

Templefield Lower School

Child Protection and Safeguarding Policy



Templefield Lower School

School acknowledgement

The school is committed to safeguarding and child protection in line with statutory guidance. As required, all staff have read and understood part one of [Keeping children safe in education \(2025\)](#).

Role	Name(s)	Contact number	Email
Designated Safeguarding Lead	Debbie Trivett	01525 713625	dtrivett@templefield-lower.co.uk
Deputy Designated Safeguarding Leads	Carol Smithers Ann Coward Liz Fitch	01525 713625	csmithers@templefield-lower.co.uk acoward@templefield-lower.co.uk
Operation Encompass Single Point of Contact (SPOC)	Debbie Trivett	01525 713625	dtrivett@templefield-lower.co.uk
Prevent Single Point of Contact (SPOC)	Debbie Trivett	01525 713625	dtrivett@templefield-lower.co.uk
Local Authority Designated Officer	Stephen Lagan Sian Clery Laura Davies	0300 300 8142	LADO@centralbedfordshire.gov.uk
Safeguarding Governor	Sue Simmons		chair@templefield-lower.co.uk

Access and Referral Hub

Telephone: 0300 300 8585 during office hours (0300 300 8123 out of hours)

[Child protection - safeguarding children and young people, Central Bedfordshire Council](#)

Local Multi Agency Safeguarding Arrangement

Note:

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

[Safeguarding Bedfordshire](#)

Introduction

Safeguarding is defined as:

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

Child Protection is defined as:

- Activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

[\(Working together to safeguard children, DfE, 2023\)](#)

This includes, but is not limited to, safeguarding children in specific circumstances.

Neglect	Physical abuse
Emotional abuse	Sexual abuse

Bullying, including online and prejudice-based bullying	Racist, disability and homophobic or transphobic abuse
Gender based violence/violence against women and girls	Radicalisation and/or extremist behaviour
Child sexual exploitation (CSE) and trafficking	Honour based abuse
Teenage relationship abuse	Child on child abuse
Gang / youth violence, including initiation and hazing	Substance abuse
Female genital mutilation (FGM)	Domestic abuse/violence
Fabricated or induced illness	Forced marriage
Online, including grooming via social networking, online gaming, video messaging	Poor parenting
Self-harm behaviours	Impact of new technologies on sexual behaviour e.g. Youth Produced Sexual Imagery
Upskirting	Children with mental health difficulties or illness
Contextual/extra-familial risks	Exploitation

The school is committed to safeguarding and promoting the welfare of all its children. We believe that:

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

The school will fulfil its local and national responsibilities as laid out in the following documents:

- [Working together to safeguard children \(DfE, 2023\)](#)
- [Keeping children safe in education \(DfE, 2025\)](#)
- [Information sharing \(DfE, 2024\)](#)
- The procedures of the Pan Bedfordshire [Safeguarding Children Partnership](#) and Safeguarding Adults Boards
- [Working together to improve school attendance \(DfE, 2024\)](#)
- [The Children Act 1989](#)
- [The Education Act 2002 \(s175 / s157\)](#)
- [What to do if you are worried a child is being abused \(DfE, 2015\)](#)
- [Use of reasonable force in schools \(DfE, 2013\)](#)
- [Mental health and behaviour in schools: Departmental advice \(DfE, 2018\)](#)
- [Preventing and tackling bullying: Advice for headteachers, staff and governing bodies \(DfE, 2017\)](#)
- [Prevent duty guidance: England and Wales \(2023\)](#)
- [Terrorism \(Protection of Premises\) Act 2025: factsheets](#)
- [Serious Crime Act 2015](#)
- [Sexting in schools and colleges: responding to incidents and safeguarding young people \(UK Council for Child Internet Safety, 2016\)](#)
- [Criminal exploitation of children and vulnerable adults: county lines \(Home Office guidance, 2023\)](#)
- [Children missing education \(DfE, 2016\)](#)
- [Statutory guidance on children who run away or go missing from home or care \(DfE, 2017\)](#)
- [Child sexual exploitation: definition and guide for practitioners \(DfE, 2017\)](#)
- [The Domestic Abuse Act 2021](#)

- [Drugs \(DfE and ACPO guidance\)](#)
- [Sharing nudes and semi-nudes: advice for educational settings \(2024\)](#)

Designated Safeguarding Lead

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

They will provide support to staff members in carrying out their safeguarding duties and will liaise closely with other services, such as the Early Help team, Children's Social Care, health, police etc.

The DSL is supported by the following Deputy Designated Safeguarding Leads; Carol Smithers, Ann Coward and Liz Fitch. The Deputy DSLs are trained to the same level as the DSL and will undertake this role operationally with direct oversight and management from the DSL who maintains lead responsibility for safeguarding and child protection (including online safety, filtering and monitoring).

The DSL is supported in developing knowledge and skills to:

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

When the school has concerns about a child, the DSL or Deputy will decide what steps should be taken in accordance with the [Thresholds Document](#) and initiate a response accordingly. This may include providing a singly agency Early Help response, or a referral to Children's Social Care for a statutory social work assessment. The headteacher will be kept apprised of cases as appropriate.

The DSL and Deputies should liaise with the three safeguarding partners and work with agencies in line with [Working together to safeguard children \(2023\)](#). The NPCC guidance [When to call the police](#) should help the DSL understand when they should consider calling the police and what to expect if they do so.

