



# Safeguarding and Child Protection Policy

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04/09/25	1.0	Statutory change	Annually

To be read alongside all relevant BOA Digital Technologies Academy policies and procedures including Behaviour Handbook, Anti-bullying Policy and E-Safety Policy

## Contents

1. Key contacts .....	4
2. Introduction and Context .....	4
3. Contextual Safeguarding.....	6
4. Safeguarding Roles and Responsibilities.....	6
5. Compliance and Quality Assurance .....	8
6. Safeguarding Processes and Procedures .....	9
7. Types Of Safeguarding Concerns .....	12
8. Attendance.....	24
This section must be read in conjunction with the academy attendance policy.....	24
9. Recruitment of staff and volunteers.....	26
10. Dealing with allegations against staff and volunteers - Whistleblowing .....	27
11. Safeguarding training for all staff and children.....	28
12. Anti Bullying.....	28
13. Confidentiality and sharing information.....	29
14. Industry providers and work placements .....	30
15. Internal Communication .....	30
16. External Communication .....	31
17. Procedures in Relation to Visitors to the Academy Site.....	31
18. Governance.....	31
19. Appendix A.....	33
Addendum 1 .....	34
Childhood Abduction and Community Safety Incidents .....	34
Children and the Court System .....	34
Childhood Mental Health.....	34
Children who need a social worker (Child in Need and Child Protection Plans) .....	35
Children with Family Members in Prison.....	35
Children Missing/absent from Education .....	35
Children with Special Educational Needs and Disabilities or physical health issues .....	37
Children who are lesbian, gay, bi, or trans (LGBT) .....	37
Cybercrime.....	37
Child on Child abuse .....	38
Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) .....	39
County Lines.....	40
Domestic Abuse .....	41
Elective Home Education .....	42

Harmful Sexual Behaviour.....	42
Homelessness .....	43
'Honour Based' Abuse (HBA) .....	43
Female Genital Mutilation (FGM) .....	44
Forced Marriage.....	44
Children In Care .....	45
Online Safety.....	45
Preventing Radicalisation.....	46
Private Fostering .....	47
Serious Violence.....	48
Sexting (Youth Produced Imagery).....	48
Sexual Violence and Sexual Harassment.....	49
Sexual Violence.....	49
Sexual Harassment.....	50
Upskirting.....	51

## 1. Key contacts

<b>Academy Context</b>	
Principal	Dr Jonathan Morris
The Designated Safeguarding Lead (Strategic)	Mr James Hardwick
The Designated Safeguarding Lead (Operational)	Mr Kevin O'Brien
The Deputy Designated Safeguarding Lead (s)	Mrs Deborah Hart Miss Anita Dyson Miss Lucy Russon
Attendance Welfare Officer	Miss Erin Skeete
The Designated Lead for Children in Care	Mr Kevin O'Brien
Safeguarding Governor	Paulette Osei-Tutu
<b>Additional Contacts and Agencies</b>	
Birmingham Children's Services: 0121 303 1888	
Sandwell Children's Services: 0121 569 3100	
Solihull MASH (Multi Agency Safeguarding Hub): 0121 788 4300	
Walsall MASH (Multi Agency Safeguarding Hub): 0300 555 2866	
Birmingham Prevent Manager: Waqar Ahmed (waqar.ahmed@birmingham.gov.uk) 0121 303 7682 / 07557 203290	
Local Authority Education Safeguarding Officer: Angela James (Angela.James@birmingham.gov.uk)  07510369871/Local Authority Website <a href="https://www.birmingham.gov.uk/schoolsafeguarding">https://www.birmingham.gov.uk/schoolsafeguarding</a>	
Local Authority LADO: 0121 675 1669 (Ladoteam@birminghamchildrenstrust.co.uk)	

## 2. Introduction and Context

### 2.1 Our Responsibilities

2.1.1 BOA Digital Technologies Academy is fully committed to safeguarding and protecting the welfare of our students. We believe that not only do we have a statutory duty to ensure that we safeguard and promote the welfare of children and young people in our care, but also a moral duty. We expect everyone who works in our Academy to share this commitment.

2.1.2 The protection of our students from suffering or the likelihood of suffering significant harm is the responsibility of **all** staff within our Academy, superseding any other considerations. All staff take welfare concerns seriously and always act in the best interests of the child and young person. Action should also be taken to promote the welfare of a student in need of additional support, even if they are not suffering harm or at immediate risk.

2.1.3 In this policy, we clearly outline the responsibilities of all adults working in the Academy to be aware of their duty and how to act upon any concerns with regard to child safeguarding. (Children includes everyone under the age of 18 and students who are over 18 but still attend the Academy.)

2.1.4 Staff should not assume a colleague or another professional will act. They must share information that might be critical in keeping children safe.

2.1.5 All staff **must** read Keeping Children Safe in Education 2025 (Part one and Annex A), Staff Conduct Policy, and Safeguarding and Child Protection Policy and sign to acknowledge they have read and understand these documents.

2.1.6 The Principal, Governors and all staff will receive child protection training which is regularly updated.

2.1.7 If staff have any concerns about a child's welfare, they should act on them **immediately**. They should follow this safeguarding and child protection policy and speak to the Designated Safeguarding Lead (DSL). In the absence of the DSL, staff should speak to the Deputy DSL/Principal.

2.1.8 The Academy takes its responsibility to safeguard young people seriously. Failure to follow these reporting procedures may result in disciplinary action.

2.1.9 This policy can be found on the Academy's website. It is also available for staff on the Academy SharePoint, along with supporting documentation and guidance.

## **2.2 Our Principles**

2.2.1 **All** staff, governors and volunteers should maintain an attitude of 'it could happen here' where safeguarding is concerned.

2.2.2 Protect our students and staff by recognising signs and symptoms of students suffering harm or likely to suffer harm at the earliest possible moment to prevent concerns from escalating.

2.2.3 Create a culture of vigilance by maintaining a 'child-centred' approach, listening to the voice of the child and always acting in their best interests.

2.2.4 Ensure that students recognise when they are at risk and know how to get help when they need it.

2.2.5 Firmly embed safeguarding in the curriculum, including online safety.

2.2.6 Provide a safe, stimulating and resilient environment built on mutual respect and shared values, where students can learn and develop.

2.2.7 Recognises that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected and may not recognise their experiences as harmful.

2.2.8 Recognise that children with additional needs or vulnerabilities including disability and/or sexual orientation or language barriers may require additional support to enable them to tell someone they are being abused.

2.2.9 Provide an environment which helps children feel safe and respected.

2.2.10 Work effectively with parents, agencies and other professionals as required by Working Together to Safeguard Children (2023) and in line with the guidance NPCC When to call the police.

## **2.3 Definition of Safeguarding**

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

- Protecting children from maltreatment, including online, whether that is within or outside the home
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Promoting children's welfare
- Taking early intervention

## **2.4 Scope**

2.4.1 In line with the law, this policy defines a child as anyone under the age of 18 years or any child on roll at this academy.

2.4.2 This policy applies to all members of staff in our academy, including all permanent, temporary and support staff, supply staff, governors, volunteers, contractors and external service or activity providers.

## **3. Contextual Safeguarding**

3.1. We recognise that as children grow and develop, they are influenced by a range of environments and people outside of their family, both in the real world and in the online world and may encounter risks in any of these environments. Sometimes these different contexts are inter-related and may mean that children may encounter multiple risks.

3.2. Through our day-to-day work and our safeguarding self-evaluation and review process we identify contextual and extra-familial safeguarding concerns and risks.

3.3. We work to understand and respond to children's experiences of harm beyond their families and recognise that the different relationships that children form in their neighbourhoods, school and online can feature harm, violence and abuse.

## **4. Safeguarding Roles and Responsibilities**

### **4.1. All staff, volunteers and governors have responsibility for the following:**

4.1.1 To provide a safe environment in which children can learn.

4.1.2. To identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm.

4.1.3. To take appropriate action, working with other services as needed.

4.1.4. To keep themselves updated with the systems within the academy which support safeguarding that were explained to them as part of their induction (including the Staff Code of Conduct). This includes knowing the role, and working with, the academy's designated safeguarding lead.

4.1.5. To ensure they receive appropriate safeguarding and child protection training (including digital safeguarding/online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring) which is regularly updated.

4.1.6. To support social workers to take decisions about individual children when required.

4.1.7. Knowing who the academy's designated safeguarding lead (DSL) and deputy are.

4.1.8. Raising any concerns with the designated safeguarding lead and deputy immediately.

4.1.9. Ensuring that safeguarding concerns are reported immediately, and always on the same day and making comprehensive, clear, accurate and professionally written accounts that will stand up to scrutiny.

4.1.10. Being alert to the signs of abuse, including child on child abuse and their need to refer any concerns to the designated staff member.

4.1.11. Maintaining an attitude of 'it could happen here' and always act in the best interests of the child. listening to, and seeking out, the views, wishes and feelings of children.

4.1.12. Sharing information and working together to provide children with the help they need.

4.1.13. Referring to the principal any concerns about another member of staff immediately, or if the concerns are about the principal, referring them to the BOA Group's CEO, the chair of governors where appropriate.

4.1.14. Raising concerns about poor or unsafe practice and potential failures in the academy's safeguarding regime through the academy's Whistleblowing Policy.

4.1.15. Being aware of Birmingham: Policies, procedures and guidance around safeguarding. [www.birmingham.gov.uk/info/50045/education\\_early\\_help\\_and\\_safeguarding/1986/policies\\_and\\_procedures\\_for\\_education\\_safeguarding/3](http://www.birmingham.gov.uk/info/50045/education_early_help_and_safeguarding/1986/policies_and_procedures_for_education_safeguarding/3).

