

# SAFEGUARDING AND CHILD PROTECTION POLICY

<b>Approving Body</b>	Trust
<b>Date of Last Review</b>	December 2025
<b>Statutory (Y/N)</b>	Y
<b>Responsible Officer</b>	BMAT CEO for and on behalf of the Trust



### The Forest Academy - Key Safeguarding Staff

Chief Executive Officer	Kathryn Burns
Principal	Cristalina Fernandes-Bates (interim)
Designated Trustee/Governor for Safeguarding and Child Protection	Miz Mann (Trustee) Julie Stewart (Chair of Governors)
Designated Safeguarding and Child Protection Leads	Cristalina Fernandes-Bates – Interim Designated Safeguarding Lead (DSL) Mariam Mayet – Deputy Designated Safeguarding Lead (DDSL) Tara English – Deputy Designated Safeguarding Lead (DDSL) – Assistant Principal (Years 10 and 11) Kanu Onienze – Deputy Designated Safeguarding Lead (DDSL) – Assistant Principal (Years 7, 8 and 9) Will Luck – Deputy Designated Safeguarding Lead (DDSL) – Assistant Principal (Sixth Form)
Whole School Mental Health Leads	Kanu Onienze – Assistant Principal Mariam Mayet - DDSL
SENDCo	Salma Miah
Wellbeing Team	Jaeden Dixon – SEND DHOY Maria Sakaliene – SEND DHOY Leasa Fernandez – Parent Support Advisor

### Beal 6<sup>th</sup> form (BSF):

Chief Executive Officer/Executive Principal BHS	Kathryn Burns
Co-Headteacher/DSL	Yvonne Andress
Co-Headteacher	Will Mackintosh
Principal and DSL at The Forest Academy	Cristalina Fernandes-Bates (Interim)
Deputy Designated Safeguarding and Child Protection Lead (DDSL)	Jo Hooker
Vice Principal – Head of BSF (Beal High School Campus)	Scott Baker (Vice Principal at BHS)
Assistant Principal/DDSL – Director of 6 <sup>th</sup> form (The Forest Academy Campus)	Will Luck (Assistant Principal)
SENDCo (TFA campus)	Salma Miah
Wellbeing Team (The Forest Academy site)	Jenni Cook (Student Services Manager)

## **I. INTRODUCTION – PURPOSE AND SCOPE**

- 1.** BMAT is committed to safeguarding and promoting the welfare of children and young people ('Children' includes everyone under the age of 18). We place high expectations on all staff and volunteers to share in this commitment. BMAT are dedicated to ensuring that children and young people are valued, respected, listened to and taken seriously especially with regard to their safety and wellbeing. The Trust's overriding concern is the best interests of every child and young person in its care. In meeting this concern, this policy aims to:
  - a.** Provide staff with a framework to promote and safeguard the wellbeing of children and ensure that they comply with their statutory responsibilities.
  - b.** Ensure consistent good practice across BMAT.
  - c.** Provide a caring, positive, safe and stimulating environment that promotes social, mental, physical and moral development.
  - d.** Identify concerns early and prevent them from escalating.
  - e.** Ensure that children who have unmet needs are supported appropriately.
  - f.** Raise student awareness of child protection issues and equipping students with the skills they need to remain safe.

- 2.** 'Safeguarding' means the arrangements that are in place for all children. It means:

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

- 3.** 'Child Protection' means the policy and procedures for children who have been harmed or likely are at risk of harm.

## **II. LEGISLATION AND STATUTORY GUIDANCE**

- 4.** This policy is read alongside and based on the following legislation:
  - a.** The Department for Education's statutory guidance [Keeping Children Safe in Education \(2025\)](#)
  - b.** [Working Together to Safeguard Children \(2023\)](#).
  - c.** [Sexual Violence and Sexual Harassment between children in schools and colleges \(September 2021\)](#)
- 5.** We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners. Beal High School adheres to the Local Redbridge Safeguarding Children

Partnership procedures (RSCP). The full procedures and additional guidance relating to specific safeguarding issues and local risks can be found on the RSCP website:

<https://www.redbridgescp.org.uk/>

6. This policy, and all action relating to it, is also in line with the following legislation and guidance.
  - a. The Children Acts of 1989 and 2004
  - b. The Education Acts of 2002 and 2011
  - c. Education and Training (Welfare of Children) Act 2021
  - d. [Working together to improve school attendance \(2024\)](#)
  - e. The Education (Pupil Information) Regulations (England) 2005 and (Amendment) Regulations 2018
  - f. The School Staffing (England) Regulations 2009 and School Staffing (amendment) 2015
  - g. The Children and Families Act 2014
  - h. The Safeguarding Vulnerable Groups Act 2006
  - i. The Counter-Terrorism and Security Act 2015 (PREVENT Duty)
  - j. PREVENT Duty Guidance 2023
  - k. Searching, Screening and Confiscation 2018
  - l. Supporting Mental Health in Schools and Colleges 2018
  - m. The Female Genital Mutilation Act 2003.
  - n. Childcare Act (2006)
  - o. Human Right Act 1998
  - p. The Equality Act 2010
  - q. Relationships and Sex Education (RSE) and Health Education [guidance](#) for introduction 1 September 2026