For further information on the role and responsibilities of the DSL, see Appendix 1.

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

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

The DSL will ensure the child protection files are transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term, to allow the new school to have support in place for when the child arrives (KCSIE 2025).

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

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

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

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

- If a child is being removed from school roll in order to be home educated, the school will ensure all relevant safeguarding information is shared with the Elective Home Education team.
- When a DSL resigns their post or no longer has child protection responsibility, there should be a full face to face handover/exchange of information with the new post holder. This exchange should be recorded as part of the incoming role holder's induction/performance management.
- In exceptional circumstances, when a face to face handover is not feasible, the headteacher will ensure that the new post holder is fully conversant with all procedures and case files.

Overall aims

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

- Clarifying standards of behaviour for staff and children.
- Contributing to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect and shared values.
- Creating an organisational culture that is safe for children.
- Introducing appropriate work within the curriculum.
- Encouraging children and parents to participate.
- Developing staff's awareness of the risks and vulnerabilities children face to enable them to recognise and respond to concerns.
- Addressing concerns at the earliest possible stage in the least intrusive way.

Key principles

- Always see the child first and consider what life is like for them, maintaining a culture of vigilance.
- Provide support and intervention at the earliest possible opportunity in the least intrusive way, such as [Early Help](#).
- Have conversations, build relationships and maintain professional curiosity.
- Focus on securing improved outcomes for children.
- Build a culture of openness and transparency where all staff are able to demonstrate understanding of their role and responsibility to safeguard and promote the welfare of children.
- Every child is entitled to a rich and rounded curriculum.
- When issues arise, headteachers should speak out, addressing them internally where possible and engaging in a multi-agency response when required in accordance with interagency procedures.

Key processes

All staff should be aware of the guidance issued by the Central Bedfordshire Safeguarding Children Partnerships (CBSCP) within the Thresholds of Need Guide in order to secure support and intervention for children at the earliest possible opportunity in the least intrusive way. This document is integral to safeguarding children in Central Bedfordshire schools and we will always use the [Thresholds Document](#) to underpin our decision making.

Expectations

All staff and regular visitors will:

- Be familiar with this policy and implement it consistently in the course of their work with children.
- Be aware of the role and identity of the Designated Safeguarding Lead and Deputies for the school.
- Refer child protection concerns to Children's Social Care in the absence of the DSL and be aware of the statutory assessments under Section 17 and Section 47 of the Children Act 1989 that they may contribute to.
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.
- Be involved in the implementation of Individual Education Programmes, Early Help assessments and plans, Child in Need plans and Child Protection plans.
- Be alert to signs and indicators of safeguarding concerns and possible abuse.
- Record concerns and pass the record to the DSL or a member of the safeguarding team.
- Recognise and respond to concerns about the behaviour of staff, students and volunteers which indicates they may pose a risk of harm to children following interagency procedures agreed by the CBSCP.
- Deal with a disclosure of abuse from a child in line with the guidance in Appendix 4.

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

The DSL together with the named Deputies will undertake additional higher level training in order to ensure they have appropriate knowledge and skills to undertake the role and will utilise the training opportunities available from [Safeguarding Bedfordshire](#) and other organisations as agreed by the governing body. This training will be regularly updated at a minimum of two-yearly intervals.

In addition to the above, all staff will receive safeguarding updates as required, and at least annually, which may include e-learning, circulation of information and guidance internally, staff meetings and INSET training. The subject/topics for training and updates will take into consideration the CBSCP's priorities, local context, the needs of our pupils and identified training needs of staff.

Governing Body

The governing body will ensure that they comply with their duties under legislation. They will have regard to [Keeping children safe in education \(2025\)](#) to ensure that the policies, procedures and training in our school are effective and comply with the law at all times.

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

The nominated governor for child protection at the school is Sue Simmons.

They are responsible for liaising with the headteacher and DSL over all matters regarding child protection issues. The role is strategic rather than operational; they will not be involved in concerns about individual children.

For further information on the role and responsibilities of the governing body, see Appendix 2.

Safer School Culture

The culture of our school is one that is safe for children and unsafe for adults that may pose a risk to children. There is a belief that safeguarding is the responsibility of all adults working or volunteering within the organisation and that all concerns will be reported to the headteacher when concerns relate to an adult.

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

Inspection

From November 2025, Ofsted's inspections of early years, schools and post-16 provision will be carried out under the [Education inspection framework \(EIF\)](#).

The school will be aware of the inspection guidance and the requirements from Ofsted. Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective.

Safer Recruitment and Selection

The school pays full regard to [Keeping children safe in education \(2025\)](#). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks through the Disclosure and Barring Service (DBS), Childcare (Disqualification) Regulations (where applicable) and prohibition order checks in respect of the following which will also include historic GTCE sanctions.

The school acknowledges that S128 checks should be completed on those members of staff and governors taking part in management roles. A Section 128 would prohibit someone from:

- Serving as a governor of a maintained school.
- Holding a management position in an independent school, academy or free school as an employee.

- Becoming a trustee of an academy or free school trust; a governor or member of a proprietor body for an independent school.
- Becoming a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of children.

Debbie Trivett and Carol Smithers have undertaken Safer Recruitment training. One of the above will be involved in **all** staff/volunteer recruitment processes and sit on the recruitment panel.

