime and child trafficking. Child sexual exploitation involves differing degrees of abusive activities, including coercion, intimidation or enticement, unwanted pressure from peers to have sex, sexual bullying (including cyber bullying), and grooming for sexual activity. There is increasing concern about the role of technology in sexual abuse, including social networking, internet sites and mobile phones. The key issue in relation to child sexual exploitation is the imbalance of power within the 'relationship'. The perpetrator always has power over the child/young person, increasing the dependence of them as the exploitative relationship develops.

Many children/young people are groomed into sexually exploitative relationships, but other forms of entry exist. Some children/young people are engaged in informal economies that incorporate the exchange of sex for rewards such as drugs, alcohol, money or gifts. Others exchange sex for accommodation or money as a result of homelessness and experiences of poverty. Some children/young people have been bullied and threatened into sexual activities by peers or gangs which is then used against them as a form of extortion and to keep them compliant.

The school recognises that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation

The key indicators of child sexual exploitation include:

Health-

- physical symptoms (bruising suggestive of either physical or sexual assault)
- chronic fatigue
- recurring or multiple sexually transmitted infections
- pregnancy and/or seeking an abortion
- evidence of drug, alcohol or other substance misuse
- sexually risky behaviour

Education-

- truancy/disengagement with education or considerable change in performance at school.

Emotional and Behavioural Issues-

- Volatile behaviour exhibiting an extreme array of mood swings or use of abusive language

- Involvement in petty crime such as shoplifting, stealing etc.
- Secretive behaviour

- Entering or leaving vehicles driven by unknown adults
- Reports of being seen in places known to be used for sexual exploitation, including public toilets known for ‘cottaging’ or adult venues (pubs and clubs)

Identity-

- Low self-image
- Low self-esteem
- Self-harming behaviour, e.g. cutting, overdosing
- Eating disorders
- Promiscuity

Relationships-

- Hostility in relationships with staff, family members as appropriate and significant others
- Physical aggression
- Placement breakdown
- Reports from reliable sources (e.g. family, friends or other professionals) suggesting the likelihood of involvement in sexual exploitation
- Detachment from age-appropriate activities
- Associating with other young people who are known to be sexually exploited
- Known to be sexually active
- Sexual relationship with a significantly older person, or younger person who is suspected of being abusive
- Unexplained relationships with older adults
- Possible inappropriate use of the Internet and forming relationships, particularly with adults, via the Internet
- Phone calls, text messages or letters from unknown adults

- Adults or older youths loitering outside the home
- Persistently missing, staying out overnight or returning late with no plausible explanation
- Returning after having been missing, looking well cared for in spite of having no known home base
- Missing for long periods, with no known home base

- Going missing and being found in areas where they have no known links

Please note: Whilst the focus is often on older men as perpetrators, younger men and women may also be involved and staff should be aware of this possibility.

Social Presentation-

- Change in appearance
- Going out dressed in clothing unusual for them (inappropriate for age, borrowing clothing from older young people)

Family and Environmental Factors-

- History of physical, sexual, and/or emotional abuse; neglect; domestic violence; parental difficulties

Housing -

- Pattern of previous street homelessness;
- Having keys to premises other than those known about

Income-

- Possession of large amounts of money with no plausible explanation
- Acquisition of expensive clothes, mobile phones or other possessions without plausible explanation
- Accounts of social activities with no plausible explanation of the source of necessary funding

This list is not exhaustive.

Appendix Eleven: Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children/young people's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.
https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

This HM Government advice is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces risk of harm to children/young people and promotes their well-being.

This guidance does not deal with arrangements for bulk or pre-agreed sharing of personal information between IT systems or organisations other than to explain their role in effective information governance.

The Data Protection Act 2018 and General Data Protection Regulations (GDPR) **do not** prevent the sharing of information for the purposes of keeping children/young people safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the DSL or a Deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children/young people.'

Further guidance can be found at:

Pan Bedfordshire Practitioner's Guide to Information Sharing to Safeguard Children & Young People

Information Sharing

Appendix Twelve - Prevent in Education Risk Assessment and Practice Action Plan

	YES	NO	Existing Controls	Further Action	Staff responsible	Due Date
Does your Safeguarding Policy make explicit that the school sees protection from radicalisation and extremist narratives as a safeguarding issue?	□		Our Safeguarding Policy makes explicit that the school sees protection from radicalisation and extremist narratives as a safeguarding issue under section 14 – Children who are susceptible to extremism and Appendix 6 – Indicators of Susceptibility to Radicalisation.	Review this section if there are updates to local and national procedures.	DB	Policy to be reviewed annually
Is the lead contact for Prevent responsibilities clearly identified in the policy?	□					
DSL/ Prevent Single Point of Contact SPOC	□		David Bradshaw/Penny Whelan	David Bradshaw is also the DSL. Provide further training for another Senior lead to take a lead role on Prevent.	DB	July 2025
Governor Safeguarding Lead	□		Robin Cowan/Ruth Deacon			
Does SG policy make explicit how PREVENT concerns should be reported within school?	□		The Policy states how PREVENT concerns should be reported within school-to the SPOC and further using the national referral process if required.	Staff to be made aware of the Notice-Check –Share flow chart. Displayed in staff room	DB	At least Annually