4.1.16. Seeking early help where a child and family would benefit from coordinated support from more than one agency via Birmingham Children's Trust (CASS).

4.1.17. knowing the academy's procedures for dealing with child-on-child abuse, including sexual harassment and sexual violence between children.

4.1.18. knowing the academy's procedures for dealing with children who go missing from education, particularly on repeat occasions, and reporting any such concerns to the designated lead.

4.1.19. Reading KCSIE part 1

## **4.2 Principals and Academy Governance**

In line with KCSIE principals the academy governance are responsible for:

4.2.1. Reading, understanding and applying KCSIE and WTTSC statutory guidance.

4.2.2. Ensuring that there is an effective Child Protection and Safeguarding Policy in place together with a Staff Code of Conduct, which are provided to all staff.

4.2.3. Ensuring all staff are given a mandatory induction, which includes clear guidance on their safeguarding and child protection responsibilities, including online safety, and procedures to follow if anyone has any concerns about a child's safety or welfare.

4.2.4. Ensuring that policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are understood, and followed by all staff.

4.2.5. Ensuring that the academy has an appropriate senior member of staff from the academy leadership team, with appropriate status and authority, funding, resources and support to take the lead in responsibility for safeguarding and child protection- the Designated Safeguarding Lead (including online safety and understanding the filtering and monitoring systems and processes in place); and that they receive DSL /level 3 training which is updated every two years.

4.2.6. Ensuring that they are aware of and follow local procedures related to safeguarding.

4.2.7. Ensuring that they are doing all they reasonably can to limit children's exposure to online harms from the academy's IT system, but that 'over-blocking' does not lead to unreasonable restrictions.

4.2.8. Ensuring that the academy has in place filtering and monitoring, the efficacy of which is regularly monitored and reported on, and which complies with current filtering and monitoring standards.

4.2.9. Ensuring that all staff and volunteers undergo safeguarding and child protection training (including online safety, which includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring).

4.2.10. Ensuring governors receive appropriate safeguarding and child protection (including online safety which includes an understanding of filtering, monitoring systems and cyber security) training at induction which is updated regularly and at least annually to keep pace with KCSIE updates. 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 the academy are effective and support the delivery of a robust whole school approach to safeguarding and child protection.

4.2.11. Ensuring that they are 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.

4.2.12. Ensuring they have appropriate level of security protection procedures in place in order to safeguard children, staff and systems and which meet the standards in 'Cyber security standards for schools and colleges' guidance. (updated March 2025)

4.2.13. Ensuring that the obligations under section 26 of the Counterterrorism and Security Act 2015 are met and that the Prevent Duty guidance for England and Wales is followed.

4.2.14. Reading and referring to all of KCSIE.

## **5. Compliance and Quality Assurance**

5.1. BOA Digital will maintain high standards of safeguarding through clear processes for quality assurance, compliance reporting, and continuous improvement.

5.2. The Academy will use data, intelligence, and feedback, including the voice of the child, to ensure children receive effective support, to assess and reduce risks, to provide assurance to governance bodies, and improve safeguarding practice.

5.3. Non-compliance will be managed in line with Trust procedures, with referral to external agencies where appropriate.

## **6. Safeguarding Processes and Procedures**

6.1. The Academy will deliver its responsibilities for identifying and acting on early help needs, safeguarding and child protection in line with the policies and procedures identified in Birmingham City Councils Policies, procedures and guidance available at:

[https://www.birmingham.gov.uk/info/50045/education\\_early\\_help\\_and\\_safeguarding/1986/policies\\_and\\_procedures\\_for\\_education\\_safeguarding](https://www.birmingham.gov.uk/info/50045/education_early_help_and_safeguarding/1986/policies_and_procedures_for_education_safeguarding)

### **6.1. How To Report Any Concern**

6.1.1. Clear procedures on the reporting of any concerns are given to all staff/volunteers in the academy. This is done as part of the staff induction training and staff are given a reminder of this annually in refresher training. These procedures can be found in the staff share drive.

6.1.2. All concerns should be reported in writing, using CPOMS. If CPOMS is temporarily unavailable the academy should refer matters to the Designated Safeguarding Lead to record concerns. Concerns should always be completed as soon as possible, on the same day. Staff should never wait until the next day to complete a safeguarding concern report.

6.1.3 Concerns about a member of staff should be reported immediately to the Principal. Concerns about the Principal should be reported to the CEO and Chair of Governors where appropriate.

6.1.4. All child protection and/or safeguarding concerns should be reported to either Kevin O'Brien or James Hardwick (Designated Safeguarding Leads). See Appendix 1 for a flow diagram which explains how all disclosures are dealt with at the academy.

6.1.5. Failure to follow these reporting procedures may result in disciplinary action.

### **6.2 Taking Action**

6.2.1 If at any time it is considered that a child has suffered significant harm or is likely to do so, a referral should be made to Birmingham Children's Trust Emergency Duty Team 0121 675 4806, or Police Child Abuse Investigation Team on [westmidlands.police.uk/advice/adviceand-information/caa/child-abuse/how-to-report-possible-child-abuse/](http://westmidlands.police.uk/advice/adviceand-information/caa/child-abuse/how-to-report-possible-child-abuse/) or call 999 if you are concerned a child needs immediate protection.

6.2.2. If the child has an injury which requires medical attention, the child protection process will not delay the administration of first aid or emergency medical assistance.

6.2.3. The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

### **6.3. Children's Disclosure of Abuse**

6.3.1. At BOA Digital we have a clear procedure for reporting concerns. If a child talks to a member of staff about any risks to their safety or wellbeing, the staff member will let the child know that the staff member must pass the information on to the safeguarding team (DSL) to offer the proper support that the child requires. Staff members will allow them to speak freely and will not ask investigative questions.

6.3.2. Staff will be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and /or they may not recognise their experiences as harmful. Staff will be aware this could be due to their vulnerability, disability and or sexual orientation or language barriers.

6.3.3. The staff member will tell the child what will happen next. It is the duty of the member of staff to inform the Designated Safeguarding Lead of what has been discussed.

6.3.4. Information will be shared on a need-to-know basis only. Issues or concerns will not be discussed with colleagues, friends, or family unless necessary for the welfare of the child.

#### **6.4. Suspecting That a Child Is at Risk of Harm**

6.4.1. There will be occasions when staff may suspect that a child may be at risk but have no 'real' evidence. In these circumstances, staff will try to give the child the opportunity to talk.

6.4.2. Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with the Designated Safeguarding Lead, or Deputy Designated Safeguarding Leads and record their concerns on CPOMS.

6.4.3. All staff should be aware that children can abuse other children (child on child abuse) and that it can happen both inside and outside of school and online.

6.4.4. Staff will be aware of the harm caused by child-on-child abuse including sexual violence or harassment and recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

6.4.5. Staff will use the academy's Anti-Bullying Policy and/or Behaviour Policy where necessary [located via the academy website and Staff SharePoint]. However, when considering a child's behaviour all staff must be professionally curious and make a judgement as to any possible underlying safeguarding concerns.

6.4.6. There will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying/behaviour procedures.

6.4.7. For all children displaying challenging behaviour and bullying, the DSL must be included in decisions about consequences to determine any safeguarding risks.

6.4.8. The academy acknowledges that some children can be particularly vulnerable or may have an increased risk of abuse, and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare. To ensure that all of our children receive equal protection, we will give special consideration to children that are considered to be vulnerable.

#### **6.5. Notifying Parents**

6.5.1. The academy will normally seek to discuss any concerns about a child with their parents. The Designated Safeguarding Lead, or a member of the safeguarding team, will make contact with the parent in the event of a concern, suspicion or disclosure.

6.5.2. However, if the academy believes that notifying parents could increase the risk to the child, exacerbate the problem or compromise the safety of a staff member, advice will first be sought from Birmingham Children's Trust.

#### **6.6. Referral to Children's Social Care**

6.6.1. The Designated Safeguarding Lead or Deputy Designated Safeguarding Leads will make a referral to Children's Social Care (CASS) if it is believed that a child is suffering or is at risk of

suffering significant harm. The Academy may also make a referral to the Local Authority Designated Officer (LADO) on 0121 675 1669.

6.6.2. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

## **6.7. Private Fostering**

6.7.1. The academy will notify the local authority where we are aware or suspect that a child is subject to a private fostering arrangement.

6.7.2. Schools have a mandatory duty to notify the local authority if we are involved directly or indirectly in arranging for a child to be fostered privately. Notifications must contain the information specified in Schedule 1 of The Children (private Arrangements for Fostering Regulations 2005 and must be made in writing.

6.7.3. Academy staff should notify the designated safeguarding lead or deputy when they become aware of private fostering arrangements.

6.7.4. On admission to the academy, we will take steps to verify the relationship of the adults to the child who is being registered.

## **6.8. Reporting Directly to Child Protection Agencies**

Staff will follow the reporting procedures outlined in this policy. However, they may also share information directly with Children's Social Care, police, or the NSPCC if: The situation is an emergency and the Designated Safeguarding Lead, Deputy Designated Safeguarding Leads and the Vice Principal/Principal are all unavailable They are convinced that a direct report is the only way to ensure the child's safety.

## **6.9. Early Help**

6.9.1. Early help is support for children of all ages which improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area. Some early help is provided through "universal services" such as education and health services. They are universal services because they are available to all families, regardless of their needs. Other early help services are coordinated by a local authority and/or their partners to address specific concerns within a family and can be described as targeted early help. Examples of these include parenting support, mental health support, youth services, youth offending teams and housing and employment services. Early help may be appropriate for children and families who have several needs, or whose circumstances might make them more vulnerable. It is a voluntary approach, requiring the family's consent to receive support and services offered. These may be provided before and/or after statutory intervention.