The school has decided to carry out online searches for shortlisted candidates as part of due diligence in our recruitment process, as set out in paragraph 225 of Keeping Children Safe in Education (2025). The searches are conducted by a member of the safeguarding team and recorded on the Online Search Record form. The process will be consistent, transparent and fair, and reflected in our Safer Recruitment Policy.

Operation Encompass

The school is working in partnership with Central Bedfordshire Council and Bedfordshire Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally this scheme is called [Operation Encompass](#).

The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have seen, heard or experienced the domestic incident, the police will inform the key adult (usually the DSL or Deputy) in school before they arrive at school the following day.

This 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 their needs.

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

The school has an information sharing agreement in place with Bedfordshire Police for Operation Encompass.

The school will receive Missing Persons notifications should a child go missing, in line with the addition to Operation Encompass.

Our Role in the Prevention of Abuse

In accordance with [Working together to safeguard children \(2023\)](#), the school recognises the need to safeguard children from abuse.

Appendix 3 contains more information about definitions and indicators, specifically:

- Neglect
- Emotional Abuse
- Physical Abuse
- Sexual Abuse

In addition, the school is alert to the need to safeguard children in specific circumstances as defined within [Keeping children safe in education \(2025\)](#).

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

Curriculum

The school acknowledges preventative education is most effective in the context of a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

The school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by our Behaviour Policy and pastoral support system, as well as by a planned programme of evidence-based Relationships and Health Education (RHE) delivered in regular timetabled lessons and reinforced throughout the whole curriculum. Such a programme is fully inclusive and developed to be age and stage of development appropriate (especially in considering the needs of children with SEND and other vulnerabilities).

The school has regard to the new statutory [Relationships Education, Relationships and Sex Education \(RES\) and Health Education](#) guidance which has been revised for introduction in September 2026.

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

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

Online Safety

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

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

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories. We use approaches from [Educate Against Hate](#) to tackle this important area.
- **Contact:** being subjected to harmful online interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm, for example: making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The school has a clear policy on the use of mobile and smart technology, and how this is managed on site.

Alternative Provision

The school utilises alternative provision providers for children where required, and we understand that we maintain the responsibility for the safeguarding of that child. We will ensure the placement meets the child's needs. We will ensure we obtain written confirmation of the following:

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

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

The school has due regard to the following statutory guidance:

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

Safeguarding in specific circumstances

Staff must be aware of and alert to specific safeguarding issues.

Children who are vulnerable to extremism

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

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

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

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix 6.

The school has due regard for the [Terrorism \(Protection of Premises\) Act 2025](#) (otherwise known as 'Martyn's Law') and refers to the following guidance: [Terrorism \(Protection of Premises\) Act 2025: Overarching Factsheet](#). The Act received Royal Assent on 3 April 2025 and it is expected that the implementation period will be at least 24 months.

In accordance with the Prevent Duty, Debbie Trivett is the Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.

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

If a child is thought to be at risk of radicalisation, a referral will be made using the National Prevent Referral Form which shall be sent directly to the police.

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

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

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

Female Genital Mutilation

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 can be known as female circumcision or female genital cutting and is often carried out for cultural, religious and social reasons within families and communities.

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

The Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** (along with social workers and healthcare professionals) **to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. This is in addition to following the school's safeguarding reporting procedures. A teacher means any person within the Education Act 2002 (section 141A (1)) employed or engaged to carry out teaching work at schools or other institutions.

Those failing to report such cases will face disciplinary sanctions.

If the school is concerned that a child has experienced or is at risk of FGM, a child protection referral will be made to the Access and Referral Hub, in accordance with interagency procedures produced by the CBSCP. In addition, all teachers will follow mandatory reporting duties. Please refer to the [Pan Bedfordshire One Minute Guide Female Genital Mutilation](#).

Further information regarding FGM can be found in Appendix 7.

Forced Marriage

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

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

The Anti-Social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the forced marriage takes place).
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not).
- Breaching a Forced Marriage Protection Order.

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

Modern Day Slavery

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

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

Types of human trafficking

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

- Sexual exploitation
- Forced labour
- Domestic servitude
- Organ harvesting

- Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc.
- Forced marriage and illegal adoption (if other constituent elements are present)

Child on child abuse

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

All staff, but especially the DSL and Deputies, should consider whether children are at risk of exploitation or abuse outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including, but not limited to, sexual abuse, including harassment and exploitation, domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation

The school recognises that children can abuse each other, and such behaviours are never viewed simply as 'banter' or as part of growing up. We recognise that child on child abuse can take many different forms such as:

- Cyber-bullying
- Sending or posting sexually suggestive images, including nude or semi-nude photographs via mobiles or over the internet by persons aged under 18 (referred to as Youth Produced Sexual Imagery)
- Sexual assault
- Sexual violence or harassment
- Upskirting
- Sexually harmful or problematic behaviour
- Gang initiation or hazing type violence
- Harassing messages and misogynistic messages
- The non-consensual sharing of indecent images
- The sharing of abusive images and pornography, to those who do not want to receive such content
- The exploitation of others, linked youth produced images

Upskirting is an illegal offence which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.

