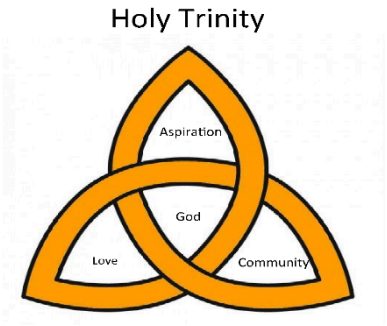
Holy Trinity CE Primary School

Keeping Children Safe in Education Policy 2025



If you are concerned about a child's welfare
see section 6 on page 13

Vision

Our vision is that children are nurtured to love learning, love one another and love God.

'Love learning, love one another, love God.'

Love the Lord your God with all your heart, soul, mind and strength and love your neighbour as yourself (Mark 12)

Pupil Voice: "It is important so the children can be treated with care and so that all the children are safe, happy and healthy."

Governors' Responsible	PPCC
Status	Statutory
Review Cycle	Annual
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1. Introduction and policy aims

This policy sets out how the governing board of the Holy Trinity CE Primary School & Nursery is carrying out its statutory responsibility to safeguard and promote the welfare of children in accordance with Section 175 of the Education Act 2002.

Mission Statement: To provide a home for all within a Christian community that inspires a love of learning.
Vision Statement: To have nurtured children to love learning, love one another and love God.

'Love learning, love one another, love God.'

Holy Trinity has a duty to keep children safe. This includes how we protect children from experiencing harm and how we should respond when we suspect or confirm that a child is being harmed.

Children are at the centre of everything we do at Holy Trinity. We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable and respectful. Adults in our school know that keeping children safe is everybody's responsibility and that all children, regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion have equal rights to protection and opportunities.

We aim to make sure that

- The school has a clear process in place, which is shared with and followed by all members of the school community when there is a safeguarding concern.
- Our staff are well trained to recognise the signs of abuse or neglect, such that they understand what their responsibilities are and how they should respond when they identify a concern.
- We keep track of children known or thought to be at risk of harm.
- We communicate well with all those involved when there is a concern about a child, including parents/carers, pupils, staff and agencies. This includes sharing information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time.

2. Definitions

Safeguarding means the process for protecting children from harm and abuse, whether that is within or outside the home, as well as online. This includes

- taking action to ensure that children have the best outcomes
- making sure that the way children grow up is consistent with providing safe and acceptable care
- preventing barriers to children's mental and physical health or the way they develop
- providing help and support to meet the needs of children as soon as problems emerge

Child protection means the processes carried out to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, and in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, governors, supply staff and self-employed staff.

Child means everyone under the age of 18.

Parent means birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

Statutory means what has been decided or is controlled by the law. **Statutory guidance** tells us what schools and local authorities must do to follow the law.

The local safeguarding children partnership has three safeguarding partners:

1. the chief officer of police for an area falling within the local authority (police)
2. the local authority (children's services), and
3. the Integrated Care Board for an area within the local authority (health)

In Kingston and Richmond, the local safeguarding children partnership (KRSCP) considers education as the fourth safeguarding partner. Partners work together to identify the safeguarding needs of the local area and come up with a joint response to address them. Wherever local safeguarding arrangements are referred to in this policy, they mean the arrangements agreed and published by KRSCP or the London Child Protection Procedures and Practice Guidance.

Holy Trinity will publish our safeguarding and child protection policy on our website and hard copies will be available on request from the school office.

3. Key personnel

Designated Safeguarding Lead (DSL) **Mr Andy George** ageorge@htprimary.com	**Deputy Designated Safeguarding Lead** **Mrs Claire Bell** cbell@htprimary.com	**Deputy Designated Safeguarding Lead** **Miss Sophie Brunt** sbrunt@htprimary.com
Deputy Designated Safeguarding Lead **Miss Louisa Allard** lallard@htprimary.com	**Co- chair of Governors, Designated Governor for Safeguarding** **Mr Francis Neal** fneal@htprimary.com	**Deputy Designated Governor for Safeguarding** **Ms Helen Taylor** htaylor@htprimary.com

Our School Health & Safety Officer is: April Owens
Our Police School Safety Officer is: PC Yazad Yazad.BACHA@met.police.uk

Children's services

Achieving for Children (AfC) single point of access (SPA)

Anyone can tell SPA about a child, young person or parent/carer who needs support in the boroughs of Kingston and Richmond. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

SPA can be contacted on the Single Point of Access (SPA) website.

If a child is in **immediate danger**, the police should be contacted on 999.

If it is not an emergency, but there is a concern that a child is at risk, SPA should be contacted by phone on 020 8547 5008. If it is outside of office hours and urgent, the SPA duty social worker can be spoken to on 020 8770 5000.

This government website will help identify which local council to report child abuse to and their contact details: Report child abuse to a local council - GOV.UK

Go to section 6 of this policy for in-school procedures.

Local authority designated officer (LADO)

Every local authority has a legal responsibility to have a LADO who is responsible for organising the response to concerns/allegations that an adult who works with children may have caused them or could cause them harm. They will be informed within one working day of any allegations that come to our attention. The LADO will give advice and guidance to employers, such as the headteacher and the chair of governors, to make sure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

The LADO can be contacted by:

Email: LADO@achievingforchildren.org.uk

Telephone: 07774 332675

Online: LADO referral form

4. The law (legislation) and statutory guidance

In addition to KRSCP's arrangements and the London Child Protection Procedures and Practice Guidance, Holy Trinity also follows the laws and statutory guidance below:

Keeping children safe in education 2025, from now on referred to as KCSIE, sets out the legal duties all schools must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges. Make sure this link reflects the latest guidance in September 2025.

Statutory framework for the early years foundation stage 2025 sets the standards that all early years providers, such as nurseries, must meet to make sure that children learn and develop well and are kept healthy and safe. Remove if this does not apply to your setting.

Working Together to Safeguard Children 2023 guidance produced by the government states how practitioners, such as teachers, social workers, the police and health professionals working with children and families should work together to make sure that children and young people remain safe from harm.

Education Act 2002, Section 175/The Education (Independent School Standards) Regulations 2014/Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015 places a duty on maintained/independent schools (including academies)/non-maintained special schools and local authorities to keep children safe and promote their welfare.

The Children Act 1989 is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It also provides the legal framework for the child protection system. The 2004 amendment is used alongside the Act.

The Children Act 1989 Care Planning, Placement and Case Review sets out what responsibilities education settings have for children looked after by the local authority.

The Human Rights Act 1998 sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (the Convention) that apply in the UK. Experiencing harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights.

The Equality Act 2010 states that schools and colleges must not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (called protected characteristics). Therefore, we can take positive action to deal with disadvantages affecting our children with protected characteristics to make sure their needs are met. The Equality Act 2010: advice for schools advises us further.

The Public Sector Equality Duty (PSED) states that we have to be mindful of the need to eliminate unlawful discrimination, harassment and victimisation. Some children may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination. It is important to make sure we foster good relations between those who share a protected characteristic and those who do not, and work to make sure children have equal opportunities. We give specific attention to this duty when we write our policies or make any decisions about how our school is run.

More legislation is covered throughout this policy in their relevant sections. Some government guidance is not statutory - instead it supports practitioners, like school staff, in the decisions we make to keep children safe. Where possible, links to non-statutory guidance have been included in the relevant sections.

We will ensure that all staff read and understand:

- Holy Trinity CE Primary School & Nursery's Safeguarding and Child Protection policy
- Holy Trinity CE Primary School & Nursery's online safety policy
- Keeping Children Safe in Education (2022) [Part One] and school leaders and staff that work directly with children will also read Annex B
- Holy Trinity CE Primary School & Nursery's Behaviour Policy & Anti Bullying policy
- Holy Trinity CE Primary School & Nursery' Staff Code of Conduct

We will ensure that all staff are aware of:

- the safeguarding response to children who go missing from education
- The role of the Designated Safeguarding Lead
- The identity of Holy Trinity CE Primary School & Nursery's Designated Safeguarding Lead and Deputies
- The additional vulnerabilities of children who are looked after/previously looked after, children with Special Educational Needs and Disabilities and children who are young carers.

Copies of the above documents will be provided to all staff as part of the induction process.

Holy Trinity CE Primary School & Nursery will publish our Safeguarding and Child Protection policy on our website and hard copies will be available on request from the school office.

The roles of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads will be explicit in their job descriptions and we will ensure that they have the time and resources to fulfil their duties.

5. Roles and responsibilities

Everybody in our school has a responsibility for safeguarding. Some members of our school have specific safeguarding responsibilities.

The Governing Board

The non-statutory Maintained schools governance guide sets out the roles, responsibilities and legal duties for governing boards.

- Safeguarding, and the child's best interests, wishes and feelings, are considered in everything the school does. Everyone at the school is involved in the whole school approach to safeguarding and online safety is a theme throughout.
- The school's policies, procedures and training follow the local safeguarding children partnership arrangements and the law, including the school's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.
- The school's leadership team are held to account for the school's safeguarding arrangements.
- The school submits the safeguarding self-audit to the local safeguarding children partnership annually.
- Safeguarding is a standing item on the agenda for governor meetings.
- The appointed designated safeguarding lead (DSL) is given the additional time, funding, training, resources, and support needed to carry out the role effectively.
- A governor with senior board level lead takes leadership responsibility for the school's safeguarding arrangements (known as the safeguarding link governor).
- There is an appointed designated teacher for looked after children who is appropriately trained.
- The board takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect affecting pupils with special educational needs and disabilities (SEND).
- Child protection files are maintained as set out in Annex C of KCSiE.
- The school adds to multi-agency working and shares information appropriately and in a timely manner.
- All staff receive regular safeguarding information, updates and in-depth training.
- Staff read the appropriate part of KCSiE. All governors sign to say they have read and understood KCSiE and this policy.
- Pupils are taught about keeping themselves and others safe, including when online.
- The board does all that they reasonably can to limit children's exposure to online risks from the school's online IT systems and assign a member of the senior leadership team and a governor to ensure standards are met.
- Appropriate safer recruitment processes and procedures are in place.
- Procedures are in place to identify and address children absent from education, including persistent absence and when safeguarding concerns coincide.
- There are procedures for reporting and managing safeguarding concerns about adults who work for the school. The chair of governors/chair of trustees will manage any allegations against the headteacher.
- There are effective safeguarding arrangements for when the site is being hired/let.
- Alcohol is not consumed by staff on school trips or events on or off site.
- All members of the governing board receive safeguarding training at induction, which is regularly updated.