6.9.2. Staff and volunteers working within the academy should be alert to the potential need for early help for children. Staff and volunteers should be alert to children with additional vulnerabilities who may benefit from Early Help.

## 7. Types Of Safeguarding Concerns

### 7.1 Types of abuse, neglect and exploitation

7.1.1. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults, or another child or children. It is important to remember that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

7.1.2. All staff must know what the different signs of abuse are and be alert to those signs.

7.1.3. All staff must maintain an attitude of 'it could happen here' and ensure any concern, no matter how small is reported. It could be the vital missing piece of the jigsaw that indicates a child is at risk of harm.

7.1.4. All staff will receive ongoing training regarding types of abuse including local and national context.

7.1.5. The DSL and/or deputy will respond to all concerns, following local authority procedures and where there is an immediate risk of serious harm to a child will inform the police.

7.1.6. Further information and resources can be found in annexes A, B and part 5 of KCSIE.

7.1.7. Definitions And Descriptors of Abuse:

**Abuse:** A form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children 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 can be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children (also referred to as peer-on-peer abuse/child-on-child abuse).

**Physical abuse:** May involve hitting, shaking, throwing, poisoning, suffocating, burning or scalding, drowning or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child whom they are looking after. This situation is commonly described using terms such as factitious illness by proxy or Munchausen's Syndrome by proxy.

**Emotional abuse:** The persistent emotional ill-treatment of a child such as to cause severe and persistent effects on the child's emotional development. It may involve conveying to children 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 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. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children 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 ill-treatment of a child, though it may occur alone.

**Sexual abuse:** It involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration, or non-penetrative acts. They may include non-contact activities, such as

involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not only perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:** The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical and emotional harm or danger, ensure adequate supervision (including the use of inadequate care-givers) or the failure to ensure access to appropriate medical care treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **7.3. Preventing Radicalisation**

7.3.1. The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Internet and use of social media have become a major factor in the radicalisation of young people.

7.3.2. Prevent aims to stop people from becoming terrorists or supporting terrorism. It also seeks to address the ideological causes of terrorism, help people who are vulnerable to radicalization, and help people who have already been involved in terrorism to rehabilitate and disengage.

7.3.3. The 2023 Prevent duty guidance for England and Wales came into effect on December 31, 2023, replacing the 2015 guidance. The guidance is available on the GOV.UK website.

7.3.4. All staff should be aware of the signs and symptoms of a young person being at risk of becoming radicalised:

- Spending increasing time in the company of other suspected extremists
- Changing their style of dress or personal appearance to accord with the group
- Their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)
- Attempts to recruit others to the group/cause/ideology
- Communications with others that suggest identification with a group/cause/ideology.

The examples above are not exhaustive and vulnerability may manifest itself in other ways.

7.3.5. Concerns may result in a referral to the Channel panel. The Channel panel is a voluntary process which supports people identified as being vulnerable to being drawn into terrorism.

7.3.6. Where staff are concerned that children are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead and be recorded on CPOMS. This can include extreme views on the role of women and girls.

7.3.7. The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

#### **7.4. Channel**

7.4.1. When it is appropriate the DSL will make a referral to the Channel programme.

7.4.2. We use the curriculum to ensure that children understand how people with extreme views share these with others to radicalise others, especially using the internet.

7.4.3. We are committed to ensuring that our children are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the academy's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just, and civil society.

#### **7.5. Child On Child Abuse**

7.5.1. All staff should be aware that children can abuse other children at any age and that it can happen both inside and outside of school and online.

7.5.2. All staff must know the indicators and signs of child-on-child abuse, know how to identify it and respond to reports of it. This includes sexual violence and sexual harassment.

7.5.3. All staff must be aware that even if there are no reports it does not mean child on child abuse is not happening. It may be the case that it is just not being reported.

7.5.4. Staff must be vigilant and if they have any concerns they should speak to the DSL's or deputies. We will minimise the risk of all types of child-on-child abuse by:

- Reminding students of our Anti Bullying Commitment
- Students taking part in Awareness Days, such as Anti Bullying Week
- Raising awareness of child-on-child abuse through PSHE lessons, assemblies and the tutor's programme.
- Listening to the student
- Acting upon what students say (Using our internal anti bullying flowchart)
- Referring/reporting to local safeguarding board/Police where necessary
- Bespoke sessions (PSHE/assemblies) for our SEND/LGBTQ/Most vulnerable students where the academy deem it appropriate
- Contact parents/carers

7.5.5. All staff must challenge inappropriate behaviours between children including, but not limited to:

- Bullying (including online bullying, prejudiced based and discriminatory bullying, inappropriate touching)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent which may also include an online element
- Sexual harassment such as sexual comments, remarks, jokes, and online harassment, which may be standalone or part of a broader pattern of abuse
- Consensual and non-consensual sharing of nudes/semi nude images and or videos (also known as sexting or youth produced sexual imagery)

- Up skirting – taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm.
- Initiation/hazing type violence and rituals.

7.5.6. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

## **7.6. Harmful Sexual Behaviour (HSB)**

7.6.1. This section of the policy must be read in conjunction with KCSIE Part 5 and the guidance in that section followed when responding to harmful sexual behaviour incidents.

7.6.2. We recognise that sexual behaviours exist on a continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. It can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

7.6.3. We also recognise that HSB can occur online and face to face (both physically and verbally) and is never acceptable.

7.6.4. We will ensure that all children are taught, in an age-appropriate way, about sex, relationships and consent and understand that the law is in place to protect children rather than criminalise them.

## **7.7. Sexual Violence and Sexual Harassment**

7.7.1. The academy has a zero-tolerance approach to sexual violence and sexual assault. It is never acceptable, will not be tolerated and will never be passed off as ‘banter’ ‘just having a laugh’ ‘part of growing up’ or ‘boys being boys’.

7.7.2. The academy will maintain an approach of it is happening here and may be well hidden from adults.

## **7.8. Responding to reports of sexual violence and sexual harassment.**

7.8.1. Our approach will be to support and reassure the victims that they are being taken seriously and that they will be supported and kept safe. We will ensure that victims are never given the impression that they are creating a problem or made to feel ashamed by reporting sexual violence or sexual harassment.

7.8.2. We will ensure that we maintain an awareness of intra familial harms and support is provided for siblings following incidents were reported.

7.8.3. Abuse that occurs online or outside of the academy will not be downplayed and will be treated equally seriously.

7.8.4. All staff will be trained in how to manage a report.

7.8.5. The academy recognises that certain children may face additional barriers to disclosure because of their vulnerability, disability, sex, ethnicity and/or sexual orientation and that procedures will ensure that all children are able to report easily.

## **7.9. Risk Assessment**

7.9.1. Where there has been a report of sexual violence the DSL or deputies will make an immediate written risk and needs assessment which will be kept under review and will work to engage with children's social care and specialist services as required.

7.9.2. Action will be taken immediately to protect the victim, alleged perpetrator(s) and other children in the academy. The academy will not wait for the outcome or even the start of any police investigation before taking action to protect the children involved.

7.9.3. Any relevant action under the academy behaviour policy will be considered.

7.9.4. Where there has been a report of sexual harassment the need for a risk assessment will be considered on a case-by-case basis.

7.9.5. The risk and needs assessment will consider:

- The victim, especially their protection and support
- Whether there may have been other victims
- The alleged perpetrator(s)
- All the other children (and, if appropriate adults and staff) at the academy, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harms

## **7.10. Action following a report of sexual violence and/or sexual harassment**

7.10.1. When a report has been received the DSL or deputy will consider the following:

- The wishes of the victim
- The nature of the alleged incident (s) including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children
- If the alleged incident is a one off or a sustained pattern of abuse
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers
- If there are any ongoing risks to the victim, other children, or staff.
- Intra familial harms
- Support for siblings at the academy
- Other related issues and the wider context including links to CSE and CCE.
- Making an assessment of the behaviours using the Brook Traffic Light Tool (or equivalent HSB assessment tool)

7.10.2. Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s), and any other children involved or impacted.

7.10.3. The DSL will consider 4 options when managing a report.

- Manage the report internally
- Provide support through the local Early Help process
- Make a referral to Children's Social Care
- Report to the police

7.10.4. All concerns, discussions, decisions, and reasons for decisions will be recorded on CPOMS.

7.10.5. The academy will ensure that if a child is convicted or receives a caution for a sexual offence the risk assessment will be updated to ensure relevant protections are in place and needs are being met.

7.10.6. If a report is assessed as being unsubstantiated, unfounded, false, or malicious the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been by someone else and that this is a cry for help. In such circumstances the DSL may make a referral to children's social care. An Early Help process may be initiated.

7.10.7. If a report is deliberately invented or malicious, the academy will consider what disciplinary action is appropriate as outlined in the behaviour policy.

### **7.11. Ongoing response – safeguarding and supporting the victim**

The following principles will help shape and decisions regarding safeguarding and supporting the victim:

- The needs and wishes of the victim will be paramount
- Consideration of the age and development stage of the victim, nature of the allegations and the potential risk of further abuse
- The victim will never be made to feel they are the problem or made to feel ashamed
- Proportionality of response. Support will be tailored on a case-by-case basis
- A holistic approach with an awareness of health needs associated with sexual assault including physical, mental, and sexual health problems and unwanted pregnancy

### **7.12. Academy Procedures**

Reports of HSB and urgent actions being required are responded to by following an internal procedure called 'code Blue' which is overseen by a member of the safeguarding team.

### **7.13: Domestic Abuse and Children**

7.13.1. This form of abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

7.13.2. Children can be victims of domestic abuse and as victims have protection and rights under the law. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

7.13.3. We encourage children to come forward by raising awareness of the issue and teaching the children about health relationships through SRE, the wider curriculum and modelling behaviour in the academy.