The school recognises serious violence and signals that children are at risk from, or are involved in, serious violent crime. Indicators may include increased absences, a change in friendships/relationships with older individuals or groups, a significant decline in performance, self-harm, significant change in well-being or signs of assault/unexplained injuries. Unexplained gifts or new possessions could indicate that children have been appropriated, or are involved with, individuals associated with criminal networks or gangs.

[Contextual safeguarding](#)/extra-familial risks as referenced in Keeping children safe in education (2025) highlights that *'assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process'*.

Contextual safeguarding can also be known as *'risk outside the home'* (Working together to safeguard children, 2023).

The school has a thorough understanding of contextual safeguarding and will make a referral in the first instance if apparent.

The school has adopted a Child on Child Abuse Policy which outlines the actions that will be taken in responding to reports of child on child abuse.

The school manages the use of mobile and smart technology on the premises and reflects this in the Mobile Phone policy.

We carry out an annual review of our approach to online safety, filtering and monitoring that considers the risks to children.

Sexualised behaviours

Where children display sexualised behaviours, the behaviours will be considered in accordance with the child's developmental understanding, age and impact on the alleged victim. Tools such as the Brook Traffic Light Tool may be used to assist in determining whether the behaviour is developmental or a cause for concern. This will assist in ensuring the child receives the right support at the right time, either via an Early Help response or referral to Children's Social Care.

The school will follow [Keeping children safe in education \(2025\)](#) guidance when responding to such issues, alongside local interagency procedures. This includes responding to any reports in a child-centred manner and undertaking an immediate risk and needs assessment in relation to the victim, the alleged perpetrator and other children.

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

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

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

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

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

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

Gang related violence (Contextual/Extra-familial risk)

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

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

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

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

The school understands the process of completing a multi-agency information sharing form which highlights broader concerns contextually occurring outside of the child's home.

See Appendix 9 for further information on risk indicators for gang involvement.

Youth Generated Sexualised Imagery

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

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

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

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

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

If none of the above applies the school may choose to deal with the incident without involving Bedfordshire Police or Children's Social Care. This will usually be the case where the DSL is confident that they have enough information to assess the risks to the pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework. All decisions and rationale for decision making will be recorded. All decisions will be based on the best interests of the child/children.

The school will pay due regard to the Department for Education guidance: [Searching, screening and confiscation in schools](#).

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

More information is available in Appendix 8.

Child Sexual Exploitation and Child Criminal Exploitation

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

Child Sexual Exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child under the age of

18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child Sexual Exploitation does not always involve physical contact; it can also occur through the use of technology.

All staff will be aware that being absent, as well as missing, from education can be a warning sign of a range of safeguarding concerns, including sexual abuse, Child Sexual Exploitation or Child Criminal Exploitation.

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

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

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

The school recognises that there are various 'models' of Child Sexual Exploitation which include, but are not limited to:

- Abuse of authority
- Boyfriend / girlfriend model
- Child on child
- Familial
- Gangs and groups
- Online

Where concerns are identified in relation to Child Sexual Exploitation, the [Thresholds Document](#) will be consulted in order to ensure the child receives support at the earliest possible opportunity.

An Early Help multi-agency response may be initiated from the school as the lead professional by completing an Early Help Assessment or completing an Early Help referral through the Access and Referral Hub.

If a child is thought to be at risk of significant harm through Child Sexual Exploitation, a referral will be made to Children's Social Care.

Advice will be sought to establish if a [National Referral Mechanism](#) is appropriate.

Resources from the [Centre of Expertise on Child Sexual Abuse](#) will be utilised to strengthen our approach to Child Sexual Abuse.

Children in specific circumstances: further guidance

Further guidance in relation to safeguarding children in specific circumstances can be found on the [Bedford Borough, Central Bedfordshire and Luton Safeguarding Children Partnerships procedures website](#).

Mental Health

All staff are 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. However, staff will 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.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken in line with this policy, including discussion with the DSL or Deputy. The DSL will liaise with the Senior Mental Health Lead, or Mental Health Support team, where the safeguarding concern is linked to mental health.

The school will access a range of advice to help them identify children in need of extra mental health support. This includes working with external agencies as described in [Promoting and supporting mental health and wellbeing in schools and colleges](#).

Homelessness

The school recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

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

The school recognises that whilst in most cases school staff will be considering homelessness in the context of children who live with their families, it should also be recognised in some cases 16- and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's Social Care will be the lead agency for these young people and the DSL (or Deputy) should ensure appropriate referrals are made based on the child's circumstances.

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

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

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

Domestic Abuse

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

Staff will continue to develop their understanding of domestic abuse and how 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.

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

The school recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse.

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

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

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

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

Cybercrime

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

Cyber-dependent crimes include:

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

Children with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or Deputy) should consider referring into the **Cyber Choices** programme.

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

Additional advice can be found at [Cyber Choices](#).

Children with additional needs

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

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

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison with the DSL (or Deputy) and the SENCo. The school will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

If the school is considering excluding, either fixed term or permanently, a vulnerable child and/or a child who is the subject of a child protection plan or where there is an existing child protection file, we will call a multi-agency risk-assessment meeting prior to making the decision to exclude.

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

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

Children who are lesbian, gay, bisexual or trans (LGBT), or gender questioning

The school recognises that whilst the fact a child may be LGBT is not in itself an inherent risk factor for harm, children who are LGBT can be targeted by other children.