The safeguarding link governor - Francis Neal

- They meet regularly with the DSL and visit the school asking questions, which allows them to monitor how the school's safeguarding policies and procedures are being put into practice.
- Each year, they are part of the annual safeguarding audit, led by the DSL and headteacher, and make sure it is submitted to the KRSCP.
- They are the governing board's safeguarding specialist, feeding back their findings following school visits and meetings with the DSL.
- They attend appropriate training that guides them in how to monitor and progress any areas of weakness in the school's safeguarding arrangements.
- They keep up to date with the KRSCP's safeguarding arrangements and guidance.

The headteacher – Andy George

- This policy and other safeguarding-related policies and procedures (such as the staff behaviour policy) are shared at induction, understood by all staff, including temporary staff and volunteers, and are being followed at all times.
- Staff receive regular safeguarding training, which is updated regularly.
- Parents and carers are aware of this policy and where they can access a copy.
- The DSL is given the additional time, funding, training, resources, and support needed to carry out the role effectively and there is cover by an equivalently trained deputy if the DSL is absent.
- Visitors are appropriately supervised or escorted, where necessary.
- Systems are in place for children to express their views and give feedback, which are used to inform the whole school approach to safeguarding.
- They become the 'case manager' when an allegation is raised about a member of staff (see Appendix 2) and make the final decision regarding all low-level concerns.
- Appropriate arrangements are put in place for the supervision of staff who have contact with children and families.
- There are enough staff per child (staff ratios), where relevant and applicable.
- The procedures for eating arrangements, food preparation and management of allergies are aligned with the EYFS statutory guidance and clearly explained in the school's supporting pupils with medical conditions policy.
- Each child in the Early Years Foundation Stage is assigned a key person.

The designated safeguarding lead (DSL) – Andy George

Andy George has the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL is a senior member of staff from our school's leadership team. Holy Trinity has deputy DSLs to support the DSL in their role. While the DSL may hand over some activities to a deputy, the DSL will always have the ultimate responsibility for keeping children safe.

The full responsibilities of the DSL and the deputy DSL(s) are listed in their job descriptions. The DSL's responsibilities include, but are not limited to

- reading and following KCSiE
- always being available during school hours for staff in school to discuss any safeguarding concerns, or arrange appropriate cover for any out of hours or out of term activities
- working together with all staff to understand the whole picture when there are safeguarding concerns, providing them with advice, support and expertise
- contributing to the assessment of children, including taking part and/or supporting other staff to take part in strategy discussions and meetings between multiple agencies
- working together with and supporting parents/carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents/carers aware of Holy Trinity's role in making referrals about suspected abuse, neglect and exploitation
- understanding the importance of sharing information, including referring cases to relevant agencies (for example, children's services, the police, the Channel Programme and/or the Disclosure and Barring Service (DBS)) when appropriate, and supporting staff who make referrals directly
- understanding and following AfC's and KRSCP's safeguarding procedures, in addition to attending the termly DSL forums provided by KRSCP to ensure they are acting in line with the local safeguarding arrangements
- keeping the headteacher up to date with safeguarding issues
- having the lead responsibility for online safety, and oversight and checking the effectiveness of filtering and monitoring systems and their reports
- being aware of the requirement for children to have an Appropriate Adult, as described in PACE Code C 2019
- working with the 'case manager' and LADO for child protection concerns that involve a staff member
- making sure child protection files are up to date and kept as per section 8
- making sure all staff have access to this policy (and the wider safeguarding procedures) and that the policy is available publicly and reviewed annually
- making sure that all staff (including third-party staff and contractors) have an adequate and appropriate safeguarding induction, regularly updated safeguarding training and annually sign to say they have read the relevant part of KCSiE
- working alongside the governing body and headteacher to update and review procedures and how they are being implemented, including jointly completing an annual safeguarding self-audit and submitting it to KRSCP
- promoting the educational outcomes of pupils who have or had a social worker, by sharing information about child protection issues with teacher and leadership staff
- encouraging a culture of listening to children, taking into account their wishes and feelings when any plans are put in place to protect them

A deputy designated safeguarding lead – Lucy Ashby, Sophie Brunt and Louisa Allard

- is trained to the same standard as the designated safeguarding lead
- will take on the designated safeguarding lead's responsibilities if they are unavailable. If the designated safeguarding lead is long-term absent, a deputy will temporarily take over as the designated safeguarding lead

Further responsibilities of the DSL are listed elsewhere in this policy. For a detailed explanation of the DSL's responsibilities, see Annex C of KCSiE.

IT provider

- maintains the filtering and monitoring systems
- providers filtering and monitoring reports
- completes actions following concerns or checks to the system

All school staff

- sign to say they have read the relevant part of KCSiE annually
- have a responsibility to provide a safe environment in which children can learn
- will follow the school's procedures for identifying and reporting any concerns and issues about the school's online filtering and monitoring systems
- will follow the school's safeguarding and child protection processes and procedures, sharing information quickly when they have a concern about a child's safety and wellbeing, even when they are unsure
- will, whenever necessary, refer safeguarding or child protection concerns to external agencies, such as the police, children's services and LADO
- create a culture where children who identify as lesbian, gay, bisexual, transgender (LGBT) or are gender questioning feel safe, can speak out and share concerns
- attend safeguarding training appropriate to their role and are familiar with key policies, including this policy and the staff behaviour policy (code of conduct)

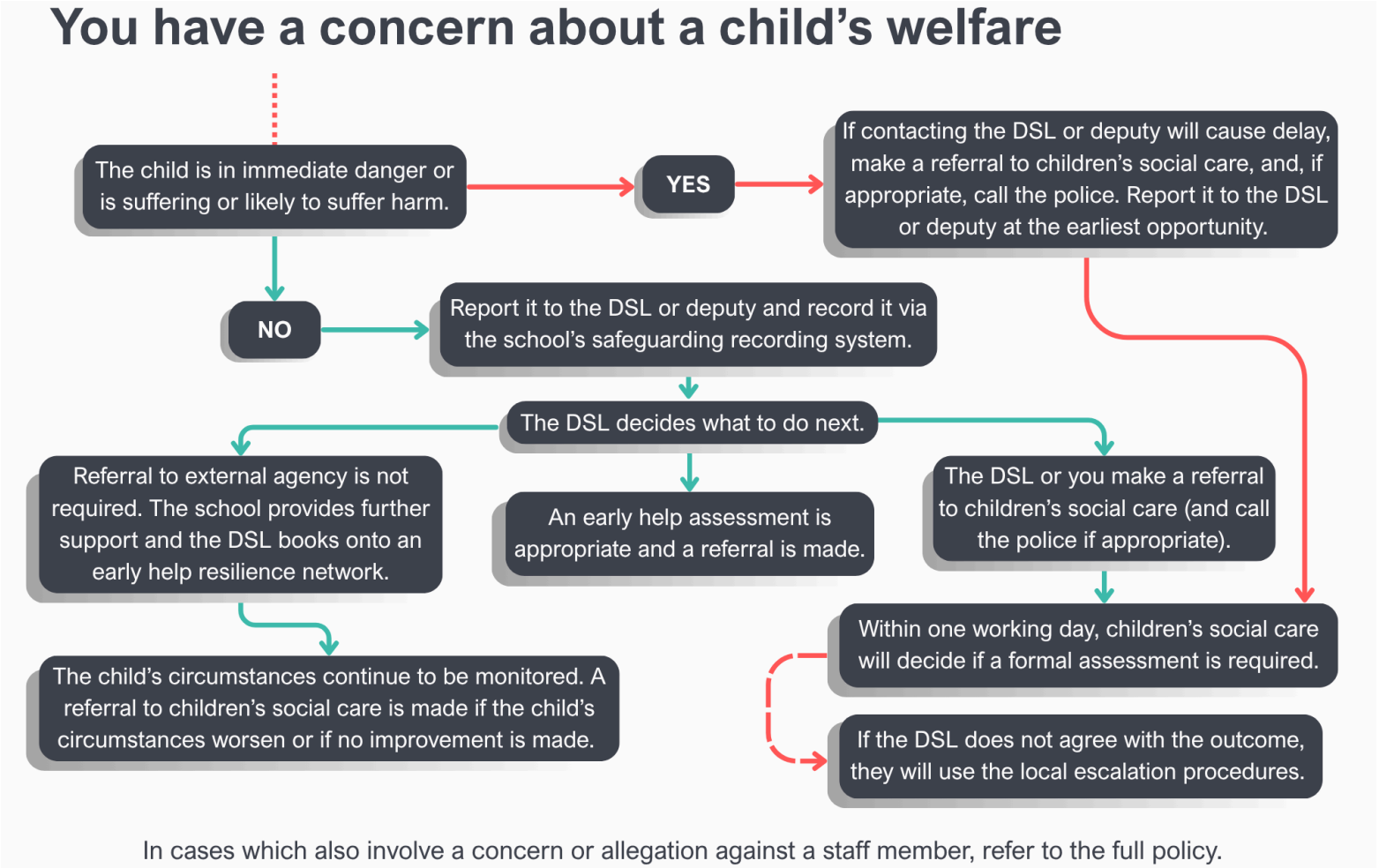
Alcohol

- There will be no use of alcohol by staff while responsible for students.
- There will be no use of alcohol by staff or students on school trips or at residential units.
- When alcohol is present on site (e.g. on a Tombola or Raffle) and particularly if it is being consumed (e.g. mulled wine at a Christmas Fair) a member of the PTA will be appointed as a Designated Premises Supervisor and will be responsible for ensuring the following:
- No school pupil or anyone under the age of 18 served alcohol
- No alcohol is served to anyone who appears intoxicated
- Any alcoholic prizes will be given directly to an adult
- Parents donating alcohol will be encouraged to bring bottles straight to the school office rather than sending the alcohol into school with a child.