### **7.14. Adolescent to parent violent abuse (APVA)**

7.14.1. APVA is a hidden form of domestic violence and abuse that is often not spoken about. By raising awareness around this issue, we can provide better protection to victims and apply an appropriate safeguarding approach.

### **7.15. Digital safeguarding (also known as online safety/E-safety)**

7.15.1. We will ensure digital safeguarding is a running and interrelated theme when devising and implementing policies and procedures. This will include considering how digital safeguarding is reflected, as required, in all relevant policies. In addition, we will consider digital safeguarding whilst planning the curriculum, staff training, the role of the DSL and parental engagement.

7.15.2. Whilst the DSL has lead responsibility for digital safeguarding, we will ensure there is support, if required, for operational digital safeguarding and the appropriate technical and safeguarding knowledge, skills and understanding to be able to quality assure systems, policies and processes, train staff and contribute to the safeguarding curriculum is available.

7.15.3. We will keep our digital safeguarding processes and procedures under review using an independent tool such as SENSO.

7.15.4. Our Technology Acceptable Use policy is signed up to by all children and staff annually.

7.15.5. If a child, parent/carer, or member of staff has a concern relating to online safety children are encouraged to report it. They can report it directly to The Designated Safeguarding Lead or deputies.

7.15.6. Through our regular communication with parents, we will reinforce the importance of children being safe online, explain what systems we use to filter and monitor online use, explain what children are being asked to do online including sites they will be asked to access and who from the academy (if anyone) their child is going to be interacting with online.

7.15.7. We will conduct an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks our children face.

## **7.16. Photography and Images**

7.16.1. To protect children, we will:

- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- Seek parental consent
- Use only the child's first name with an image
- Ensure children are appropriately dressed
- Encourage children to tell us if they are worried about any photographs that are taken of them
- Remove photographs where requested
- Only use school equipment when taking photographs of children.
- Comply with GDPR

7.16.2. Parents, carers, or relatives may only take still or video photographic images of children in the academy or on academy-organised activities with the prior consent of the academy and then only in designated areas. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected. Parents can contact Reception or their child's Head of Key stage, Pastoral Manager or the safeguarding team.

## **7.17. Filtering, monitoring and cyber security**

7.17.1. The academy will limit children's exposure to risks from the academy's IT system.

7.17.2 The academy has in place appropriate filtering and monitoring systems that are in line with the recommendations in the UK Internet Centre document Appropriate Filtering for Education Settings and are informed by the academy's risk assessment required by the Prevent Duty

7.17.3. The academy will ensure that 'over blocking' does not lead to unreasonable restriction as to what children can be taught with regard to online teaching and safeguarding.

7.17.4. The academy will:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Review filtering and monitoring provision at least annually
- Block harmful and inappropriate content without unreasonably impacting teaching and learning
- Have effective monitoring strategies in place to meet safeguarding needs
- Follow the DfE guidance on filtering and monitoring requirements as they apply to generative AI
- Follow DfE guidance on the Prevent Duty, cyber security standards and filtering and monitoring standards for schools

7.17.5. The academy will conduct regular, at least termly, tests of the filtering and monitoring provision in the academy and report on findings.

7.17.6. All staff will be trained in digital safeguarding and will have a role in educating and protecting children about online harms.

7.17.7. We will seek to prevent children from online harms through educating them about the laws and potential consequences of activity online.

7.17.8. Digital safeguarding may be addressed through lessons, specialised digital safeguarding sessions, PHSE, the tutor programme, flexible-learning days and assemblies. This includes 1-1 and group intervention sessions when applicable.

7.17.9. There are appropriate levels of security protection procedures in place in order to safeguard children, systems and staff.

## **7.18. Sharing of nudes and semi-nudes (also known as youth produced sexual imagery sexting/nonconsensual sharing of images)**

7.18.1. Terms such as ‘revenge porn’ and ‘upskirting’ are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

7.18.2. In dealing with cases of sending of nudes, semi-nudes etc the response to these incidents will be guided by the principle of proportionality and the primary concern at all times will be the welfare and protection of any children involved.

7.18.3. To reduce the likelihood of the sharing of nudes/semi nudes we will:

- Outline our expectations and explain the rules of having a mobile, tablet or smartphone
- Expect all staff and children to sign an acceptable use policy
- Educate, in an age and stage appropriate way, about how to stay safe and the law in relation to sending and receiving of nudes/semi-nudes
- Encourage children to report concerns to an adult
- Ensure adults share concerns with the DSL

7.18.4. When a child has been affected by the sending of an explicit image staff will:

- Recognise that if the child has been sending explicit images or videos of themselves, the child may feel anxious talking about this
- Recognise that they themselves may feel shocked, upset, angry, confused, or disappointed while listening to the child
- Give themselves time to process the information, remembering that the child will be watching their reactions

- Reassure the child that they are not alone.
- Listen and offer support – they are probably upset and need help and advice, not criticism
- Not shout or make them feel like it is their fault
- Will not ask questions like "why have you done it?" as this may stop them from opening up
- Discuss the problem and the wider pressures that they may face, to help them to understand what has happened and understand any wider safeguarding concerns
- Assure the child that they will do all they can to help and explain that they will seek the support of the DSL
- Remind them that they can always talk to Childline or another trusted adult if they are not comfortable talking directly to the staff member

7.18.5. If a child has shared an explicit image, the DSL or deputy will:

- Ask them who they initially sent it to, their age, and if they know whether it's been shared with anyone else
- Support the victim to get the images removed by contacting the Internet Watch Foundation
- Assess the situation for wider safeguarding concerns and agree who will be contacted and when then contact parents/police/CEOP/ as appropriate to the case
- Contact the Child Exploitation and Online Protection Centre (CEOP) if the image was requested by an adult, as this is grooming which is illegal
- Contact the DSL at the relevant school if the image was requested by a school aged child not from this academy, to raise awareness of potential wider safeguarding issues or circulation of the image in their school
- All actions and information to be logged on CPOMS
- Parents to be contacted as appropriate

7.18.6. If a child has been sent a sexually explicit image:

- The DSL or deputy should ask them if they know the person who sent it and their age
- If the image was sent by another child, staff may want to help the child to speak to the sender in order to stop future messages. If the child agrees, staff can also help them to block the sender on social media
- The DSL will consult the UKIS sharing nudes and semi nudes advice Sharing nudes and semi nudes: how to respond to an incident ([publishing.service.gov.uk](https://publishing.service.gov.uk))
- If the image was sent by an adult, staff should contact CEOP, the Child Exploitation and Online Protection Centre, as this may be part of the grooming process
- All actions and information to be logged on CPOMS
- Parents to be contacted as appropriate

7.18.7. Staff must not:

- View, copy, print, share, store or save images
- Ask a child to share or download images (if you have already viewed the images by accident, you must report this to the DSL)
- Delete the images or ask the child to delete them
- Ask the child/children who are involved in the incident to disclose information regarding the image (this is the DSL's responsibility)

## **7.19. Upskirting**

7.19.1. Under the Voyeurism (Offences) Act 2019, upskirting is a criminal offence punishable by up to two years in prison. Upskirting' is where someone takes a picture under a person's clothing

(not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

7.19.2. Any concerns related to upskirting must be reported to the DSL in line with the reporting process outlines within this policy and where appropriate staff will also consult the behaviour policy.

## **7.20. Homelessness**

7.20.1. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead is aware of routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

7.20.2. It is 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.

7.20.3. Children's services will be the lead agency for these children, and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

## **7.21. Children with special educational needs (SEN) and disabilities**

7.21.1. All staff must therefore be aware of and extra vigilant to the possible indicators of abuse and/or neglect for disabled children. The designated safeguarding lead should liaise regularly with the special educational needs co-ordinator, the behaviour lead, the mental health lead and the attendance lead, maintaining a culture of vigilance and being alert to any relevant new information or concerns.

7.21.2. If staff have a concern for a disabled child, they must consider:

- child's communication needs and how they can communicate effectively with them  
What information in relation to the child disability and special needs staff need to be aware of in order to assess risk of abuse
- What resources staff require in order to undertake an informed assessment of safeguarding risk?
- Where child protection issues are considered regarding a child with disabilities, there must be involvement by key professionals who know the child well, including those who have a comprehensive understanding of the child's disability, method of communication, and any associated medical condition
- Schools should consider what specialist advice, guidance and training may be required in order for staff to understand why children with SEND can be more vulnerable to abuse and how to recognise signs of abuse and/or neglect of disabled children

## **7.22. Mental health**

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

7.22.2. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children 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.

7.22.3. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. We will ensure that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

7.22.4. We will ensure that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. (Information on these systems can be found in the mental health and wellbeing policy.

7.22.5. We seek to embed positive mental health and mental health awareness through our academy to create a culture where children can self-identify, signpost peers and seek support themselves. We undertake staff training and promote mental health awareness through the PHSE schemes of work, assemblies, tutor programme and across the curriculum where applicable.

7.22.6. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the referral mechanisms listed within this policy and speaking to the designated safeguarding lead or a deputy.

### **7.23. Children who are lesbian, gay, bisexual or gender questioning**

7.23.1. Children who are lesbian, gay, bisexual or gender questioning can be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who identify as lesbian, gay, bisexual or gender questioning.

7.23.2. Staff will endeavour to reduce the additional barriers lesbian, gay, bisexual or gender questioning children face and provide a safe space for them to speak out or share their concern with members of staff.

7.23.3. The academy will actively encourage lesbian, gay, bisexual or gender questioning children to share their lived experience and views in order to inform practice.