Fundamental British Values are considered in curriculum planning	□		Prevent and FBV are considered within our curriculum through our 'Growing Up' education, assemblies and through school visitors.	Ensure this plan of delivery continues each year.	DB and curriculum leads	Ongoing
Thinking about an incident of radicalisation and/or extremism - Has the setting considered specific potential areas of risk such as;						
Processes in place to manage Subject Access Requests/Freedom of Information Requests should they be made? Page | 72	□		We buy back SLA for GDPR. They are able to give advice and guidance about Subject Access Requests and FOI Requests. The school has policies for Freedom of Information requests and subject access requests. We require proof of identity and reasons for the SAR.			
The process in place for the management of information should there be media interest or if information requested into the community?	□		The school has an SLA with the Local Authority for Legal and media to support us with any issues of this nature.			
How will information be shared and with whom?			We will follow advice from the LA and share information with those that it is deemed necessary. Sharing of information will not be delayed if it is clear that in doing so would place a child at a greater risk of harm.			

Does the school have clear guidance for visiting speakers? Checks for external speakers to the school. Has the identity of the speaker been confirmed, and due diligence carried out? (Might consider checks on the internet to confirm the status of the speaker and/or the organisation to include websites, YouTube or social media sites.) Checks for premises used by externals?	□		Information sheet given to visiting speakers giving guidance for expected standards. Signed by visitor before commencing activities Visiting speakers are sent our Visiting Speaker Policy before commencement of any in school activity. This must be adhered to or the activities will not commence.			
	□		Visitors are required to read and sign the visitor code of conduct before any visit and staff are expected to engage with the speaker/organisation to ascertain the content of any presentation.			
	□		All external people using the premises must have documents in place including a safeguarding and health and safety policy. A letter of assurance is requested to ensure all those that work with children have a relevant DBS check. Checked by Business Manager.			

			Application for use is completed by the organiser and checked and authorised by the head. A face-face meeting is held with the organisation to ensure activities and procedures are appropriate.			
Have ALL staff received appropriated training on PREVENT? Does this include support staff? Are there provisions for new staff induction? Have Governors received a PREVENT briefing? Do all staff know what to do if they have a PREVENT concern and to whom to report it?	□		Ideally every 2 years through online training with relevant updates	Mop up those that have missed training.	DB, PW	Ongoing
	□		As above	As Above	DB, PW	Ongoing
	□		New staff complete the online training as part of our essential training package for new starters.			
	□		Most governors have completed the Home Office on line training in 2021	Update Governors annually on Prevent via FGB meetings	DB	
	□		Notice – Check – Share flow chart displayed in staffroom. All staff aware of Single Point of Contact for Prevent.	Consistently refer to protocol in briefings.	DB, PW	Ongoing
Does the Online Policy refer to the requirements of the Prevent guidance? Appropriate filtering is in place to ensure that staff and children are unable to	□		Online policy refers to the potential safeguarding risks of using the internet including that of radicalisation and extremist views.			

access unauthorised or extremist websites online through school systems.	□		The school uses Senso filtering system. The DSL and E Safety coordinator are alerted to any potential breaches. Alerts are monitored regularly to identify any concerns or patterns in online behaviour on school devices. Systems are reviewed at least annually to ensure robustness.	Governors receive a report at least annually on school filtering and monitoring procedures and protocols.	DB, JS	Ongoing
Protocols are in place to manage the layout, access and use of any space provided for the purposes of prayer, contemplation and faith facilities			N/A			
Clear guidance on governing the display of materials internally at the school	□		All materials requested to be displayed in school is approved by the head teacher.			

Appendix Thirteen: Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children/young people.

Operation Encompass connects the police with schools to enable that the appropriate support is in place for children/young people who are subject to/witness incidents of domestic abuse. The school environment enabling rapid provision allows for appropriate safeguarding to be put in place against the short, medium and long-term effects of domestic abuse. Following an incident, children/young people may arrive at school distressed, anxious or upset and Operation Encompass ensures that appropriate staff are

aware early enough in order to support children/young people in making them feel safe.

Please click here for more information.

Operation Encompass provides advice and helpline service for all staff members from educational settings who may be concerned about children/young people who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

Appendix Fourteen: Searching procedures

Schools will have due regard to Searching, Screening and Confiscation guidance as published by the DfE. This is referenced within our school Behaviour Policy.