What staff need to know is covered in the training section of this policy.

6. What to do if you have concerns about a child's welfare

If staff have any concerns about a child's welfare, they must act on them immediately by following the procedures below.



In cases which also involve a concern or allegation against a staff member, refer to the full policy.

Our staff can use the What to do if you're worried a child is being abused government guidance alongside the school's procedures. We work hard to make sure our staff and safeguarding team are

approachable and available, such that anyone can speak to them about any concern quickly, no matter how small or whether there is evidence.

We recognise the significant emotional impact being involved with, or aware of, safeguarding incidents can have. **Approach our safeguarding team if you need any support during or following a safeguarding incident you have been involved in.** The names of the DSL and deputy are clearly advertised in the school. A visitor safeguarding leaflet is provided for those unfamiliar with the school upon signing in.

If a child is in immediate danger, or is suffering or likely to suffer significant harm

Call the police on **999** if a child is in immediate danger. **Anyone** can make a referral to children's services if a child is suffering or likely to suffer significant harm. Usually, the DSL or deputy makes the referral. For children's services' contact details, **click here** or go to page 4. If you make a direct referral, you will update the DSL or a deputy as soon as is practically possible.

Disclosures

We recognise that it takes a lot of courage for a child to disclose they are being harmed. Staff know that

- children may not feel ready or know how to tell someone they are being harmed
- the child may not realise what is happening to them as harmful
- they may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers

Our staff know they must show professional curiosity, i.e. explore and try to understand what is happening for an individual or family, rather than take what is being said on face value or making assumptions. We encourage staff to ask the pupil if they are OK or if they can help in any way.
A child who makes a disclosure may have to tell their story more than once, such as to the police and/or social workers. At Holy Trinity, we know how important it is that a child's first experience of talking to a trusted adult about a worry they have is a positive one.

Handling a disclosure

- listen to them carefully and believe in what they are saying. Do not be afraid of silent moments
- be careful not to express your own views or feelings and stay calm
- do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a deputy. Only ask open questions, such as: How? When? Who? Where?, and open statements, such as: "Tell me", "Describe" and "Explain". Otherwise, you may invalidate your evidence (and the child's) in any later court proceedings
- if there are injuries or marks on the child, do not examine the child intimately or take pictures

- reassure them that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner
- do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted
- tell the child it is not their fault and you are taking them seriously
- explain what you will do next. Tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help

After a child has made a disclosure

- write up the conversation as soon as possibe
- make sure the DSL or a deputy is aware of the disclosure. If appropriate, contact children's services and/or the police directly and tell the DSL as soon as possible
- do not share the disclosure with **anyone** else unless children's services, the police or another relevant agency involved in the safeguarding process tells you to
- get support for yourself if you need it

Recording a disclosure or safeguarding concern

- record the date, time, place and persons present on CPOMS
- use the child's own words, verbatim where possible, and stick to the facts. Avoid making assumptions and do not put your own judgement on it
- record any noticeable non-verbal behaviour. Detail any visible marks or injuries and record them on a body map
- keep any original notes you have made on file
- do not ask children to make written statements themselves or sign records

Concerns about a child who is not in immediate danger, or is suffering or likely to suffer significant harm

The flowchart on page 14 explains what you should do if you have concerns about a child. First, speak to the DSL or a deputy. If in exceptional circumstances, the DSL or a deputy are not available, this will not delay you from taking appropriate action. Instead, you will speak to a member of the senior leadership team or take advice from children's services, if necessary.

Early help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

At Holy Trinity, we are keen to provide support to families as soon as a problem becomes visible. If an early help assessment is appropriate, the DSL or a deputy will lead on working together with other agencies and set up an inter-agency assessment, as appropriate. Staff may be required to

support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

Our DSL and/or deputy use the Early Help Partnership Tool to explore emerging needs and – with consent from the child or family – discuss with the relevant Early Help Resilience Network to ensure all identified needs are supported effectively and they get multi-agency support. Achieving for Children's early help assessment tools and plans can be found here. The partnership's Early Help Strategy sets out their aims for how professionals work effectively together to provide early help.

If early help support is appropriate, it will be kept under constant review. A referral to children's services may be required if the child's situation doesn't appear to be improving. The DSL is aware of the local escalation policy and procedures.

We are aware any child may benefit from early help. Staff who work directly with children will be particularly alert to the potential need for early help for children listed under Part 1, paragraph 18 of KCSiE.

Referral to children's services

Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to children's services is appropriate. The DSL and deputy are aware of the London safeguarding children partnership's threshold document, which will be used to inform their response to any safeguarding concern. Whenever the DSL or deputy are unsure whether the threshold for a referral has been met, they will consult with the Single Point of Access. If a referral is needed then the DSL should make it. However, anyone, including children, can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

If you have not had any feedback from children's services within 72 hours of making the referral, this must be followed up. If after a referral, the referrer is dissatisfied with the response from children's services and/or the child's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves. The local resolving professional differences procedure will be used, where necessary.

If a child is at risk of female genital mutilation or it has taken place

Female genital mutilation (FGM) is illegal in England. It involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'.

Teachers

For this section only, teachers means qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions.

All staff should speak to the DSL (or a deputy) when a concern about female genital mutilation (FGM) arises. If a teacher suspects that FGM has been carried out on a child or believes that the child is at risk of FGM, they will follow their internal safeguarding procedures.

Teachers who come to know, in the course of their work, that FGM has been carried out on a child **must directly** report this to the police. Failure to do so will result in disciplinary sanctions. The teacher should tell the DSL or a deputy who will support them in making a direct report to the police. The teacher may need to support a referral to children's services. Staff will never examine children.

Other members of staff

Other members of staff who establish that an act of FGM appears to have been carried out on a child or suspect a child is at risk of FGM, will follow the same procedures as with any other concern, i.e. staff will speak to the DSL or a deputy and follow local safeguarding procedures.

Concerns about nudes or semi-nudes

Responding to any incident that comes to your attention:

- **Report** it to your designated safeguarding lead (DSL) or equivalent immediately using the school's reporting procedures set out in this policy.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- **If you have already viewed the imagery** by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not delete** the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or a deputy.
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL or a deputy.

Staff reserve the right to confiscate a device in the possession of a pupil if they have concerns about sharing nudes or semi-nudes in relation to the device. This is consistent with the government's Searching, screening and confiscation: advice for schools guidance.

The DSL will follow the government's Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance. Once they are aware of an incident, the DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

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

- whether there is an immediate risk to any child or young person
- if a referral should be made to the police and/or children's social care
- if it is necessary to view the image(s) in order to safeguard the child or young person – in most cases, images or videos should not be viewed
- what further information is required to decide on the best response
- whether the image(s) has been shared widely and via what services and/or platforms. This may be unknown
- whether immediate action should be taken to delete or remove images or videos from devices or online services
- any relevant facts about the children or young people involved that would influence risk assessment
- if there is a need to contact another education setting or individual
- whether to contact parents or carers of the children or young people involved – in most cases they should be involved

The DSL will make an immediate referral to the police and/or children's services if

- the incident involves an adult.
- there is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- what they know about the images or videos suggests the content depicts sexual acts that are unusual for the young person's developmental stage, or are violent.
- the images involves sexual acts and any pupil in the images or videos is under 13.
- they have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, if they are presenting as suicidal or self-harming.
- they become aware of a computer-generated indecent image of a child, commonly called 'deep fakes' and 'deep nudes' i.e. a digitally manipulated or artificial intelligence-generated nude and semi-nude.

If none of the above applies, we can decide to respond to the incident without involving the police or children's services. We may escalate the incident at any time if further information/concerns are disclosed at a later date. First, the DSL will be confident that they have enough information to

assess the risks to any child involved and the risks can be managed within our school's pastoral support, behaviour procedures and, if appropriate, the local network of support.

The DSL or a deputy will contact children's services if any child or young person involved is already known to them. If, because of the investigation, the DSL (or equivalent) believes there are wider issues that meet the threshold for children's services' involvement, they will make a referral in line with this policy and local safeguarding procedures.

Viewing the imagery

The decision to view any imagery will be based on the professional judgement of the DSL or a deputy and will comply with this policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a pupil. If a decision is made to view imagery, the DSL will be satisfied that viewing

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved
- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child, parent or carer in making a report
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on a school device or network

Deletion of images

If the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online to limit any further sharing. This decision will be based on the DSL's or a deputy's judgement in line with the guidance.

There is further information in the Sharing nudes and semi-nudes section of this policy.

Child-on-child abuse, including sexual violence and sexual harassment

Responding to allegations of child-on-child abuse

- Follow the 'handling a disclosure' procedure set out above. You must make a record of the allegation and inform the DSL or a deputy.
- If the DSL and a deputy are not available due to emergency circumstances, the staff member will speak to a member of the senior leadership team and/or contact the relevant children's services e.g. the Single Point of Access in Kingston and Richmond.