### **7.23. Safeguarding is not just about protecting children from deliberate harm**

7.23.1. All staff must have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

7.23.2. Staff must be aware of the signs of a variety of specific safeguarding issues as outlined in KCSIE, e.g. Child Criminal Exploitation- CCE (including County Lines), Child Sexual Exploitation- CSE, serious violence, so called 'Honour' Based Abuse (HBA), Female Genital Mutilation - FGM, Forced Marriage, Breast Ironing and know what to do if they have a concern.

7.23.3. Other safeguarding issues that all staff should be aware of include:

- Student's health and safety
- Bullying, including cyber-bullying (by text message, on social networking sites, and so on)
- Racist abuse
- Homophobic and transphobic bullying
- Harassment and discrimination
- Domestic violence

- Radicalisation and extremism
- Child sexual exploitation (CSE) and child criminal exploitation (CCE)
- Serious violence
- Gender or honour-based violence (including FGM)
- Teenage relationship abuse
- Use of physical intervention
- Meeting the needs of pupils with medical conditions
- Providing first aid
- Drug and substance misuse
- Educational visits
- Gangs and youth/serious violence
- Internet or e-safety
- Issues which may be specific to our local area or population, for example gang activity
- Child-on-child abuse
- Sexual violence and sexual harassment
- Impact of new technologies on sexual behaviour, e.g. sexting (youth produced imagery)
- Private fostering
- Children who go missing from education
- Children's mental health
- Children required to give evidence in criminal courts
- Children with family members in prison.

7.2.4. Further information about specific safeguarding issues are found in addendum 1.

## **7.24. Safeguarding Through the Curriculum**

7.24.1. The Academy delivers safeguarding across the curriculum to its students. This allows students to recognise when they are at risk and how to get help when they need it and to support students to keep physically and mentally healthy.

7.24.2. Student safeguarding and the promotion of Fundamental British Values are at the heart of all our work at BOA Digital Technologies Academy and great importance is placed on identifying opportunities within the curriculum for students to learn about safeguarding.

7.24.3. We are committed to ensuring that our students are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the academy's core values alongside the fundamental British Values gives students the chance to experience life in all its diversity, to acquire knowledge, understanding and skills that significantly impact on personal development, behaviour and welfare and equip every student with the knowledge and skills required for personal safeguarding.

7.24.4. During their time at the Academy students cover key topics in tutor time, assemblies and Personal Development lessons. The following topics are examples, but not exhaustive, of the kinds of issues we cover; cyberbullying, British culture, world cultures, sexual health, British values, keeping yourself safe, gender identity, healthy relationships, free speech, internet safety, drugs/alcohol education, the economy, the rule of law, government, multi-culturalism and more.

## **7.25. Victims and alleged perpetrator(s)**

7.25.1. Keeping Children Safe in Education 2024, in places, uses the term '**victim**'. It is a widely recognised and understood term. It is important that Academies recognise that not everyone

who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, Trust Academies should be conscious of this when managing any incident and be prepared to use any term with which the individual child or young person is most comfortable.

7.25.2. Keeping Children Safe in Education 2025, also uses the term 'alleged perpetrator(s)' and where appropriate 'perpetrator(s)'. These are widely used and recognised terms. However, each Academy will think very carefully about terminology, especially when speaking in front of children or young people, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. What is appropriate and which term to use will be decided on a case by case basis.

7.25.3. All Academy staff should be aware that children and young people may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children and young people may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.

7.25.4. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child or young person. It is also important that staff determine how best to build trusted relationships with children and young people to facilitate communication.

## **8. Attendance**

### **This section must be read in conjunction with the academy attendance policy**

8.1. Lack of or erratic attendance, persistent or severe absence is a serious safeguarding issue and must act as a warning sign to a range of concerns including neglect, sexual abuse, child sexual and child criminal exploitation particularly county lines. It may also be an indication of child-on-child abuse including bullying and sexual harassment, significant mental ill health concerns, caring responsibilities and/or other familial concerns. It must not be seen as an isolated concern.

8.2. Absence from education may increase known safeguarding risks.

8.3. We have a separate attendance policy (which includes protocols for children missing education and elective home education) in place which references statutory guidance 'Working together to improve school attendance' and other guidance including Children Missing Education.

8.4. Further information and support for academies can also be found in the Government's 'Missing Children and Adults - A cross government strategy' ([publishing.service.gov.uk](https://publishing.service.gov.uk)), Full time enrolment of 14-16 year olds in Further Education and Sixth Form Colleges.

8.5. We have a named senior leader with strategic responsibility for attendance – Kevin O'Brien.

8.6. Academy attendance operational leads, in addition to the general safeguarding training that all staff receive are given access to role specific safeguarding training and ensure they understand the safeguarding implications behind poor or non-attendance.

8.7. Academy leaders and governors ensure that attendance data, particularly for identified vulnerable groups is closely and regularly monitored identifying trends or patterns which may indicate safeguarding concerns.

8.8. Where appropriate, social workers will be involved, informed, and updated about attendance issues.

8.9. Safe and well checks are carried out on children who are absent, based on a vulnerability risk assessment.

8.10. The academy remains responsible for the safeguarding of children placed at any alternative provision.

8.11. Children Missing in Education (CME)

8.11.1. Children who go missing from education are at significant risk. Children who are already known to children's social care, who are on a child in need or child protection plan or in the care of the local authority (Children in Care) are additionally vulnerable and in need of additional protection.

8.11.2. We will follow the protocols laid out in our attendance policy.

8.11.3. The DSL will ensure the academy response to identifying children missing from education supports identifying potential abuse or exploitation and prevents them going missing in the future.

8.11.4. The academy will ensure compliance with the guidance and regulations contained in the appropriate sections KCSIE and Working Together to Improve School Attendance (2024).

8.12. Elective Home Education (EHE)

8.12.1. We will follow the protocols laid out our attendance policy.

8.13. Children with medical conditions who cannot attend school.

8.13.1. We will follow the protocols laid out our attendance policy.

8.14. Alternative Provision.

8.14.1. Where the academy places a child with an alternative provision provider, we continue to be responsible for their safeguarding.

8.14.2. We will follow the DfE statutory guidance for Alternative Provision and for Education where children with health needs who cannot attend school.

8.14.3. We will ensure that a robust and continuing due diligence and review process is in place which includes:

- Ensuring the placement meets the child's needs
- Assessing any additional risks of harm that the child may be vulnerable to due to any complexity of need
- Obtaining written information from the alternative provider that appropriate safeguarding checks have been carried out on all individuals working at their establishment and assurance that the provider will notify the academy of any staffing changes
- Obtaining written information from the provider of any arrangements which may put a child at risk
- Obtaining records of the address of the provider and any subcontracted provision or satellite sites the child may attend and ensure that we know where the child is based during the school day

- At least half termly review the provision, including obtaining the child's authentic voice to ensure the placement continues to meet needs
- Obtaining daily attendance information from the provider
- Ensuring that when safeguarding concerns arise the placement is immediately reviewed and terminated, if necessary, unless or until concerns have been satisfactorily addressed

## **9. Recruitment of staff and volunteers**

9.1. The academy will ensure that safer recruitment practices always follow KCSIE and will be adhered to by staff.

9.2. Every interview panel will have at least one member who has a current certificate in safer recruitment. These certificates will be updated every two years. We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. We will record the answers to safeguarding questions asked during the interview process on staff personnel files. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process including carrying out an online search as part of due diligence on shortlisted candidates.

9.3. As part of our due diligence. A member of staff directed by the principal, may carry out an online search on shortlisted candidates to help identify, through publicly available information, any incidents or issues that may be explored at interview.

9.4. We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our academy.

9.5. We will ensure that any alternative provision facility, contractor, or agency working with the academy provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in their provision.

9.6. Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

9.7. We will ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.

9.8. The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. The academy will ensure the correct level of DBS certificate is sought and ensure a prohibition check is undertaken.

9.9. The types of checks undertaken will be in accordance with the guidance given KCSIE.

9.10. Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary preemployment checks as required in the guidance given in KCSIE.

9.11. Where an enhanced DBS Certificate is required, it will be obtained from the candidate before or as soon as is practicable after the person is appointed.

9.12. The academy will always ask for written information about previous employment history and check that information is not contradictory or incomplete. References will be sought on all shortlisted candidates, including internal ones, before interview (unless the candidate has expressly denied permission for the employer to approach their referees). Where references have been

sought, any issues or concerns they raise can be explored further with the referee and taken up with the candidate at interview.

9.13. The academy will keep a single central record in accordance with the regulations given KCSIE. Recruitment and/or deployment checks will be undertaken as stated in KCSIE.

9.14. The academy will carry out all relevant checks if there are concerns about an existing member of staff and refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

9.15. The academy will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. This includes 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.

## **10. Dealing with allegations against staff and volunteers - Whistleblowing**

10.1. Whistleblowing is the act of disclosing wrongdoing. Please see BOA Digital Technologies Academy Whistleblowing Policy for further information.

10.1. We will prevent people who pose risks to children from working in our academy by ensuring that all individuals working in any capacity at our academy have been subjected to safeguarding checks in line with KCSIE. The academy will maintain ongoing vigilance of all adults working in or visiting the academy.

10.2. The academy holds a comprehensive 'Allegations against staff' policy and a staff code of conduct which can be found in the policy folder in the staff SharePoint, and which outlines in detail the expected standards of adult behaviour and procedures to take where there are concerns.

10.3. Where a child makes an allegation against a staff member, supply teacher or volunteer, the allegation will be taken seriously and acted upon immediately.

10.4. Parents will be contacted as soon as reasonably possible. The child will be offered support, and their wishes will be carefully considered before any actions are carried out.

10.5. Where any member of the academy staff, volunteer, governor, or visitor has concerns that the conduct of an adult has met the harm threshold, they must report those concerns immediately.