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.

The school will endeavour to reduce barriers faced by children who are LGBT and will provide a safe space for them to speak out or share their concerns with members of staff.

Further government guidance is expected on gender questioning children, and once available, policies and procedures will be updated.

What we do when we are concerned about a child

All concerns will be viewed alongside the [Thresholds Document](#) in order to ensure the appropriate support or intervention is provided at the earliest opportunity in the least intrusive way.

The school also pays due regard to the guidance contained in [What to do if you are worried a child is being abused \(2015\)](#).

If, in consultation with the [Thresholds Document](#), the level of concern sits at Level 2 then support will be provided by the school as the lead professional. If, in consultation with the Thresholds of Need Guide, the concern sits at Level 3, a referral will be made into the Access and Referral Hub. Additional support or advice for this work may be sought from the Early Help Service as a multi-agency response.

In cases where it is not possible to obtain consent from the parent/carer, the school will seek advice from the Integrated Front Door.

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

In the event that provision of support has not led to improvements for the child, or concerns escalate, the school will follow the step-up [Escalation Procedures](#) published by the CBSCP.

In consultation with the [Threshold Document](#), if the concerns about the child indicate that they may be at risk of or suffering significant harm, a referral will be made to the Access and Referral Hub.

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

In the event of a professional disagreement in relation to a specific concern, the school will follow the [Escalation Procedures](#).

Involving parents/carers

In general, we will discuss any safeguarding and child protection concerns with parents/carers before approaching other agencies, and will seek their consent for making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the DSL. However, there may be

occasions when the school will contact another agency **before** informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.

Parents/carers will be informed about this policy through the school website.

Multi-agency work

The school understands its role in the Central Bedfordshire Safeguarding Children Partnership (CBSCP). The governing body and Senior Leadership team, especially the DSLs, will make themselves aware of and follow their local arrangements.

The school works in partnership with other agencies in the best interests of children. The school will, where necessary, liaise with the school nurse, initiate an effective support response and make referrals to Children's Social Care. Referrals and contacts should be made by the DSL or one of the Deputies to Early Help or Children's Social Care. Where the child already has a social worker, the request for service will go immediately to the social worker involved, or in their absence, to their team manager or the duty social worker.

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

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

Where a child is subject to a Child Protection plan, Child in Need plan or TAF support plan, the school will contribute to the preparation, implementation and review of the plan as appropriate.

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

Responding to an allegation or concern about a member of staff

The school will comply with the CBSCP procedures for [Allegations and Concerns regarding Staff, Carers and Volunteers Working with Children and Young People](#) in all circumstances.

These procedures should be used in any case in which it is alleged that a member of staff (**including supply staff**), governor, visiting professional or volunteer has:

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

We will consult with the LADO when an allegation is made against a member of staff to agree how to progress this.

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

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

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

Schools should follow their safeguarding policies and procedures in the event of an allegation regarding an 'incident that happened where an individual or organisation was using their school

premises for the purposes of running activities for children.' This includes events such as community groups, sports associations and more.

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

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

The LADO in Central Bedfordshire can be contacted via email: LADO@centralbedfordshire.gov.uk.

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

The school will engage with the LADO at all stages of the management of the allegation/concern, and comply with the statutory guidance contained within [Keeping children safe in education \(2025\)](#) and the local procedures published by [Safeguarding Children, Central Bedfordshire Council](#).

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

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

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

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

The school will adhere to the statutory guidance contained within [Keeping children safe in education \(2025\)](#) with regard to record keeping, references and compromise or settlement agreements.

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

The school has appropriate policies and processes in place to manage and record any such concerns that do not meet the harm threshold and take appropriate action to safeguard children.

If a member of staff, student or volunteer has any concerns about poor, unsafe practice, or failures of the safeguarding regime, they are encouraged to raise this with the headteacher, Senior Leadership team or governing body, following the school's Whistleblowing Policy.

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

Monitoring and review

This policy will be reviewed annually by the headteacher. At every review, the policy will be approved by the full governing body.

Approved by governors: October 2025

Last reviewed: September 2025

Next review: September 2026

Appendix 1

The Designated Safeguarding Lead will:

- Support staff who make referrals to the local authority Children's Social Care and act as a source of support, advice and expertise for all staff.
- Refer cases to the police where a crime may have been committed.
- Inform the headteacher of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.
- Be aware of the requirement for children to have an appropriate adult. Further information can be found in the statutory guidance [PACE Code C 2019](#).
- Seek advice in regard to safeguarding matters related to radicalisation and make referrals to Channel as required.
- Liaise with the Designated Senior Manager for allegations to ensure, where necessary, referrals have been made to the Disclosure and Barring Service when a person is dismissed or resigned due to risk/harm to a child.
- Liaise with the Senior Mental Health lead and, where available, the Mental Health Support team, where safeguarding concerns are linked to mental health.
- Lead regular case monitoring reviews of vulnerable children. These reviews, together with any actions arising from the review and the rationale for decision-making, will be recorded in case files.
- Ensure safeguarding and child protection information is dealt with in a confidential manner and in accordance with the [Safeguarding Children, Central Bedfordshire Council](#).
- Ensure staff are informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual child and/or family.
- Ensure a written record is made of what information has been shared with whom and when.
- Ensure that child protection files are kept up to date.
- Ensure rationale for making decisions is recorded (including decisions not to make a referral).
- Ensure safeguarding and child protection records are stored securely in a central place separate from academic records.
- Ensure individual files are kept for each child: the school will not keep family files.
- Ensure access to safeguarding and child protection records by staff other than the DSL is restricted, and a written record kept of who has had access to them and when.
- Ensure parents are usually (subject to the point below) aware of information held on their children and are kept up to date regarding any concerns or developments by the appropriate members of staff.
- Ensure general communications with parents are in line with any home school policies and give due regard to which adults have parental responsibility.