The DSL or a deputy will make a decision from the following options depending on the level of risk or harm:

1. Manage the concern internally providing pastoral support to all those involved.
2. Complete an early help assessment.

3. Make a referral to children's services and/or, where necessary, the police. The DSL may choose to consult children's services to assist them with making a decision.

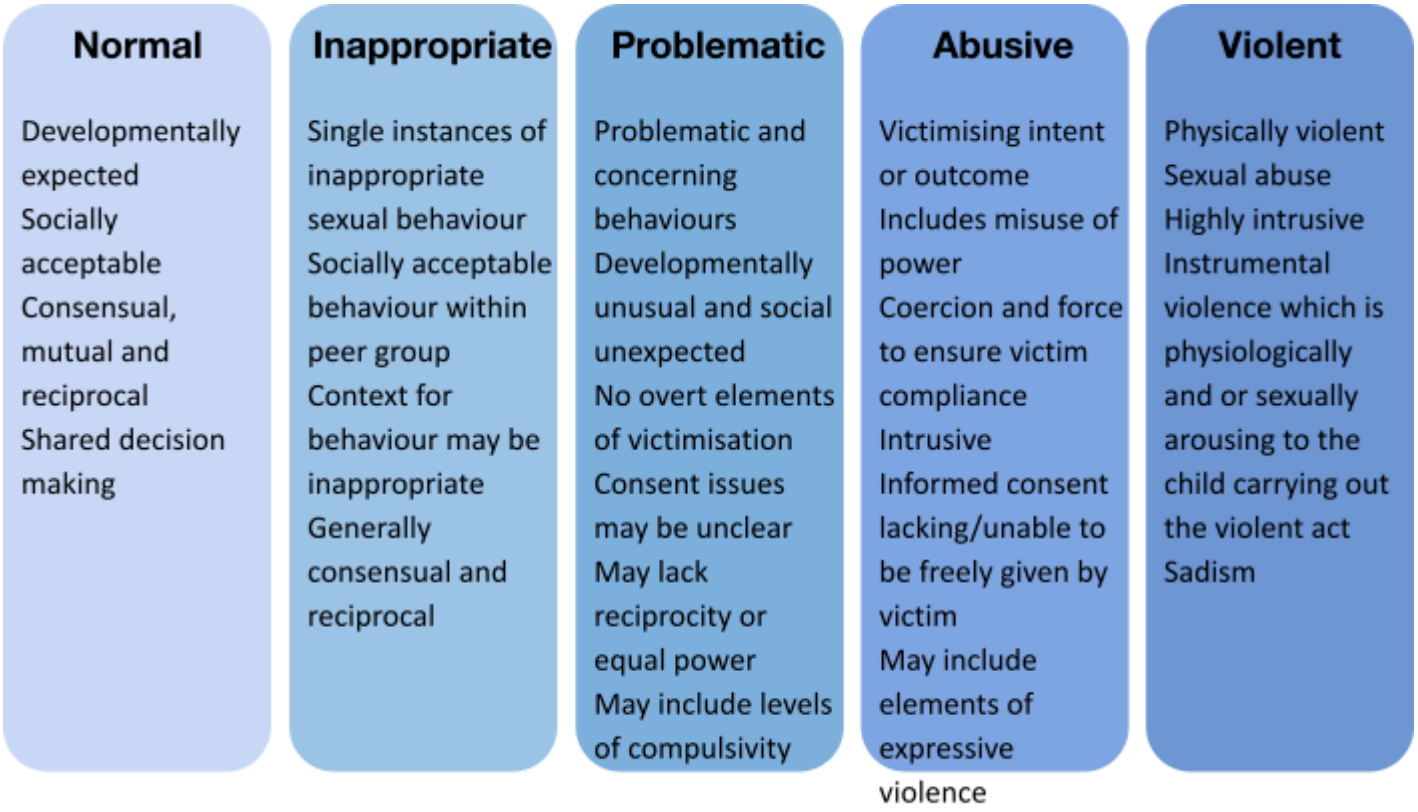
4. The police will still be informed of any criminal offences, even if the child is aged under the criminal age of responsibility. The police will take a welfare approach.

The DSL or a deputy will contact the parents or carers of the children involved at the earliest opportunity and where appropriate. Records will be kept of all concerns, any discussions had and any outcomes reached. If a criminal offence has been committed or is being investigated, the DSL will work closely with the police to avoid impacting the criminal process while protecting children or following disciplinary procedures.

Where the DSL, children's services or the police decide the concern should be handled by the school internally, we will thoroughly investigate the concern using our behaviour policy and processes. A risk assessment and prevention plan will be completed when a safeguarding risk has been identified. The plan will be monitored and a date set for a follow-up evaluation with everyone concerned. We will seek to provide support to all children involved in the incident, including the child/ren who displayed the behaviour and the children who experienced it.

Responding to allegations of sexual harassment and sexual violence

Using the DSL's or a deputy's professional judgement, the school will make decisions about and address the incident based on the Hackett tool (diagram below). We will request the support of other agencies, such as children's services and the police, if necessary.
We follow the local safeguarding arrangements below when an allegation of sexual violence and/or sexual harassment has been made.
Hackett Inappropriate: Manage internally using the behaviour policy and pastoral support.
Hackett Problematic: Early help response used for non-violent harmful sexual behaviour to prevent escalation.
Hackett Abusive: Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.
Hackett Violent: Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault, following the When to call the police guidance.



The management of children and young people with sexually harmful behaviour is complex. Holy Trinity will work with other relevant agencies to maintain the safety of the whole school community. Where appropriate, immediate measures will be put in place to support and protect the person impacted by the behaviours, any witnesses and the alleged instigator of the behaviours. A written record will be made and next steps discussed, taking into account the views of those impacted by the behaviour.

A risk and needs assessment will be completed for all reports of sexual violence and on a case by case basis for reports of sexual harassment. The assessment, which will be kept under review, will consider

- whether there may have been other people impacted by the behaviour
- the person known to be impacted by the behaviour, especially their protection and support
- the alleged instigator of the behaviour
- all pupils (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them from the alleged instigator or from future harm
- the time and location of the incident and any action that can make the school safer

Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the pupil and/or the person who has made the allegation is in need of help, or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's services may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate according to our behaviour policy.

If a child who has experienced sexual violence or sexual harassment asks the school not to make a referral

If the child does not give consent to share information, the DSL or a deputy will balance the victim's wishes against the DSL's or a deputy's duty to protect them and other children on a case by case basis. If a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and as rape, assault by penetration or sexual assault are crimes, reports should be referred to the police. Although the age of criminal responsibility is ten, if the child accused is under ten, a referral to the police will still be made. The police will take a welfare, rather than a criminal justice approach, in these cases.

We will do all we reasonably can to protect the anonymity of any children involved in any report, including weighing up which staff need to know and any support which will be put in place. Further, we will take into account the potential impact of social media in facilitating the spreading of rumours and exposing the child's identity.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, our DSL and a deputy will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. They will be guided by the CPS: Safeguarding Children as Victims and Witnesses advice.

Concerns about mental health

If you have a mental health concern about a child that is also a safeguarding concern, you will speak to the DSL or a deputy immediately, unless the child is in immediate danger, in which case you will call the police first.

Although you may be well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, only appropriately trained professionals should attempt to diagnose a mental health illness. Where necessary, the DSL or a deputy will make a referral to the Child and Adolescent Mental Health Service's (CAMHS) single point of access for Kingston and Richmond here.

Concerns about extremism and radicalisation

Extremism is the vocal or active opposition to our fundamental British values. Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.
If you have a concern that a child may be at risk of radicalisation or involvement in terrorism and they are in immediate danger or there is risk to life, contact the police on 999. If the child is not in immediate danger, speak with the DSL or a deputy in the first instance.
The DSL will respond in line with the local referral pathway. They may decide to discuss their concerns with the Council Prevent lead and/or children's services and will make referrals to the police Prevent team and/or the Channel programme where appropriate. The DSL will need to seek the individual's consent when referring to the Channel programme. The DSL will report any online material they become aware of that promotes terrorism or extremism via the Government's online service.
All staff and governors can also raise concerns by emailing counter.extremism@education.gsi.gov.uk, but this is not to be used in emergency situations. If you believe you have information relating to terrorism, you can call the anti-terrorist hotline on 0800 789 321. To report extremism in education, including allegations against staff and institutions, use this link.
The Prevent lead in Richmond is:
Naheem Bashir, Hate Crime and Prevent Coordinator
Richmond and Wandsworth Prevent referral pathway
See radicalisation and extremism in Appendix 1 for wider information.

How pupils can report concerns

In our school, it is essential that pupils can tell us how they are feeling and know we will take seriously anything they share with us. We aim to create an environment full of 'reachable moments' which encourages pupils to feel safe enough to open up if they are concerned about something. Pupils can confidently report any worries they have about their lives, both in and out of school, by speaking to an adult they trust or putting a written or an anonymous disclosure in worry box.

We know children try to get their voice heard not just through what they say but how they behave, as pointed out in the NSPCC's voice of the child briefing. When there are behavioural issues or changes in a child's behaviour we take a safeguarding first approach, including considering if the child is communicating an unmet need and/or abuse. For children who are pre-verbal or non-verbal, observing behaviour and presentation is even more important for understanding the child's lived experience.