10.6. In the event of the allegation being made against the Principal, the Chief Executive Officer of the BOA Group should be informed (or in her absence the Chair of The Board of Trustees). The Chief Executive Officer will seek advice from the Local Authority before any other action is taken. The Chief Executive Officer will then manage the allegation. Further guidance can be found in (Part Four) of Keeping Children Safe in Education September 2025.

10.7. If for any reason you cannot make a referral through these routes the academy has a duty to refer directly to the Local Authority Designated Officer (LADO) who can be contacted by: 0121 675 1669 or by email via [Ladoteam@birminghamchildrenstrust.co.uk](mailto:Ladoteam@birminghamchildrenstrust.co.uk)

10.8. Under its duty of care for its employees, the academy will ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. The academy will ensure its obligations for confidentiality when an allegation has been made.

10.9. Concerns or allegations that do not meet the harm threshold/low level concerns:

10.9.1. All staff, governors, volunteers and visitors will be made aware what constitutes a low level concern and that all low-level concerns must be shared responsibly with the principal or DSL.

## **11. Safeguarding training for all staff and children**

11.1. Every year all staff (including non-teaching and volunteers) must undertake a variety of Child Protection and Safeguarding training including on KCSIE. This training will be informed by national and local context as well as identified gaps in knowledge and understanding.

11.2. Training is recorded and logged. All staff are informed clearly as to how to report anything of concern to Kevin O'Brien immediately. See Appendix 1 for a flow diagram of how concerns are dealt with at the academy.

11.3. All new members of staff, including newly-qualified teachers and teaching assistants, will be given induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, online safety, including filtering and monitoring and familiarisation with the safeguarding and child protection policy, KCSIE, WTTSC, whistleblowing policy, behaviour policy, anti-bullying policy staff code of conduct, systems and processes for CME and other related policies.

11.4. The designated safeguarding lead will undergo updated level 3/DSL level child protection training every two years and in addition to formal training, their knowledge and skills will be refreshed at least annually.

11.5. All staff members of the academy will undergo safeguarding and child protection training (whole-academy training) which is regularly updated.

11.6. All governors must undergo governor specific online awareness training at least every two years.

11.7. Staff members who miss the whole-academy training should notify the DSL and will be required to undertake other relevant training to make up for. It is the responsibility of each member of staff to ensure they have completed all mandatory safeguarding training.

11.8. We will ensure that staff members provided by other agencies and third parties, e.g., supply teachers and contractors, have received appropriate child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole academy training if it takes place during their period of work for the academy.

11.9. The designated safeguarding lead will provide an annual briefing to the academy on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews.

11.10. The DSL will ensure the academy maintains accurate records of staff induction and training.

## **12. Anti Bullying**

12.1. All staff must follow the anti-bullying policy which is published on the academy website.

12.2. If any child / member of staff / parent / carer has a concern about bullying, they should report it to: the safeguarding team, pastoral team or any member of staff.

## **13. Confidentiality and sharing information**

13.1. Staff should only discuss concerns with the designated safeguarding lead, principal, or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.

13.2. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

13.3. The Academy will use the DfE Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents, and carers May 2024 to inform and support their approach to information sharing.

13.4. All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that anything being released into the public domain does not compromise evidence.

13.5. Child protection files must be transferred to a new school within 5 days for in year transfers or within the first 5 days of the start of a new term.

13.6. Storage and Handling of Records:

13.6.1. Child protection information will be stored and handled in line with the principles set out in the Data Protection Act 1998 and the UKGDPR (2018) and the academy's Data Protection Policy.

13.6.2. The Academy will use the DfE 'Data Protection in Schools' April 2024 to inform and support their approach to information sharing.

13.6.3. Any paper record of concern forms and other written information will be stored in a locked facility accessed only by the principal and designated safeguarding lead. Any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access. Sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen.

13.6.4. Child protection information will be stored separately from the child's academy file, and the academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or academy they will be sent separately from the child's file and under a confidential cover or in an encrypted electronic file.

13.6.5. Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they will refer the request to the principal or Designated Safeguarding Lead. The Data Protection Act does not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child.

13.6.6. We will ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UKGDPR.

13.6.7. Further details on information sharing can be found:

- Working Together to Safeguard Children 2023, which includes a myth-busting guide to information sharing.
- At Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful.
- The Information Commissioner’s Office (ICO), which includes ICO GDPR FAQs and guidance from the department in Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR.

## 14. Industry providers and work placements

14.1. Providers have an obligation to provide a safe working environment for their staff and work experience students and a responsibility to protect students.

14.2. Industry professionals should be competent in their work role, mature in their attitudes and able to establish a good working relationship with young people.

14.3. Workplace providers will receive a copy of the Safeguarding and Child Protection Policy and information relating to their responsibility for safeguarding.

14.4. A member of the Senior Leadership Team will oversee the completion of risk assessments and include safeguarding discussions as part of workplace reviews with students.

14.5 Industry providers will receive information relating to safe practice in the workplace and safeguarding contact details.

14.6. An appropriate level of supervision of young people must be provided, at all times.

14.7. The Academy must be notified immediately of any accident pertaining to the young person while on placement.

14.8. The Academy must be notified immediately if the young person fails to attend their placement.

14.9. The Academy must be notified immediately of any instance of indiscipline that requires the young person to be removed from the workplace and returned to the Academy. The Academy and workplace provider will agree the best course of action and will notify the parent/carers where appropriate.

14.10. If any student makes an allegation during or following working with industry professionals about mistreatment, it may have to be referred to an outside agency for investigation. It is important to obtain a statement from the student, with permission if it is to be referred outside the Academy.

## 15. Internal Communication

15.1. All child safeguarding concerns/issues will be **CONFIDENTIAL**. Sharing of relevant information to staff will be strictly at the discretion of the DSL following the guidance issued by HM Government July 2018 - ‘Information Sharing: advice for practitioners providing safeguarding services’ (DfE 2018).

15.2. Information in relation to a student should not be kept “Confidential” if it is obtained through an external route. For example, a member of staff learnt of a concern through a social encounter with a parent.

## 16. External Communication

16.1. In line with 'Keeping Children Safe in Education September 2025', data protection is not a barrier to sharing information where failure to do so would result in a child being placed at risk of harm.

16.2. The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent. (Keeping Children Safe in Education September, 2025)

16.3. The academy follows the guidance in 'Keeping Children Safe in Education 2025' regarding transferring child protection files if a child leaves the Academy.

## 17. Procedures in Relation to Visitors to the Academy Site

17.1. Visitors are required to report directly to the reception by the main entrance.

17.2. Once inside the Academy, all visitors must sign in via the signing in screen.

17.3. The Safeguarding Advice for Visitors Booklet must be read.

17.4. A visitor's lanyard will be issued which is to be worn at all times.

17.4.1. A **red** lanyard signifies that the visitor must be escorted at all times, by a member of staff.

17.4.2. A **green** lanyard signifies that the visitor has an enhanced DBS clearance and can move around the building unaccompanied.

17.4.3. Visitors who have provided an enhanced DBS and attend the academy on a regular basis will be added to the Single Central Record.

17.5. Any unaccompanied visitors on site who are not recognised must be politely approached, questioned about their business in the academy and escorted immediately to reception.

17.6. The Academy reserve the right to refuse entry or terminate a visit at any time.

17.7. Material and key messages planned by guest speakers will be vetted prior to the event and, where appropriate, a social media check will be carried out.

## 18. Governance

17.1. All BOA Group Trustees and members of the Governance Advisory Board have an Enhanced DBS Check (without barred list, unless they are additionally in regulated activity).

17.2. Trustees fulfil legal obligations to provide a secure learning environment for its students.

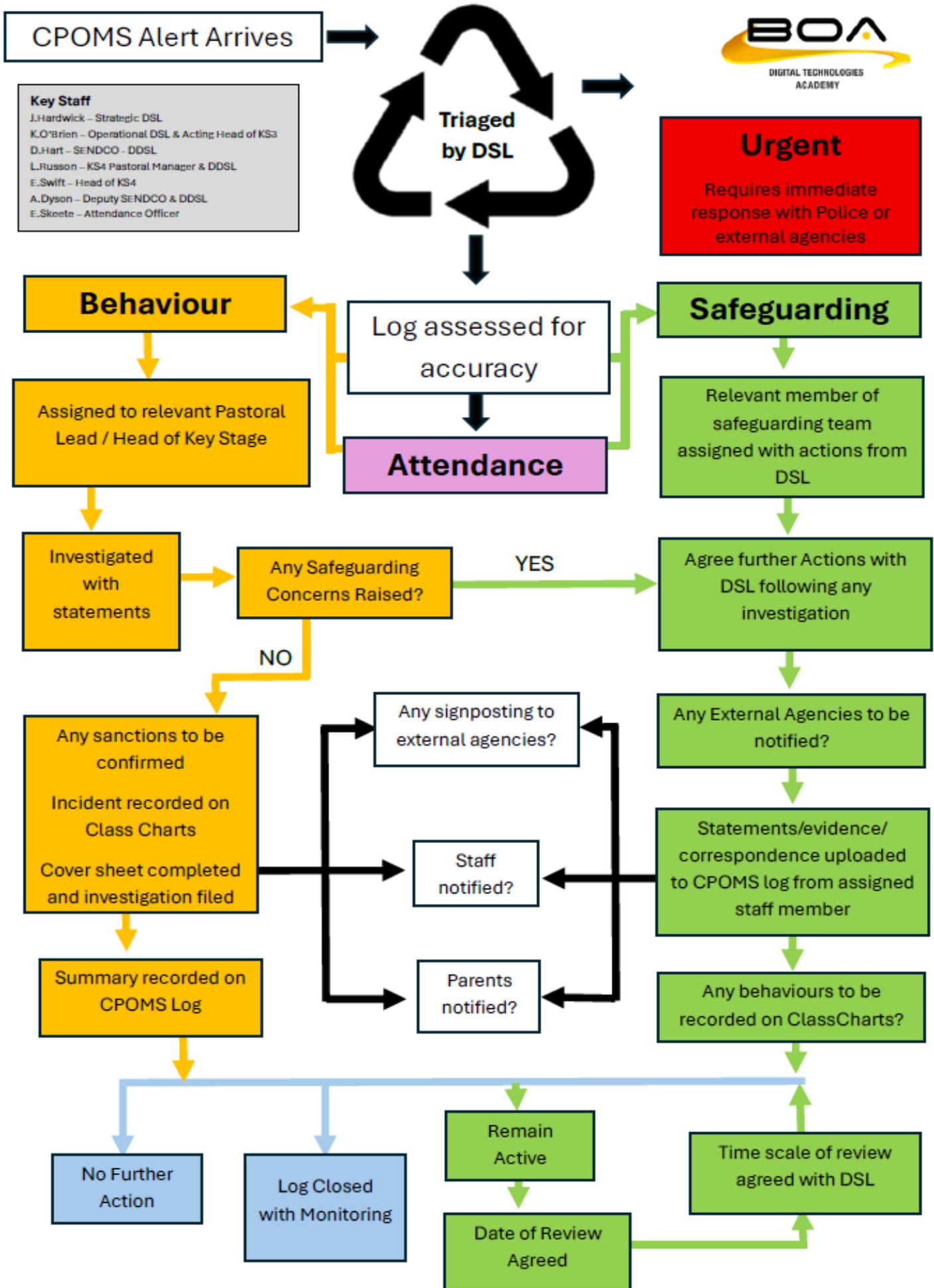
17.3. Trustees and members of the Governance Advisory Board receive training in their responsibilities for safeguarding. This includes ensuring there are policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote student' welfare and supports the delivery of a robust whole school approach to safeguarding. This includes ensuring:

- Statutory safer recruitment procedures are adhered to
- All staff undergo safeguarding training and child protection training at induction, and this is regularly updated and delivered to staff by the DSL, in line with advice from the local

Safeguarding Children's Board. The DSL also provides CPD for all staff on the most current safeguarding issues

- Appropriate filters and appropriate monitoring systems are in place to safeguard students from accessing potential harmful and inappropriate online material from the Academy IT system (please refer to the Academy's E-Safety Policy and ICT Acceptable Use Policies). Their effectiveness is reviewed regularly. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Students are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum
- The Trust appointed a Nominated Lead for Safeguarding and E-Safety. They are responsible for liaising with the Principal and Designated Safeguarding Leads over matters regarding child protection issues. The role is strategic and does not involve concerns about individual students
- The Trustees have allocated the role of Designated Teacher to promote the educational achievement of children who are looked after, or previously looked after, to the Designated Lead. This is because the most common reason for children becoming looked after is as a result of abuse/neglect. The Designated Lead works with the Virtual School Head Teacher to identify individual students needs and to develop and implement a Personal Educational Plan for every pupil in Local Authority care
- The Trust acknowledges its retained responsibility for any activities carried out with children on site or using the Academy's facilities - even if delivered by an external body or organisation. In such circumstances, the governing body satisfies itself that the group or organisation has its own safeguarding policy and procedures for safer recruitment of staff or leaders, or that the organisation signs up to the policy and procedure of the Academy. Therefore, the Trustees and Principal will only grant permission for use of the premises to recognised bodies (usually a national affiliation and a written statement of their adherence to safeguarding principles).

19. Appendix A



## **Addendum 1**

### **Further information about safeguarding:**

#### **Childhood Abduction and Community Safety Incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

#### **Children and the Court System**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17-year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

#### **Childhood Mental Health**

Mental illness and suicidal thoughts can affect anyone, of any age, of any background, at any time. Like with physical illnesses, people don't choose to have a mental health problem. It can be difficult to know if a child is suffering as they often keep it to themselves.

Some of the signs to be aware of may be:

- Becoming withdrawn from family and friends
- Persistent low moods and unhappiness
- Tearfulness and irritability
- Worries that stop them carrying out day to day tasks
- Sudden outbursts of anger directed towards others or themselves
- Loss of interest in activities that they used to enjoy
- Problems eating or sleeping
- Physical indicators, such as self-harm.

Any member of staff who suspects a child or young person is suffering with their mental health should share their concerns with the **Designated Safeguarding Lead**.

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day to day and identify those whose behaviour suggests that they are experiencing a mental health problem or be at risk of developing one.

Further information to support young people and their mental health can be found using the following links: <https://youngminds.org.uk> <https://stem4.org.uk> [www.mind.org.uk](http://www.mind.org.uk) [www.place2be.org.uk](http://www.place2be.org.uk) [www.mind.org.uk](http://www.mind.org.uk) [www.nspcc.org.uk](http://www.nspcc.org.uk) [www.actionforchildren.org.uk](http://www.actionforchildren.org.uk) [www.barnardos.org.uk](http://www.barnardos.org.uk)

## **Children who need a social worker (Child in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools/colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

## **Children with Family Members in Prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **Children Missing/absent from Education**

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

A child being absent from education for prolonged periods and/or on repeat occasions, going missing from education can be a potential indicator of a range of safeguarding possibilities. The Pastoral Team follows the Academy's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation and child criminal exploitation, and to prevent the risks of them going missing in future. This includes when problems are first emerging, but also where children are already known to local authority children's social care and need a social worker (such as on a child in need plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or community.

It is therefore essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

Further information and support, includes:

- Guidance on school attendance 'Working together to improve school attendance' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education.

The Academy will inform their Local Authority of any student who is going to be removed from the admission register where the student:

- Has been taken out of the Academy by their parents and the Academy has received written notification from the parent they are being educated outside the school system e.g. home education
- Has ceased to attend school and no longer lives within reasonable distance of the Academy at which they are registered
- Has been certified as unlikely to be in a fit state of health to attend the Academy before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the Academy after ceasing to be of compulsory school age
- Are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the Academy at the end of that period
- Has been permanently excluded

The Academy will inform the Local Authority of any student who fails to attend the Academy regularly, adhering to the authority's guidelines. The Academy will carry out 'safe and well' checks where necessary, in discussion with the Designated Safeguarding Lead. The Academy will always liaise with, and take advice from Children's Services.

The Academy will inform the Local Authority of any first day absence of a Looked After Child, where contact with carers could not be made.

For further information and guidance please refer to the relevant Academy's policies in conjunction with this policy. For further guidance on **Children Missing from Education**, please also refer to the Academy's Attendance Policy.

Parents/Carers **must** ensure the Academy has at least two emergency contacts for their child.

## **Children with Special Educational Needs and Disabilities or physical health issues**

Children with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges. Staff in our Academy recognise that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- These children are more prone to peer group isolation or bullying (including prejudice based bullying) than other children
- Children with SEN and disabilities can be disproportionately impacted by things like 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 and young people with SEND will therefore require close liaison with the designated safeguarding lead (or a deputy) and the SENCO or the named person with oversight for SEND in the academy.

## **Children who are lesbian, gay, bi, or trans (LGBT)**

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic and transphobic bullying and abuse.

## **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'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and

- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above

Children and young people with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or Deputy) should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. 146 Note that Cyber Choices does not currently cover 'cyber enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK.

## **Child on Child abuse**

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of the Academy and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in the Academy, it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL (or deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff and students should understand that we have a zero-tolerance for child-on-child abuse and that we take such incidents very seriously, engaging with relevant external agencies where appropriate.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Staff are clear as to the Academy policy and procedures with regards to child on child abuse as defined in the Antbullying and Behaviour Handbook, and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Staff will ensure that any disclosure of child-on-child abuse from a student, or indeed behaviours that have been witnessed are reported via CPOMS and a conversation held with the DSL as soon as possible to allow the incident to be investigated in the correct manner and by trained staff.

Students who abuse others will be responded to in a way that meets their needs as well as protecting others within the academy community through a multi-agency risk assessment. We ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.

## **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 an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be the financial benefit to other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups.

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

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex
- Can still be abuse even if the sexual activity appears consensual
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity.
- Can take place in person or via technology, or a combination of both.
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

- May occur without the child or young person’s immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).
- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, 13 and access to economic or other resources

**Child Criminal Exploitation** is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim wants or needs and/or (b) for the financial or other advantage of the perpetrator or facilitator and or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears to be consensual. CCE does not always involve physical contact, it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines see section 18), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following signs may be indicators of child sexual exploitation and child criminal exploitation:

- Children who appear with unexplained gifts/money or new possessions
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late; and Children who regularly miss school or education or do not take part in education
- Children with unexplained injuries
- Children in possession of multiple mobile phones

There are some indicators that will differ for male and female victims. Staff should be mindful of female pupils wearing inappropriate clothing, found to be carrying a large number of condoms on their person, or who fall pregnant. Male pupils who are found to have committed offences, become homeless or disclosed their sexuality are at greater risk of vulnerability and therefore greater risk of exploitation.

## County Lines

County lines is the police term for gangs and organised criminal networks supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or “deal lines”. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money.

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons.

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person under the age of 18 years
- Can still be exploitation even if the activity appears consensual
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- Can be perpetrated by individuals or groups, males or females, and young people or adults and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors, including gender, cognitive ability, physical strength, status, and access to economic or other resources

One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection).

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, children's homes and care homes.

The national picture on county lines continues to develop but there are recorded cases of the use of social media to make initial contact with children and young people.

## **Domestic Abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children and young people, as victims in their own right, if they see, hear or experience the effects of abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial; and
- Emotional.