Appendix 2

The governing body will ensure that:

- The school contributes to inter-agency working in line with statutory guidance [Working together to safeguard children \(2023\)](#). This includes providing a co-ordinated offer of Early Help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to Child Protection plans.
- The school provides an appropriate safeguarding response in order to safeguard children.
- Online safety is a running and interrelated theme whilst devising and implementing the whole school approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety, filtering and monitoring whilst planning the curriculum, any teacher training, the role and responsibilities of the DSL (and Deputies) and any parental engagement.
- The school pays due regard to the need to safeguard children in specific circumstances, such as Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), vulnerability to radicalisation, Female Genital Mutilation (FGM) or child on child abuse which can include gang related violence, cyberbullying, sexually harmful behaviours, sexual violence, sexual harassment, upskirting or youth produced sexual imagery.
- The child protection policy reflects and addresses additional challenges that exist for those children with special educational needs and disabilities, and physical and mental health needs, and the school should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.
- The school maintains information about the legal status of all children, including whether a looked after child is subject to S20 voluntary agreements, interim or full care order, contact details for persons with parental responsibility, level of delegated authority, details of the social worker and the virtual head in the authority that looks after the child.
- There is a designated teacher with the appropriate training, skills and knowledge appointed to work with the virtual school head to promote the academic achievement of looked-after children and children previously looked-after.
- The school's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-procedures, set up by the CBSCP. This includes working with Children's Social Care from other areas when children attend school in Central Bedfordshire but live outside of Central Bedfordshire.
- The school shares information with other practitioners in the interests of safeguarding children in accordance with the guidance within [Working together to safeguard children \(2023\)](#) and [Information Sharing \(2024\)](#).
- They recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that clearly set out the processes and principles for sharing information within the school and with Children's Social Care, the safeguarding partners, other organisations, agencies, and practitioners as required.
- That school staff are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging or where a child is already known to the local authority Children's Social Care.
- They are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

- Relevant staff have due regard to the relevant data protection principles.
- The school initiates appropriate safeguarding responses to children who are missing or have unexplained and/or persistent absences from education, to help identify the risk of abuse and neglect, including sexual abuse, exploitation or radicalisation and to help prevent the risks of their going missing in future.
- The headteacher ensures that safeguarding policies and procedures which have been adopted by the governing body are consistently implemented.
- The school has a staff code of conduct which should amongst other things include staff/child relationships and communications, including the use of social media and other online platforms, and low-level concerns.
- The school has procedures for managing **any** allegations and concerns about adults that work or volunteer with children, that **may** or **may not** meet the harm threshold, and that these include the procedures for making referrals to the Disclosure and Barring Service and Teacher Regulation Agency where appropriate.
- The school operates 'safer recruitment' procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers in accordance with [Keeping children safe in education \(2025\)](#).
- The DSL is a member of the Senior Leadership team and has lead responsibility for safeguarding which is not delegated. This is clearly defined within the role holder's job description and that this person has the appropriate authority, time, training, funding and resources to undertake this role, as per Appendix C of Keeping Children Safe in Education (2025).
- The DSL maintains management oversight of any work undertaken by the Deputy DSLs.
- Any Deputy DSLs have the appropriate training, skills and knowledge to undertake the operational function of the DSL, as per Appendix C of Keeping Children Safe in Education (2025).
- The DSL and Deputies undertake [Pan Bedfordshire Safeguarding Children Partnership's](#) higher level training to ensure they have the appropriate training, skills and knowledge to carry out this role.
- In addition, the DSL and Deputies will update their knowledge by receiving safeguarding updates via the DSL forums, cluster meetings, attendance at training and learning events offered by the CBSCP, online updates via NSPCC or attendance at professional development events.
- The headteacher and all other staff who work with children undertake safeguarding training in accordance with [Keeping children safe in education \(2025\)](#) and that they receive annual safeguarding updates to ensure their continued professional development.
- All governors receive appropriate safeguarding and child protection (including online, and filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in school are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be updated annually.
- Training updates take account of CBSCP priorities, the local context, the needs of the pupils and other identified training needs.
- All training will incorporate safeguarding children in specific circumstances, which includes, but is not limited to: Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), vulnerability to radicalisation and child on child abuse.
- The training will ensure that child on child abuse is never seen as 'banter' or part of growing up and incorporates issues of sexually harmful behaviours such as sexual touching or assault and

gang initiation or hazing type violence. The training recognises how alcohol use, drug use, truancy and youth generated sexualised imagery increases risks of harm to children. In addition, the training will also ensure staff have the skills and knowledge about the additional vulnerability of looked-after children.