7. Confidentiality

Holy Trinity takes our responsibility to protect and look after the data (information) we hold about pupils and our families seriously. The Data Protection Act (DPA) 2018 and General Data Protection Regulation (GDPR) guide us in how to do so. Under the DPA 2018, we will share information without consent if 'the safeguarding of children and individuals at risk' is our reason for doing so, and

- it is not possible to gain consent
- it cannot be reasonably expected that a practitioner (for example, teacher) gains consent, or
- to gain consent would place a child at risk

The government's information sharing advice for safeguarding practitioners, which includes the seven 'golden rules' for sharing information, supports staff who have to make decisions about sharing information. Staff are aware they can look at the data protection in schools toolkit or speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children."

We will share information in a timely manner to keep children safe, which will include sharing information with agencies and professionals in line with the Working Together to Safeguard Children 2023 guidance. DRAFT Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers We respect that safeguarding matters are personal to families, so the DSL, deputy and headteacher will only share information about a child to members of staff and professionals on a need to know basis.

All staff are aware that they cannot make a promise to a child to keep secrets that might impact on the child's safety or wellbeing. Instead, staff should tell the pupil that they may need to pass information on to others who can help and protect them.

Notifying parents or carers

At Holy Trinity, working alongside and supporting families is a key priority. This involves being open and transparent with parents and carers when we have concerns about their child's welfare, and/or we need to request support from other services to make sure the child's situation improves. If we believe notifying parents or carers could increase the risk to the child or cause further harm, we will seek advice from children's services about how and when parents or carers should be updated.

It is legitimate to share concerns without a parent's or carer's consent when there is good reason to do so and that sharing the information would improve the safeguarding of the child in a timely manner.

8. Record Keeping

Each child has a safeguarding file where all safeguarding concerns and referrals are stored. The designated safeguarding lead is responsible for keeping written records of all concerns, discussions and decisions, including the rationale for those decisions. Records reflect the reason why referrals are or are not made to another agency, such as children's services or the Prevent program. Safeguarding files will be stored securely and access will only be given to those who need it.

When pupils leave Holy Trinity, the school will make sure that their safeguarding file is transferred to the new education setting or college within 5 days of an in-year transfer or within 5 days of the start of a new term. This will be securely transferred separately from their main pupil file and a confirmation of receipt will be requested and kept. Where appropriate, the DSL will share information in advance of the pupil transferring so support can be put in place ready for when the pupil starts. When a child starts our school, we will make sure key staff are aware of the safeguarding file as soon as possible.

Holy Trinity School uses CPOMS to maintain confidential safeguarding information.

9. Concerns or allegations about adults in our school

If you have a low-level concern, or an allegation is made, about a member of staff (see the definition for staff in section 1 of this policy) presenting a risk to children, speak to the headteacher as soon as practically possible. This includes any concerns in school, out of school, online and/or offline.

If the low-level concern or allegation is about the headteacher, contact the chair of governors, whose details are at the start of this policy.

If you are unable to report to the headteacher or chair of governors either because they are not available or because you believe that there is a conflict of interest, share your concerns with the local authority designated officer (LADO), whose details are at the start of this policy.

Appendix 2 sets out what steps the headteacher or chair of governors will then follow if appropriate.

10. Whistleblowing

A whistleblower is a worker who reports certain types of wrongdoing and all staff have a duty to do so. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Any concerns should be raised with the senior leadership team and will be taken seriously. Holy Trinity has a separate whistleblowing policy, which lists the procedures for raising concerns. This can be found on the Safeguarding Notice Board on the way into the staff room or on the server.

Where staff feel unable to raise a concern with our senior leadership team, or feel that their genuine safeguarding concerns are not being addressed, there are other options available to them, such as the NSPCC whistleblowing advice line. Staff can call: 0800 028 0285 from 8am-8pm or email: help@nspcc.org.uk.

11. Online safety and the use of smart devices

This section summarises Holy Trinity's whole school approach to online safety and the use of smart devices (e.g. mobile phones, smart watches, tablets etc). Our detailed approach is covered in our Online Safety Policy. Holy Trinity understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety in every aspect of school life.

Our aim is to

- have in place processes about online safety that protect our children and staff, including how we identify, intervene in and escalate any online concerns where appropriate
- make sure technology is used responsibly and safely through education
- set clear expectations for the use of mobile phones and smart technology

We fulfil our aims by

- educating children to learn how to keep themselves safe when online (using the government's Teaching online safety in schools guidance), what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety
- engaging with parents and carers about what online safety looks like
- making sure our whole school approach is reflected in all relevant policies
- regularly training staff on online safeguarding risks and how to be online safely
- making sure children, staff, parents/carers, governors and volunteers sign an understandable acceptable use agreement, which covers how they should use the school's IT systems and their mobile and smart technology
- making parents, carers, pupils and staff aware that staff can search an electronic device they have confiscated, as explained in Searching, Screening and Confiscation - GOV.UK

- ensuring appropriate filtering and monitoring systems are in place on the school's network and devices

Due to the constant changes to online technology and the related harms, we will carry out an annual review and risk assessment of our online safety policies, procedures and systems.

The 4Cs

Being online can be a great source of fun, entertainment, communication and education. Some people's online behaviour places others at risk. The number of issues covered under online safety is large and constantly growing. They are categorised into these four areas of risk:

Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

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. If pupils or members of staff report any issues, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

Mobile phones and smart technology **(including smart watches)**

Many children have unlimited and unrestricted access to the internet via mobile phone networks, therefore children could be harmed or harm others online when at school. This may include sexually harassing, bullying and sharing indecent images (often via large chat groups). To protect children from these risks while they are at our school, our approach to mobile and smart technology is that only year 6 children are allowed to bring 'brick' (non-smart or internet enabled) phones to school though they cannot be used on the premises and must be handed in on arrival to school. The wearing of smart watches is not permitted.

For our Early Years settings: Safeguarding children and protecting professionals in early years settings: online safety considerations - GOV.UK.

Media recordings, audio, image and video (including digital files)

When we make media recordings of pupils, such as taking videos or photos, we will get the child's and their parents'/carers' consent, make sure the pupil is appropriately dressed and encourage the child to tell us if they are worried about any media that has been taken of them. See our staff code of conduct and online safety policy, which cover our school's expectations for staff making media recordings.

Filtering and monitoring

To limit children's exposure to these categories of risk from Holy Trinity's IT systems, we have strong and effective filtering and monitoring systems, following the government's Meeting digital and technology standards in schools and colleges guidance. We will make sure that

- specific staff have assigned roles and responsibilities to manage systems
- staff know about the systems in place and how to escalate concerns
- there are annual reviews of the systems, or more frequently if there is a significant change or issue
- our governing body review the systems with the DSL, IT staff and service providers, to find out what more can be done to keep children safe
- the systems are effective for the age range of children and consider children potentially at greater risk of harm
- when we block online content, it does not impact on teaching and learning
- filtering works across all devices including mobile phones and smart technology

Generative Artificial Intelligence

Generative artificial intelligence (Gen AI) refers to technology that can be used to create new content (e.g. text, code and images) based on the data the models have been trained on. Our school is aware of the potential benefits of using Gen AI, such as for reducing staff's workload and freeing up teachers' time. At the same time, our school is aware of the risks and dangers associated with using Gen AI. We will use the Department for Education's advice and guidance on using Gen AI in education to ensure we integrate Gen AI tools safely and with children's best interests at the centre. Safeguarding concerns that arise through an individual's use of artificial intelligence will be responded to in line with our safeguarding policies. Our school's approach to using Gen AI is detailed in our online safety policy that can be found on the school's website, and our AI policy.

Remote education

When our children are being taught remotely e.g. at home, we will be in regular contact with parents and carers. We will make sure parents and carers are aware of

- what their child/ren are being asked to do online, including the sites they will be accessing and who from the school will interact with their child/ren

- the importance of children being safe online and offer advice on how to do so
- what systems our school uses to filter and monitor online use

Information security and access systems

We have procedures in place to protect our IT systems, staff and learners from cybercrime, i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly. We will follow the government's Cyber security standards guidance. Our procedures and systems are reviewed regularly to keep up with the constant changes to cyber-crime technologies.

12. Children potentially at greater risk of harm

At Holy Trinity we know that all children need to be protected from harm. In addition, we recognise that some groups of children are potentially at greater risk of harm. The information below highlights some of those groups of children this applies to; however there are several other groups not listed.

Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Children may need help due to abuse and/or neglect and/or complex family circumstances. Holy Trinity recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm, as well as disadvantage them educationally.

Children's services share with us which pupils have a social worker. Once we are aware of this information, we will use it to make decisions in the child's best interest, i.e. their safety, welfare and educational outcomes. When a child has a social worker, safeguarding is at the heart of every decision we make, such as how we react to unauthorised absence or children missing education, which themselves carry additional risks. When necessary, we offer extra in-school support to our pupils who have a social worker.

The Virtual School is a statutory service that exists to provide advice and support for children who have a social worker, children placed in care and previously looked after, such that they have the opportunity to meet their full educational potential. Where needed, our school works with the Virtual School to support these children.

Children looked after and previously looked after

These children are particularly vulnerable. The most common reasons for children becoming looked after is as a result of abuse and/or neglect. Holy Trinity will ensure that staff have the necessary skills and knowledge to keep children looked after, and previously looked after, safe. All staff will have the skills and knowledge to keep these children safe. Appropriate staff will have the

information they need in relation to a looked-after child's legal status. For example, who has parental responsibility, who is not permitted to have contact and who is not permitted to know where the child is being educated, and the level of decision-making power the local authority has given the carer. The designated teacher for children looked after is Lucy Ashby. The designated governor for children looked after is Francis Neal.