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

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare.

National Domestic Abuse Helpline 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. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Refer to page 147 of KCSIE 2023 for more information on Operation Encompass and the National Domestic Abuse Helpline Refuge and additional advice on identifying children and young people affected by domestic abuse.

## **Elective Home Education**

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

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their Local Authority of all deletions from their admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from the Academy, with a view to educating at home, we will liaise with the Local Authority and relevant key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of the child. This is particularly important where the child has SEND, is vulnerable, and/or has a social worker.

## **Harmful Sexual Behaviour**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in Keeping Children Safe in Education 2024 (part 5, para 455).

HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors.

Sexual behaviour between children and young people can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is prepubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Confidential specialist support and advice on HSB is available from the specialist sexual violence sector.

It is effective safeguarding practice for the DSL (and deputy) to have a good understanding of HSB. This could form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any Deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

In most cases we will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home and will require a different level of intervention and support. Children's services will be the lead agency for these young people and appropriate referrals should be made based on the child's circumstances.

## **'Honour Based' Abuse (HBA)**

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and treated as such. If in any doubts staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

## Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Possible warning signs that FGM might be about to take place are:

- Mention of a female relative coming to visit
- A girl becoming easily distressed, fearful or anxious
- Referencing FGM (or its other alternative names)
- A child talking about a special procedure/ceremony that is going to take place
- The family making preparations to take the girl abroad 'on holiday' e.g. arranging vaccinations or requesting a prolonged absence from school

There is a range of symptoms of FGM that could consist of:

- Severe and/or constant pain
- Infections, such as tetanus, HIV and hepatitis B and C
- Infertility
- Bleeding, cysts and abscesses
- Difficulties urinating or incontinence

Victims of FGM are likely to come from a community that is known to practise FGM. Teachers must personally report to the police (dialling 999), after informing the DSL, if they discover that FGM appears to have been carried out on a girl under the age of 18.

## Forced Marriage

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

Our Academies can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of KCSIE 2024 which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK ([www.gov.uk](http://www.gov.uk)).

Staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

## **Children In Care**

The most common reason for children becoming children in care after is as a result of abuse and/or neglect. The Academy will ensure that staff have the skills, knowledge and understanding to keep children in care safe.

In particular, we will ensure that appropriate staff have the information they need in relation to a child's CIC status (whether they are a CIC under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

A previously child in care potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously children in care safe. When dealing with children in care and who may have previously been a child in care, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Children in care and who may have been previously in care may also have additional barriers to overcome in relation to safeguarding. The staff member at the Academy with responsibility for children in care is named in section1: Key Contacts.

## **Online Safety**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation - technology often provides the platform that facilitates harm. An effective approach to online safety empowers the Academy to protect and educate the whole community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material
- Contact: being subjected to harmful online interaction with other users
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm – this can included sending nude images and/or semi-nude images
- Commerce: risks such as online gambling, inappropriate advertising, phishing or financial scams

Please also refer to the Academy's E-Safety and ICT Acceptable Use Policies.

As our students increasingly work online, it is essential that they are safeguarded from potentially harmful and inappropriate online material, including when they are online at home. The Academy use specialist online monitoring software to ensure that inappropriate content or sites are not accessed by students or staff. Please also refer to the Academy's 'Staff Conduct Policy'.

The Academy uses specialist online monitoring software to ensure that inappropriate content or sites are not accessed by pupils or staff on school devices and school networks. Please also refer to the 'Employee Code of Conduct'.

The safeguarding and online training that our Academy staff receive will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

As outlined in our E-safety policy, the DSL take responsibility in this area and have a full understanding of the filtering and monitoring systems and processes.

The Academy IT Department will ensure that our Academies are meeting the DFE's filtering and monitoring standards. The Governor with specific responsibility for safeguarding will pay due regard to the DFE's filtering and monitoring standards and consider how our Academies are meeting these standards during their annual safeguarding audit.

The Academy will cascade information regarding keeping children safe online regularly to parents/carers.

## **Preventing Radicalisation**

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Internet and use of social media have become a major factor in the radicalisation of young people.

Prevent aims to stop people from becoming terrorists or supporting terrorism. It also seeks to address the ideological causes of terrorism, help people who are vulnerable to radicalization, and help people who have already been involved in terrorism to rehabilitate and disengage.

The 2023 Prevent duty guidance for England and Wales came into effect on December 31, 2023, replacing the 2015 guidance. The guidance is available on the GOV.UK website.

All staff should be aware of the signs and symptoms of a young person being at risk of becoming radicalised:

- Spending increasing time in the company of other suspected extremists
- Changing their style of dress or personal appearance to accord with the group
- Their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)
- Attempts to recruit others to the group/cause/ideology
- Communications with others that suggest identification with a group/cause/ideology

The examples above are not exhaustive and vulnerability may manifest itself in other ways.

Concerns may result in a referral to the Channel panel. The Channel panel is a voluntary process which supports people identified as being vulnerable to being drawn into terrorism.

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying

political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

The Academy value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both students and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and 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.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. The Academy is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

We seek to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to the Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk is part of our Academy's safeguarding approach. Please refer to our 'Radicalisation and Extremism' policy and our 'Prevent' risk assessment.

- Terrorism is an action that endangers or cause serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- **If you have any concerns about any of the above, please report immediately to the DSL.**

## Private Fostering

Private fostering is an arrangement made privately, (without the involvement of a local authority) where a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by someone other than a parent or close relative, with the intention that it should last for 28 days or more.

Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle or aunt (whether full or half blood or by marriage) or step-parent will not be a private foster carer. A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child.

Parents and private foster parents both have a legal duty to inform the relevant local authority at least 6 weeks before the arrangement is due to start; not to do so is a criminal offence.

Academy staff should notify the DSL if they become aware of private fostering arrangements. The Academy will notify the Local Authority of the circumstances, and the Local Authority will check that the arrangement is suitable and safe for the child. Local authorities have a duty to satisfy themselves

that the welfare of children who are, or will be, privately fostered within their area is being, or will be, satisfactorily safeguarded and promoted.

## **Serious Violence**

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

These may include increased absence from the Academy, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school/academy, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

## **Sexting (Youth Produced Imagery)**

Sexting is the sharing of sexual imagery (including nudes and semi-nudes) by young people.

Creating and sharing sexual photos and videos of under-18s (including those created and shared with consent) is illegal and therefore causes the greatest complexity for schools/academies and other agencies when responding. It also presents a range of risks which need careful management.

The Academy adheres to guidance from the [UK Council for Child Internet Safety \(UKCCIS 2020\)](#) which acknowledges the current broad usage of the term 'sexting' and introduces the phrase 'youth produced sexual imagery or 'youth involved sexual imagery'.

The guidance covers the following incidents:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

The advice does not cover the sharing of sexual imagery of people under the age of 18 by adults as this constitutes child sexual abuse and requires immediate police involvement.

The advice does not cover a person under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images.

All incidents of youth produced sexual imagery or youth involved sexual imagery are dealt with as safeguarding concerns. Staff must follow the safeguarding referral system if any such incident comes to their attention.

## Sexual Violence and Sexual Harassment

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

As set out in Part one Keeping Children Safe in Education 2024, all staff working with children at our Academy are advised to maintain an attitude of **'it could happen here'**.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physical and verbal) and are **never acceptable**.

It is important that **all** victims are taken seriously, offered appropriate support and reassured that we will work with agencies to keep them safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should they ever be made to feel ashamed for making a report. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is **not** acceptable, will **never be tolerated** and is **not** an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh' or 'boys being boys'; and
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. **Dismissing or tolerating such behaviours risks normalising them**

The Academy adheres to guidance Keeping Children Safe in Education 2025 (part 5) when dealing with an incident of sexual violence and sexual harassment between students.

Following a report of sexual violence, the DSL (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

## What is the difference between sexual violence and sexual harassment?

### Sexual Violence

It is important that Academy staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way, **and that it can happen both inside and outside of the Academy**. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

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

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

### **Causing someone to engage in sexual activity without consent:**

A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

### **What is consent?**

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

Academy staff should be aware that:

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

### **Sexual Harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to; violate a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- Sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual 'jokes' or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (Academies should be considering when any of this crosses a line into sexual violence - it is important to talk and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- Consensual and non-consensual sharing of sexual images and videos
- Sharing of unwanted explicit content
- Upskirting (is a criminal offence)
- Sexualised online bullying
- Unwanted sexual comments and messages, including, on social media; and - sexual Exploitation; coercion and threats

## Upskirting

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

## The response to a report of sexual violence or sexual harassment:

The response to a report from a child is important. The Academy is aware that how we respond to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. If we fail to recognise, acknowledge or understand the scale of harassment and abuse, or even downplay some of these behaviours, we are risking this leading to a culture of unacceptable behaviour. It is **essential** that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should **never** be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

An example of what to say to a child if they disclose to a member of staff is given below:

"Thank you for sharing this with me. You have been very brave in telling me and I appreciate how difficult that will have been. You have done nothing wrong, and I am so proud of you for sharing this today. It is really important that I pass this information onto (DSL name) so that we can support you".

## Relationships Education, Relationships and Sex Education (RSE) and Health Education.

The Academy incorporates relationships education, relationships and sex education (RSE) and health education within the curriculum. Please also refer to the Academy Relationships Education, Relationships and Sex Education (RSE) policy.

- Access to the Academy
- The identity of the visitor must be confirmed
- All such visitors will have enhanced DBS clearance
- If the clearance is not held by us, we will require confirmation that appropriate clearance has been obtained and the visitor will wear a badge issued by the organisation holding their DBS clearance
- Material and key messages planned by guest speakers will be vetted prior to the event and, where appropriate, a social media check will be carried out