- The school has appropriate safeguarding responses for children who go missing from education, which should include holding more than one emergency contact number for pupils.
- The school recognises that being absent, as well as missing, from education can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.
- Temporary staff and volunteers are made aware of the school's procedures for child protection and their responsibilities.
- The school remedies any deficiencies or weaknesses brought to its attention without delay and recognises the importance of utilising the expertise of the DSL and Deputies in shaping safeguarding arrangements.
- The school has appropriate filters and monitoring systems in place and regularly reviews their effectiveness.
- The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- Governing bodies should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs versus safeguarding risks. Over blocking of material which could restrict children's online learning will be avoided.
- The curriculum is delivered in such a way to include educating children about how to stay safe, which will include Relationship and Health Education (RHE), online safety and broader safeguarding messages within PSHE.
- Children are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including those who are victims of abuse and children with special educational needs or disabilities.
- The child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously and knowing they can safely express their views and give feedback.
- The governing body reviews the policies/procedures annually.
- A member of the governing body, usually the Chair, is nominated to liaise with the Designated Officer(s) from the relevant local authority and partner agencies in the event of allegations of abuse made against the headteacher.

Appendix 3

Definitions and Indicators of Abuse

Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

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 may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Neglect

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

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

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

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

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is regularly not collected or received from school
- The child is left at home alone or with inappropriate carers

Physical Abuse

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

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

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, such as a hand or a belt
- Bite marks
- Round burn marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather

- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

Sexual Abuse

Sexual abuse involves forcing or enticing a child 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 (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming them in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women can also commit acts of sexual abuse, as can other children.

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

- Sexually explicit play or behaviour, or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusual compliance
- Regressive behaviour, enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises or scratches in the genital area

Sexual exploitation

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

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

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)
- Entering and/or leaving vehicles driven by an unknown adult
- Possessing unexplained amounts of money, expensive clothes or other items
- Frequenting areas known for risky activities
- Being groomed or abused via the internet and mobile technology
- Having unexplained contact with hotels, taxi companies or fast food outlets

The Multi-Agency Information Submission Form will be used to share information with Bedfordshire Police that raises a concern around CSE and other forms of exploitation.

[Preventing Child Sexual Exploitation](#) from The Children's Society is utilised by the school to support our approach to this area.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on their 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 the 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 also involve seeing or hearing the ill-treatment of another person. 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 maltreatment

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

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

N.B. Some situations where children stop communication suddenly (known as 'traumatic mutism') can indicate maltreatment.

Responses from parents

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

- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to their age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home
- Violence between adults in the household

Disabled children

When working with children with disabilities, practitioners need to be aware of additional vulnerabilities to abuse and neglect, such as:

- Assumptions that indicators of possible abuse, such as behaviour, mood and injury relate to the child's disability without further exploration.
- Being more prone to peer group isolation or bullying than other children.
- Children with special educational needs and disabilities being disproportionately impacted by things like bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child.
- Not getting enough help with feeding, leading to malnourishment
- Poor toileting
- Lack of stimulation
- Unjustified and/or excessive use of restraint

- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment, for example callipers, sleep boards, inappropriate splinting
- Misappropriation of a child's finances
- Inappropriate invasive procedures

Appendix 4

Dealing with a Disclosure of Abuse

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

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

N.B. It is not the role of staff to seek disclosures; their role is to observe that something may be wrong, ask about it, listen, be available and make time to talk.

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

Immediately afterwards

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

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

Appendix 5

Allegations and concerns about a member of staff, governor or volunteer

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

Physical

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

Emotional

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

Sexual

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

Neglect

For example, failing to act to protect a child or children, failing to seek medical attention or failure to meet a child's basic needs.

Behaviours which may pose a risk

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

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

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

The headteacher will not carry out the investigation themselves or interview pupils.

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

The headteacher must exercise, and be accountable for, their professional judgement on the action to be taken, as follows:

- If the actions of the member of staff are felt likely to fall within the scope of the Interagency Allegation Management Procedures, the headteacher will notify the LADO. The LADO will liaise with the headteacher and advise on actions to be taken which will be in accordance with the Interagency Allegation Management Procedures.
- If the headteacher is uncertain whether the concern or allegation falls within the scope of the Interagency Allegation Management Procedures, a consultation with the LADO will take place and the advice provided will be acted upon. This consultation and the advice offered will be recorded and held on file.
- Where an allegation has been made against the headteacher, then the Chair of Governors takes on the role of liaising with the LADO in determining the appropriate way forward.

For details of this specific procedure, see CBSCP's [Allegations and Concerns regarding Staff, Carers and Volunteers Working with Children and Young People](#).

Concerns that do not meet the harm threshold

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

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

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside of the organisation
- As a result of vetting checks undertaken

The school understands that the term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in paragraph 430 of Keeping Children Safe in Education (2025).

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

The school has appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

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

As good practice, our governing body will:

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

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school's Low-Level Concerns Policy.

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

Where a low-level concern is raised about the DSL, it will be shared with the Chair of Governors.

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

All low-level concerns will be recorded in writing. The record will include:

- Details of the concern
- The context in which the concern arose
- Action taken
- The name of the individual sharing their concerns will also be noted, however if the individual wishes to remain anonymous then this will be respected as far as reasonably possible.

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

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

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

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

Appendix 6

Indicators of vulnerability to radicalisation

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

Extremism is defined by the Government in the Prevent Strategy as (Keeping Children Safe in Education (2025) page 157):

'Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.'