The statutory guidance Designated teacher for looked-after and previously looked after children contains further information on the role and responsibilities of the designated teacher. The designated teacher ensures that the school has the up-to-date details of the allocated social worker and the Virtual School headteacher in the local authority that looks after the child. The Virtual School has an additional role of managing extra funding which is used to support children looked after. The designated teacher will work with the Virtual School Head to discuss how the funding can be used to best support the child.

We are aware that some children are looked after by individuals other than their parents. The charity Kinship describes kinship carers as 'family or friends who step up, often during an unexpected crisis, to care for a child when their parents aren't able to'. We will seek and follow the advice from the Virtual School on how to best support children and their families who are under formal or informal kinship arrangements.

Children with special educational needs, disabilities and health issues

Our Special Educational Needs Co-ordinator and DSL work closely together to safeguard and support pupils who have special educational needs and disabilities (SEND), in particular when there are any reports of abuse. Our safeguarding curriculum, i.e. the ways we teach pupils to keep themselves and others safe, is adapted to meet the needs of pupils with SEND.

Holy Trinity is aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, such as

- 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, and the communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges, or the consequences of doing so.

Children who are lesbian, gay, bisexual, trangender or gender questioning

We recognise that children may be targeted by other children if they are, or are perceived to be, part of the LGBT+ community. Our school strives to create and maintain a culture of inclusivity and a sense of belonging for all children. We aim to create a safe and open space where children feel comfortable speaking out and sharing their concerns. Any discrimination we become aware of is firmly addressed in line with this policy and the behaviour policy. The school will also educate the child who has discriminated, providing them with the support they need to reduce the risk of this behaviour happening again.
When children are questioning their gender, we will provide in-school support and engage external agencies for additional advice, always considering the child's individual needs. Unless it is unsafe to do so, we will work together with the child's parents and carers to ensure decisions are made with the child's input where possible, and always in their best interest.

13. Identified areas of particular risk for our school

Areas of risk specific to Holy Trinity CE Primary School & Nursery and the local area include:

- site situated near a busy road and near a level crossing
- high number of families with English as an additional language
- Children with SEND
- accessing sports off-site
- building works in term time
- Proximity of River Thames

14. Lettings and off-site arrangements

The school has a lettings agreement policy, which can be found on the server or in the school office. When services or activities are provided by the governing body under the direct supervision or management of our school staff, the safeguarding procedures listed in this policy will apply. This may not be the case when we hire or rent out our school to other organisations or individuals, such as community groups, sport associations and extra-curricular activities providers. We will make sure there are arrangements in place to keep children safe, regardless of whether they are pupils at our school.

To make sure the provider has the appropriate safeguarding arrangements in place, we will follow the government's Keeping children safe during community activities, after-school clubs and tuition non-statutory guidance. This includes checking that they complete the essential pre-employment checks on their staff and that their staff are suitable to be around children. Where appropriate, we will seek assurance and check their safeguarding policies and procedures, as well as establish what the arrangements are for the provider to liaise with our school on safeguarding matters. We will

terminate our agreement with the provider if they do not follow the safeguarding requirements listed in the agreement.

Extended school and off-site arrangements

Where extended school activities are provided by and managed by the school, our own safeguarding and child protection policy and procedures apply. When our pupils attend off-site activities, we will ensure that effective child protection arrangements, informed by thorough risk assessments, are in place.

When our children attend an alternative provision provider, we continue to be responsible for their safety and wellbeing. We will satisfy ourselves that the placement can meet the child's needs and obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform on our own staff. We follow the statutory guidance for alternative provision and Achieving for Children's alternative provision policy. The written agreement between the school and the provider will be clear that the provider must inform us of any arrangements that may put the child at risk, and where the child is at all times during school hours (including addresses). We will regularly review the placement to satisfy ourselves that it can meet the child's needs. We will carry out an immediate review of the placement where safeguarding concerns arise and reserve the right to terminate the arrangement if concerns are not adequately addressed.

Where a parent/carer expresses their intention to educate their child at home (also known as elected home education), we will work together with the parent/carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant for children who have SEND, are vulnerable and/or have a social worker.

15. Training

Designated safeguarding lead

The designated safeguarding lead will attend regular training to prepare and assist them in leading the school's safeguarding response and approach. Additional training or research may be required as local or school specific safeguarding issues arise. Minimally, the designated safeguarding lead and deputies will

- attend the level 3 multi-agency local safeguarding children partnership training within 12 weeks of starting this role and refresh this every two years
- stay up to date with safeguarding knowledge, resources and changes
- have a good understanding of, and form a good relationship with, the Kingston and Richmond safeguarding children partnership by attending the termly DSL forums, sharing

the learning with staff as appropriate and making sure staff are aware of any safeguarding training on offer
- attend Prevent awareness and safer recruitment training, and ensure they have a good understanding of harmful sexual behaviour
- attend harmful sexual behaviour and Prevent awareness training
- receive and share safeguarding (including online safety) updates (for example, via email, e-bulletins, and staff meetings) with staff
- ensure safeguarding training attended by the DSL and provided for staff covers the criteria set out in the EYFS statutory guidance under Annex C
- make sure staff have regularly updated safeguarding training, updating staff who miss training at the earliest opportunity
- gain an understanding of how the school's filtering and monitoring systems work and how they can be best used to keep children safe at Holy Trinity

Governors

All governors receive safeguarding and child protection training (including online safety) at induction, which prepares them for testing and challenging the school's procedures and policies, making sure they are working as they should. The training will be regularly updated. Further,

- The governing body will make sure the designated safeguarding lead has the time and resources to attend training.
- The chair of governors will receive training about managing allegations against the headteacher to assist them in the eventuality that an allegation is made.
- The governing body will make sure that online safety is a theme in all staff training.
- Senior members of the board will make sure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
- The link safeguarding governor will make sure that staff and governors attend safeguarding training at induction and regularly after that. The link safeguarding governor will attend regular training and receive e-bulletins or equivalent to stay up to date with the latest statutory guidance.

The governing body will make sure at least one member of every recruitment panel has completed safer recruitment training within the last five years. Holy Trinity has a separate safer recruitment policy, which explains what safeguarding checks are completed before employment to make sure those who work with children are suitable.

All staff

Governors recognise the expertise that staff build up by managing safeguarding concerns on a daily basis and, as a result, have the opportunity to contribute to and shape staff training and this policy. All staff receive core safeguarding and child protection training (including online safety) at

induction that is minimally renewed every two years or sooner if required. The training is regularly updated and reflects the whole school approach to keeping children safe. In addition, staff receive regular, at least annual, safeguarding updates (for example, via email, e-bulletins and staff meetings) to provide them with what they need to keep children safe.

The EYFS requires settings' safeguarding policies to include details of how safeguarding training is delivered and how practitioners are supported to put this into practice. Add a paragraph here or incorporate into the paragraph above. The 'how' might include a mixture of training provided by the DSL, online or from external visitors, and can include the way regular safeguarding updates are delivered to staff. Provide information about how the school tests the effectiveness of training to ensure staff understand their role and feel supported to put training into practice. This may include staff quizzes, surveys that require staff to self-assess their confidence levels in identifying abuse, and/or finding educational opportunities to remind staff about school procedures.

Our training ensures that staff

- can spot the signs of possible abuse, neglect and exploitation
- know the school's safeguarding policies and procedures and feel supported and confident to carry them out within their role
- have awareness of and understand their role in the early help process and the process for making a referral to the local authority's children's services, including what may follow after a referral
- know what to do if a child tells them they are being harmed, including how to manage this information confidentially
- understand the reasons why children may not feel ready or know how to tell someone that they are being harmed
- receive Prevent training, which will prepare them for identifying children at risk of being radicalised into terrorism and how to challenge extremist ideas
- understand what cyber security the school has in place to keep pupils and staff safe when online at school and how to report any issues
- understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues
- know that children who identify as or are perceived be LGBT can be targeted by other children
- those responsible for children in early years have received paediatric first aid training to be counted within staff-children ratios

We make sure that staff members provided by other agencies and third parties, for example supply teachers and contracted staff (such as catering staff) are aware of this policy, our school's safeguarding procedures, and have received appropriate safeguarding training.

The headteacher will receive training about managing allegations against staff to assist them in the eventuality that an allegation is made.

The designated teacher for children who are looked after (CLA)

We follow the Role and responsibilities of the designated teacher's statutory government guidance. The designated teacher will have training to make sure they understand the needs of children looked after/previously looked after and how they can best be supported to have the same opportunities as their peers. They will work closely with AfC's Virtual School, accessing their training and forums to stay up to date.

16. Teaching and Learning

At Holy Trinity we aim to prevent our pupils from coming to any harm. We recognise how important it is that we teach and role-model to pupils how to keep themselves and others safe.

Holy Trinity CE Primary School & Nursery has a clear set of values and standards. Our Christian Values are explicitly taught through Collective Worship and are reinforced in the classroom and around school and upheld and demonstrated throughout all aspects of school life.

'Love learning, love one another, love God'.		
Aspiration	**Love**	**Community**
We will show this value through:	*We will show this value through:*	*We will show this value through:*
Resilience	Compassion	Inclusivity
Creativity	Truth	Friendship
Perseverance	Kindness	Respect
Courage	Forgiveness	Responsibility

Safeguarding is included in all areas of teaching and learning through PSHE, SMSC, RSE, computing and assemblies. We have used external agencies such as the NSPCC, Holly Lodge and AfC to deliver safeguarding sessions, workshops, etc. Areas covered include:

- personal safety
- who to talk to
- stranger danger
- lockdown
- fire safety
- road safety
- online safety

- bullying (including online bullying)
- positive relationships
- Child Exploitation
- self-esteem
- drugs and alcohol

The PSHE and RSE curriculum covers the following issues according to the age and stage of development of the pupils:

- healthy and respectful relationships
- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- prejudiced behaviour
- that sexual violence and sexual harassment is always wrong

If specific safeguarding issues arise during the school year, the headteacher will make sure the curriculum is adapted to cover current issues.