### **III. GUIDING PRINCIPLES**

7. **Safeguarding and child protection is the responsibility of everyone:** Staff, students, parents/carers, volunteers and visitors should be aware of and in compliance with this policy at all times. Everybody working in the school must read at least [Part one of The Department for Education statutory guidance – Keeping Children Safe in Education](#) and complete the BMAT questionnaire so that they understand their safeguarding responsibilities.
8. **ALL** staff have a responsibility to identify concerns early, provide help, promote children's welfare and prevent concerns from escalating.
9. **Equality Statement:** Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. BMAT is committed to anti-discriminatory practice and recognise children's diverse circumstances. We give special consideration to all children and will equip all staff to identify children who may benefit from early help such as:

- a. Have special educational needs or disabilities;
- b. That are young carers;
- c. Is frequently missing/goes missing from education, home or care
- d. Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- e. That may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- f. Have English as an additional language;
- g. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;
- h. Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation, modern slavery, showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups/county lines;
- i. Are asylum seekers.
- j. Are at risk due to either their own or a family member's mental health needs
- k. Are looked after or previously looked after (see section IV)
- l. Have experienced any form of abuse
- m. Are missing or absent from education for prolonged periods and/or repeated occasions
- n. Whose parent/carer has expressed an intention to remove them from school to be home educated.

**10. E-Safety:** BMAT has an '[E-Safety Policy](#)' and a "[Student Mobile Device Policy](#)" to ensure its ability to protect and educate students and staff in their use of technology such as mobile phones and cameras. It is recognised that the use of technology has become a significant component of many safeguarding issues, such as Child Sexual Exploitation, Radicalisation, Sexual Predation. As schools work increasingly online, it is essential that children are safeguarded from potentially harmful and inappropriate online material.

- a. BMAT will follow the Data Protection Act 2018 when taking and storing photos and recordings for use in one of its constituent schools.
- b. Staff will receive annual e-safety training and updates throughout the year, via staff bulletins and briefings.
- c. Students will participate in e-safety awareness sessions via tutor time, ICT lessons and PSHE/RSE lessons.
- d. The school will use the following resources to ensure their pupils understand how to stay safe and behave online:
  - DFE advice for schools – [Teaching Online Safety in School](#) (June 2019)
  - UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#)
  - [Childnet](#): Guidance for schools on cyberbullying

- National Crime Agency's CEOP education programme: [Thinkuknow](#)
- Public Health England: [Rise Above](#)
- UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#)
- UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

11. **Using Reasonable Force.** It is sometimes necessary and proportionate for BMAT staff to use reasonable force to protect and safeguard BMAT students. Our policy on using reasonable force is set out in the [BMAT Student Behaviour Policy](#), and is compliant with legislative requirements.
12. **Radicalisation/PREVENT:** The [Counter Terrorism and Security Act 2015](#) as well as [PREVENT Duty Guidance 2023](#) places the PREVENT duty on schools to have due regard to the need to prevent people from being drawn into radicalism and/or terrorism.
  - a. BMAT upholds this duty in its curriculum. Any staff should report concerns if they are aware of a pupil exhibiting extremist ideology.
13. **Lettings** are vetted and monitored by the Trust Executive and relevant risk assessments will be undertaken.
  - a. All staff have a statutory duty to look out for and inform the Safeguarding Team of any concerns.

**14. Training and Support:**

- a. All staff will receive safeguarding and child protection updates as and when required and training, including online safety at least annually and as part of their induction.
- b. School principals/Co-headteachers will ensure that the designated persons for safeguarding and child protection undertake the necessary formal training at least annually and that this is updated at regular intervals.
- c. The Designated Lead(s) will ensure that all members of the Safeguarding Team have higher level training; and that the training of all members of staff is updated 'regularly' and at least annually.
- d. All members of staff are required to read Part One of ['Keeping Children Safe in Education'](#).
- e. The Designated Lead (or a member of the Safeguarding Team) will offer child protection awareness training, including online safety as part of the induction package for all staff and trainees.

**15. Confidentiality:**

- a. The purpose of confidentiality is to benefit the student: no one should guarantee confidentiality to a student, as any child protection concern **must** be reported to the Safeguarding Team and shared with relevant agencies.
- b. Staff will be informed of individual child protection issues confidentially and on a 'need to know' basis only.

**16. Records and Monitoring:**

- a. Anyone receiving a disclosure of abuse, neglect and exploitation or noticing signs of possible abuse **must** make a signed and dated record within **24 hours** of reporting the

incident; noting what was seen or said, putting the event into context, and giving the date, time and location. Incidents should be reported to the Designated Safeguarding Leads as soon as possible.