Extremism is defined by the Crown Prosecution Service as:

'The demonstration of unacceptable behaviour by using any means or medium to express views which:

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

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

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

Indicators of vulnerability include:

- Identity crisis – the child is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal crisis – the child may be experiencing family tensions; a sense of isolation; low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal circumstances – migration; local community tensions; events affecting the child's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of government policy.
- Unmet aspirations – the child may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement or reintegration.
- Special educational need – children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

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

More critical risk factors could include:

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

Appendix 7

Safeguarding in Specific Circumstances: Female Genital Mutilation

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

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

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

Effects of FGM

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

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

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

Why FGM is carried out

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

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

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

Where FGM is carried out

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

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

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

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

The law and FGM

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

- Perform FGM (including taking a child abroad for FGM)
- Help a girl perform FGM on herself in or outside the UK
- Help anyone perform FGM in the UK
- Help anyone perform FGM outside the UK on a UK national or resident

- Fail to protect a girl for whom you are responsible from FGM

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

The Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers (along with social workers and healthcare professionals) to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Possible signs and indicators of FGM

A girl or woman who's had FGM may:

- Have difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Have unusual behaviour after an absence from school
- Be particularly reluctant to undergo normal medical examinations
- Ask for help but may not be explicit about the problem due to embarrassment or fear

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

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

Further information can be obtained from:

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

[Pan Bedfordshire One Minute Guide Female Genital Mutilation](#)

Appendix 8

Safeguarding in Specific Circumstances: Youth Produced Sexual Imagery

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

Incidents covered by this policy:

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

Incidents not covered by this guidance:

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

The Law

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

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

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

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

These laws were not created to criminalise children but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. We believe children need education, support and safeguarding, not criminalisation.

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

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

Assessing the risks

The circumstances of incidents can vary widely. If at the initial review stage, a decision has been made not to refer to police and/or Children's Social Care, the DSL should conduct a further review (including an interview with the child or children involved) to establish the facts and assess the risks. When assessing the risks, the following should be considered:

- Why was the imagery shared?
- Was the child coerced or put under pressure to produce the imagery?

- Who has shared the imagery?
- Where has the imagery been shared?
- Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of the imagery?
- What is the impact on the child involved?
- Does the child involved have additional vulnerabilities?
- Does the child understand consent?
- Has the child taken part in this kind of activity before?

Informing parents/carers

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

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

Searching devices, viewing and deleting imagery

Viewing the imagery

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

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

- Is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the child or children involved).
- Is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the child or parent/carer in making a report.
- Is unavoidable because a child has presented an image directly to a staff member or the imagery has been found on a school device or network.

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

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

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the headteacher can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a child's mobile phone.

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

Further details on searching, deleting and confiscating devices can be found in the DfE [Searching, screening and confiscation in schools](#).

Appendix 9

Safeguarding in Specific Circumstances: Gang Involvement

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

Risk indicators may include:

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

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

Appendix 10

Safeguarding in Specific Circumstances: Child Sexual Exploitation

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

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

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

The key indicators of Child Sexual Exploitation include:

Health

- Physical symptoms (bruising suggestive of either physical or sexual assault)
- Chronic fatigue
- Recurring or multiple sexually transmitted infections
- Pregnancy and/or seeking an abortion
- Evidence of drug, alcohol or other substance misuse
- Sexually risky behaviour

Education

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

Emotional and Behavioural Issues

- Volatile behaviour exhibiting an extreme array of mood swings or use of abusive language
- Involvement in petty crime such as shoplifting, stealing etc.
- Secretive behaviour
- Entering or leaving vehicles driven by unknown adults
- Reports of being seen in places known to be used for sexual exploitation, including public toilets known for ‘cottaging’ or adult venues (pubs and clubs)

Identity

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

Relationships

- Hostility in relationships with staff, family members as appropriate and significant others
- Physical aggression
- Placement breakdown
- Reports from reliable sources (e.g. family, friends or other professionals) suggesting the likelihood of involvement in sexual exploitation
- Detachment from age-appropriate activities
- Associating with other young people who are known to be sexually exploited
- Known to be sexually active

- Sexual relationship with a significantly older person, or younger person who is suspected of being abusive
- Unexplained relationships with older adults
- Possible inappropriate use of the internet and forming relationships, particularly with adults, via the internet
- Phone calls, text messages or letters from unknown adults
- Adults or older youths loitering outside the home
- Persistently missing, staying out overnight or returning late with no plausible explanation
- Returning after having been missing, looking well cared for in spite of having no known home base
- Missing for long periods, with no known home base
- Going missing and being found in areas where they have no known links

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

Social Presentation

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

Family and Environmental Factors

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

Housing

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

Income

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

This list is not exhaustive.

Appendix 11

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

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

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

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

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

Further guidance can be found at:

[Pan Bedfordshire Practitioner's Guide to Information Sharing to Safeguard Children and Young People](#)
[Information Sharing](#)

Appendix 12

Operation Encompass

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

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

Please click [here](#) for more information.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00am to 1:00pm, Monday to Friday on 0204 513 9990 (charged at local rate).

Appendix 13

Searching procedures

Schools will have due regard to [Searching, screening and confiscation in schools](#) published by the DfE. The school may wish to explore a standalone policy around searching to safeguard children and practice.