17. Linked policies

This policy is one of a range of documents that set out what our responsibilities are and how we should carry them out. Other relevant documents include the below policies:

- Behaviour and Anti-bullying
- Safer recruitment
- Staff code of conduct
- Whistleblowing
- Procedure for managing allegations against staff (including low-level concerns)
- Health & safety
- Attendance
- RSE
- Supporting pupils with medical needs
- Online safety
- Risk assessments
- Intimate care

Appendix 1: Types of abuse and specific safeguarding concerns

These appendices are based on the Department for Education's KCSiE guidance.

Abuse is where somebody fails to prevent harm (neglect) or causes harm (abuse). It can take place anywhere, including online and outside of the home. Harm can include witnessing ill treatment of others, for example seeing, hearing, or experiencing the effects of domestic abuse. We are aware that safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Our staff will be aware that technology is a significant part of many safeguarding issues.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve

- communicating to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- seeing or hearing the ill-treatment of another, such as in situations of domestic abuse
- serious bullying (including online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the 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
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

We use the following guidance to help identify and address cases of neglect.
Handling Cases of Affluent Neglect in Schools
Local partnership guidance , including the child neglect toolkit

Indicators of abuse

The following list, provided by the NSPCC, covers some common indicators of abuse and neglect.

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body
- patterns of repeated lateness or absence

It is important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk.

Specific safeguarding concerns

This section is based on Annex B of KCSIE. Annex B includes further information about other safeguarding issues to be aware of. **All concerns under this section should be addressed in line with the section 6 of this document, unless stated otherwise.**

Children absent from education

All staff will be aware that children missing from education or absent persistently, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Further, it may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. We are also aware that absence can increase any existing safeguarding risks.

Attendance is closely monitored at Holy Trinity to support us in identifying abuse and acting early. Our staff will be aware of our school's or college's unauthorised absence procedures and children missing education procedures. We notify children's services if a child who has a social worker is absent from school without a suitable explanation. We make sure we have more than one emergency contact number for each pupil, which supports the school's procedure for addressing children missing and absent from education. We work in partnership with Achieving for Children when patterns of absence give rise to concern, including notifying them when a pupil leaves our school without a new school being named.

In line with the EYFS, attendance will also be monitored for children attending our setting who are not of statutory school age. We will follow the school's safeguarding procedures if we have any concerns about prolonged absences or if a child is absent without notification from the child's parent or carer despite the school making attempts to contact them. This may include a referral to children's services and/or requesting a police welfare check.

Our attendance policy and procedures are set out in a separate document. The school follows the government's Working together to improve school attendance guidance.

Useful links:
Local partnership guidance
Children Missing Education statutory government guidance

Contextual safeguarding

Contextual safeguarding, also known as 'risk outside the home', is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Holy Trinity will maintain records of concerns about contextual safeguarding in accordance with our safeguarding procedures. We know the importance of information sharing, therefore if we

identify contextual safeguarding concerns about the local area we will share this information with the contextual safeguarding team for Achieving for Children, contextualsafeguarding.exploitation@achievingforchildren.org.uk. If there is a specific concern about a child, we will consult with the relevant children's services.

Useful links:
Local partnership guidance
Achieving for Children's Risk Outside the Home page
Tackling Child Exploitation multi-agency Practice Principles

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Both can occur online. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Our staff will be aware of a range of factors that could make a child more vulnerable to exploitation. We will provide additional support to children who have been exploited to help keep them in education.

Some of the following can be indicators of both child criminal and sexual exploitation where children

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Child sexual exploitation (CSE)

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

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example believing they are in a genuine romantic relationship.

CSE can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who

- have older boyfriends or girlfriends
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant

Holy Trinity follows the London Child Protection Procedures regarding sexual exploitation. Further information on signs of a child's involvement in sexual exploitation is available on The Children's Society's website and Home Office's Child sexual exploitation: definition and guide for practitioners.

See the Sharing nudes and semi-nudes section below for details about 'sextortion'.

Child criminal exploitation (CCE)

At Holy Trinity, we recognise children involved in CCE are victims, despite their engagement in crime. A child may still have been criminally exploited even if the activity appears to be consensual. Staff will be aware that girls are at risk of criminal exploitation too, and that both boys and girls who are being criminally exploited may be at higher risk of sexual exploitation.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

CCE can include children being forced and/or manipulated

- to work in cannabis factories
- into moving drugs or money across the country (county lines)
- to shoplift or pickpocket
- to threaten serious violence to others
- into committing vehicle crime

Serious violence

Staff at Holy Trinity will be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime.

These may include

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

All staff are aware of the range of risk factors increasing the likelihood of involvement in serious violence, such as

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery

Being the victim of, carrying out or allegedly carrying out serious violence (e.g. knife crime) may indicate that a child is involved in county lines.

Useful links:
Preventing youth violence and gang involvement government guidance
Criminal exploitation of children and vulnerable adults: county lines government guidance
London Child Protection Procedures on gang activity and serious youth violence

School-related weapons incidents

Holy Trinity follows the AfC School Related Weapons or Potential Weapons Incidents Protocol. We will inform children's services and the police of any incident involving a weapon or potential weapon. Our teachers have the legal power to search children without consent for a number of 'prohibited items', including weapons covered in the government's Searching, screening and confiscation guidance.

Holy Trinity recognises that children and young people involved in school-related weapons incidents, including the person displaying the behaviour, are vulnerable. Holy Trinity will provide support, protection and education to develop a full understanding of the implications of carrying, and/or using, weapons.

Children who run away or go missing from **education**, home or care

Holy Trinity recognises that children who run away, go missing or are absent from their normal residence or education are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm. The statutory guidance Children Who Run Away or go Missing from Home or Care requires that every child or young person who runs away or goes missing must be offered a return home interview (RHI) within 72 hours of their return.

When necessary and in conjunction with Achieving for Children or other relevant local authority, Holy Trinity will facilitate RHIs, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on the school or college site for the interview to take place. We will follow the Kingston and Richmond Safeguarding Children Partnership's Missing children procedure when required.

Mental health

With mental health problems, a child might find the ways they are frequently thinking, feeling or reacting becoming difficult, or even impossible, to cope with. Mental health problems affect around 1 in 6 children. Holy Trinity recognises 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.

Staff will be trained to recognise the signs of a child who may be experiencing a mental health problem. Holy Trinity aims to promote positive mental health for all staff and pupils. To do so, we take into account the government's Mental health and behaviour in schools guidance.
Our mental health lead is: Lucy Ashby

Useful links:
Local partnership guidance
Mind
NSPCC: Child mental health

Drugs and alcohol

Through our RSHE curriculum, we provide age-appropriate education on the risks and effects of drug, alcohol, tobacco and vapes. The school prioritises the safety and wellbeing of children who use, or are at risk of using, drugs or alcohol by adopting a safeguarding-first approach. We understand that drug and alcohol use can be an indicator of underlying vulnerabilities or harm. Staff are trained to recognise the signs of drug and alcohol use and its potential links to other safeguarding concerns. We will work together with external agencies, such as children's services, health professionals and the police, to ensure children receive appropriate early help and interventions. Where there is concern that a pupil is under the influence or that drugs, alcohol,

tobacco or vapes are present on school premises, we will act in line with our first aid procedures, behaviour policy and, where applicable, the When to call the police guidance.

Useful information:
Local partnership guidance

Domestic abuse

Domestic abuse can include a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It can take place inside and outside the home. The Domestic Abuse Act 2021 states 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 (teenage relationship abuse).

These experiences can have a serious and long-term impact on a child's health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The Act states that domestic abuse occurs between at least two people over the age of 16. Therefore, legally, some older children can also commit domestic abuse either in their own intimate relationships or against their parents/carers.

Holy Trinity has signed up to the police initiative Operation Encompass, a system which ensures that when police are called to an incident of domestic abuse and a child/children in the household experienced the incident, the police will inform the DSL in school before the child or children arrive at school the following day. Once informed, the DSL or a deputy will provide silent support according to the child's needs and update records about their circumstances.

Useful link:
Local partnership guidance

Homelessness

Holy Trinity recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include: household debt, including new poverty induced by the pandemic; rent arrears; domestic abuse and antisocial behaviour; and/or the family being asked to leave a property. If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

Child-on-child abuse

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen inside and outside school and online. This can include, but is not limited to

- bullying (including online bullying, prejudice-based and discriminatory bullying)
- abuse between children in an intimate relationship
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including when a child encourages or threatens physical abuse online)
- sexual violence, such as rape and sexual assault (including when a child encourages or threatens this online)
- sexual harassment, such as sexual comments, jokes and online sexual harrassment
- consensual and non-consensual sharing of nude and semi-nude images and/or videos
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting and initiation/hazing type violence and rituals

Older pupils may use any of these types of child-on-child abuse to 'recruit' younger pupils into gangs, especially in areas where gangs are prevalent. Young people experiencing child sexual exploitation first hand may be forced to recruit other young people using types of child-on-child abuse. We are aware that boys are more likely to carry out child-on-child abuse and girls are more likely to impacted by it, but all child-on-child abuse is unacceptable and will be taken seriously.

Holy Trinity does not tolerate child-on-child abuse. We know that even when there are no reported cases of child-on-child abuse, it could still be happening but yet to be reported. We do not downplay child-on-child abuse, especially sexual violence and sexual harassment, as "banter", "just having a laugh", "part of growing up" or "boys being boys". For pupils to feel safe at our school, we make sure they know child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

It is our duty to minimise the risk of child-on-child abuse. We do this in the following ways:

- Our staff read this policy.
- Our staff are trained to spot the signs that a child is, or may be experiencing, child-on-child abuse and how to report it. They maintain an attitude that 'it could happen here'.
- Our staff challenge any inappropriate behaviour between children, including the use of derogatory language.
- The behaviour policy, which includes our whole school response to abuse, makes sure everyone knows how to behave and how to respond consistently when pupils show unacceptable or abusive behaviour.
- In all areas of school life, such as lessons, assemblies and in the playground, we teach pupils how to act and to treat other people, including when they are online.
- We have effective systems in place for pupils to report child-on-child incidents.

Child-on-child sexual violence and sexual harassment

Our school is aware of Ofsted's Review of sexual abuse in schools and colleges. The review was carried out as a result of the large amount of testimonies shared on the Everyone's Invited website, which highlighted the prevalence of sexual harassment and sexual violence.

We know that sexual violence and sexual harassment can happen between two children of any age or sex, from a group of children to a single child or group of children, online and face to face. It is more likely that girls will be impacted by sexual violence and more likely that sexual harassment will be instigated by boys. Sexual violence and sexual harassment exists on a continuum and may overlap. They are never acceptable and we will not tolerate them. National and local research has made us aware of the prevalence and normalisation of harassment and abuse in school-aged children. No reports does not mean it is not happening here at Holy Trinity.

Alongside girls, these groups are at higher risk of sexual violence and sexual harassment:

- children with SEND
- pupils who are LGBT or who are perceived to be LGBT by their peers

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, negatively affect their educational attainment and be worsened if the alleged perpetrator(s) attends the same school. If a child reports an incident, they will be reassured that they have done the right thing by telling a trusted adult, will be taken seriously, supported and kept safe. We will further reassure those affected that the law is there to protect them, not criminalise them.

We are aware that when a child reports sexual violence or harassment, this may only be the start of a larger disclosure that could transpire over time. When there are reports, we will always consider the effectiveness of our policies and procedures and whether any changes are necessary to reduce the risk of it happening again. This will be in line with the school maintaining a culture of safeguarding.

Holy Trinity follows Part 5 of KCSiE when considering our response to sexual violence and sexual harassment. These are mainly captured in the child-on-child abuse section of this policy.

Harmful sexual behaviours (HSB)

Children's sexual behaviours exist on a continuum. HSB refers to problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. HSB can occur online or face-to-face. We will always consider HSB in a child protection context. Holy Trinity recognises that pupils displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

When considering HSB, we will take into account the ages and the stages of development of the children. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Our DSL and deputies will

- have a good understanding of HSB
- assist in planning the curriculum aimed at preventing HSB
- ensure staff spot and report inappropriate behaviour to prevent an escalation
- incorporate our approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding

Holy Trinity's curriculum addresses these issues via the following topics according to the age and stage of development of our pupils:

- healthy and respectful relationships
- what respectful behaviour looks like
- stereotyping, equality
- body confidence and self-esteem
- consent

Useful links:
Local partnership guidance
Centre of Expertise on child sexual abuse: Resources for education settings
NSPCC Harmful Sexual Behaviours
Stop it Now

Upskirting

Holy Trinity will ensure that all staff and pupils are aware that 'upskirting' is a criminal offence and will not be tolerated. The Criminal Prosecution Service (CPS) defines 'upskirting' as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission".

Holy Trinity will decide each incident on a case-by-case basis, with the DSL or a deputy taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police, as required.

Sharing nudes and semi-nudes

This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18 (UKCIS, 2024). Alternative terms used by children and young people may include 'dick pics' or 'pics'. It is a form of child sexual abuse. All incidents will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the children involved. while sharing nudes and semi-nudes of them or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily.

Children might share nudes because of threats and/or pressures from relationships. They might also want to send nudes, but this is usually because they believe they will get something in return. Sextortion is when someone threatens to share or distribute nude or semi-nude images of another person if they don't do what is asked. It can happen to anybody, but a large amount of cases involve teenage boys. The explicit imagery may be used to blackmail the young person into sending more images, money, or in some cases, into recruiting more victims. Images can be both real or generated by artificial intelligence.

We are aware of and in response to incidents will use the alert guidance and support provided by the National Crime Agency and CEOP.

So-called 'honour'-based abuse, including FGM and forced marriage

So-called 'honour'-based abuse (HBA) means incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. We are aware this abuse often involves a wider network of family or community pressure and can include multiple perpetrators. Therefore, we will consult with children's services before taking any form of action to reduce the dynamic and additional risk factors that might be present as a result.

Female genital mutilation (FGM)

Female genital mutilation (FGM) means all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. The DSL will make sure that staff have appropriate training to prepare them for spotting signs that a child has been affected by FGM or is at risk of FGM.

Section 6 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Signs that FGM might happen:

- A relative or someone known as a 'cutter' visiting from abroad.

- A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'.
- A female relative, like a mother, sister or aunt has undergone FGM.
- A family arranges a long holiday overseas or visits a family abroad during the summer holidays.
- A girl has an unexpected or long absence from school.
- A girl struggles to keep up in school.
- A girl runs away – or plans to run away - from home (NSPCC)

Signs FGM might have taken place:

- having difficulty walking, standing or sitting
- spending longer in the bathroom or toilet
- appearing quiet, anxious or depressed
- acting differently after an absence from school or college
- reluctance to go to the doctors or have routine medical examinations
- asking for help – though they might not be explicit about the problem because they're scared or embarrassed (NSPCC)

Useful information:
Female Genital Mutilation Statutory Guidance
Local partnership guidance
National FGM Centre

Forced marriage

A forced marriage is non-consensual. Either person could be forced/pressured in several ways, including physically, psychologically, financially, sexually and emotionally. It is a criminal offence in England and Wales.

An arranged marriage is different. The families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement remains with those who are considered for marriage.

We are aware that the legal age for marriage in the UK has risen to 18, regardless of parental consent. The DSL will follow the local safeguarding procedure and, if necessary, seek advice from the Forced Marriage Unit on 020 7008 0151 if a concern comes to their attention.

Useful information:
Freedom charity
Handling cases of forced marriage guidance
National FGM Centre

Modern slavery

Modern slavery is a crime whereby a person uses another person, by means of deception or coercion, as a possession for the purposes of exploitation. We are aware modern slavery exists in the UK and that some victims are children.

Common places modern slavery occurs includes

- the sex industry, including brothels
- retail: nail bars, hand car washes
- factories: food packing
- hospitality: fast-food outlets
- agriculture: fruit picking
- domestic labour: cooking, cleaning and childminding

Victims can be forced into criminal activities such as cannabis production, theft or begging.

The DSL will seek advice and support from children's services who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM). Further advice can be provided directly by the modern slavery helpline on 0800 012 1700.

Useful information:
Modern slavery: how to identify and support victims

Private fostering

A private fostering arrangement is when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16, or under 18 if the child is disabled.

Holy Trinity is aware that, by law, a parent or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. We have a duty to inform children's services of this arrangement if they have not been notified, but we will encourage parents and private foster carers to do so in the first instance.

Useful links:
Looking after someone else's child
Local partnership guidance

Preventing radicalisation and extremism

While some children are more susceptible, any child can be radicalised into terrorism. We take our statutory duty to prevent children from becoming terrorists or supporting terrorism seriously.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. It can occur over a period of time or quickly.

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This includes calling for the death of members of the armed forces.

Terrorism is an action that:

- endangers or causes serious violence to a person/people
- causes serious damage to property, or
- seriously interferes or disrupts an electronic system.

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

To prevent children from being radicalised into terrorism, we make sure that:

- Our filtering and monitoring systems will prevent and protect children from accessing extremist material.
- Pupils are taught about British Values and staying safe online via the curriculum.
- Children are provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views.
- Staff are trained to spot the indicators of radicalisation and extremism and how to report concerns as soon as possible.
- The DSL attends Prevent awareness training and is aware of the latest guidance.
- We perform a risk assessment which assesses how our learners or staff may be at risk of being radicalised into terrorism (including online) using the counter terrorism local profile and updates from the local partnership.

The Educate against hate government website lists signs that could indicate that a child is being radicalised:

- becoming increasingly argumentative
- refusing to listen to different points of view
- unwilling to engage with children who are different
- becoming abusive to children who are different
- embracing conspiracy theories
- feeling persecuted
- changing friends and appearance
- distancing themselves from old friends
- no longer doing things they used to enjoy
- converting to a new religion
- being secretive and reluctant to discuss their whereabouts
- changing online identity
- having more than one online identity

- spending a lot of time online or on the phone
- accessing extremist online content
- joining or trying to join an extremist organisation

If you have concerns that a pupil may be at risk of radicalisation or involvement in terrorism, go to section 6.

Useful links:
Local partnership guidance
Protecting children from radicalisation: the prevent duty

Child abuse linked to faith or belief

This type of abuse can happen anywhere across any community and/or religion. There are a variety of definitions associated with abuse linked to faith or belief. It can include, but is not limited to, the concept of belief in

- witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs)
- the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context)
- ritual or multi-murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation

If you suspect a case of child abuse linked to faith or belief, follow the safeguarding procedures in this policy. In addition, the Metropolitan Police's Project Violet team can be contacted on the non emergency, 24/7 number: 101.

Useful links:
Metropolitan Police advice
Short Youtube introduction video
National FGM Centre

Fabricated or induced illnesses

Staff at Holy Trinity are alert to the issues surrounding fabricated or induced illnesses.
Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. Our supporting pupils with medical needs policy details our procedure for ensuring reported medical needs are evidenced by medical professionals.

Useful link:

The Royal College of Paediatrics and Child Health (RCPCH) guidance