- b.** All staff that are made aware of, observe something that concerns them must record this on safeguarding software - My Concern.
- c.** A copy of the disclosure form can be found in the Safeguarding area on the staff shared drive.
- d.** File records are kept securely for any student on a child protection plan (CPP – Children Act, 5.47) or for any student monitored for child protection purposes. In addition, records will be kept for Children in need (Children Act, 5.17).
- e.** These records and details of how the concern was followed up and resolved are stored securely on the school communications system (My Concern). This must include evidence of communications and safeguarding checks of any alternative provision or pupil referral unit the child may be placed in by the school.
- f.** If a student transfers from a school within BMAT, any child protection notes will be forwarded to the student's new school marked "confidential" and for the attention of the receiving school's Designated Safeguarding and Child Protection Lead.
- g.** Where a student leaves the school, the DSLs will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the student arrives.

**17. Safer Recruitment – Part 3 of 'Keeping Children Safe in Education'** (for further information, see the [BMAT Recruitment and Selection Policy](#)): Every effort will be made to ensure the safe recruitment of staff and all legislation regarding safer recruitment will be followed. This includes:

- a.** Following statutory EDBS and DBS guidelines re: checks on staff, including enhanced DBS checks on governors.
- b.** Ensuring that information on all checks are recorded in the single central record of BMAT's constituent schools and held in individuals' personnel files, where appropriate in accordance with Data Protection Regulations.
- c.** Requiring a standardised application form and not just a CV.
- d.** Stating clearly on any advertisement our commitment to safeguarding children.
- e.** Validating as far as possible qualifications, experience, references and expertise.
- f.** Verifying identity and the right to work in the UK.
- g.** Examining all career breaks, sudden job changes and/or dismissals.
- h.** As part of the shortlisting process, BMAT will consider carrying out an online search as part of their due diligence on the shortlisted candidates.
- i.** Maintaining a single, central record of all staff.
- j.** Checking DfE Teacher Services for Teacher Prohibition Orders and ensuring that candidates are not subject to any sanction or restriction imposed (that remains current) by the GTCE before its abolition in 2012.



- b.** Familiarise themselves with the [Student Behaviour Policy](#), and the safeguarding response to children who are absent from education as well as measures to prevent any form of bullying/child-on-child abuse.
- c.** All staff will read and understand Part 1 and annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and read Part 5 of 'Keeping Children Safe in Education' for Child-on-child sexual violence and sexual harassment.
- d.** Familiarise themselves with the Safeguarding Teams (Appendix A), including the role and identity of the Designated Safeguarding Leads and Deputy Designated Safeguarding Leads.
- e.** Be aware of indicators of any kind of abuse, exploitation and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation so that they are able to identify children who may be in need of early help or protection.
- f.** Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.
- g.** Be aware that technology can have an impact on safeguarding and wellbeing issues, where children and young people can be victims and perpetrators of abuse.
- h.** Be aware that behaviours linked to issues such as unexplainable and/or persistent absences from education and consensual/non-consensual sharing of nudes/semi-nudes can be signs that children are at risk.
- i.** Staff should always be vigilant and always refer safeguarding and child protection issues to the appropriate member(s) of the Safeguarding Team.
- j.** Monitor vulnerable students and promote early identification and assessment by recording information on My Concern and sharing it swiftly with Heads of Year, the Senior Leadership Team and the Safeguarding Team.
- k.** Challenge those who do not appear to be taking action.
- l.** Employ their training to distinguish between an 'early-help concern' and an immediate danger or risk of harm. If unsure, staff are expected to seek advice from a member of the Safeguarding Team.
- m.** If staff have a mental health concern about a student, in some cases this can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should take immediate action by recording this concern on My Concern and following the procedures in Part IV.
- n.** If staff have a health or mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.
- o.** Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- p.** Never allow professional relationships to interfere with their duty of care towards students.

- a. Leadership and vision in respect of safeguarding and child protection – ensuring a ‘whole school safeguarding culture’. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.
- b. Mechanisms to assist staff to understand and discharge their role and responsibilities, including training to all staff on the signs of abuse, the appropriate action and how to protect themselves from allegations.
- c. That appropriate referrals are made to the relevant agencies and will act as a point of contact with the safeguarding partners.
- d. That they liaise with the three safeguarding partners and work with other agencies in line with [Working Together to Safeguard Children](#). Designated safeguarding leads will use the [NPCC](#) guidance on ‘When to call the police’, when considering whether they should call the police.
- e. That the Safeguarding Team, SLT, LGB and the Board are held to account on all safeguarding and child protection issues.
- f. That students are taught the importance of safeguarding and child protection, including e-safety. In addition, students will be empowered to understand Consent and assisted in recognising if they are at risk of abuse.
- g. That they ensure the voices of children are heard including developing the knowledge and skills to encourage a culture of listening and reducing barriers to disclosure.
- h. That the Safeguarding Team receives the appropriate formal training annually, with non-formal updates on a regular basis.
- i. That staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. BMAT schools will follow [mental health and behaviour in schools guidance](#) and [Rise Above](#) materials will be used within the schools’ PSHE/RSE programme.
- j. That they promote the educational outcomes of children that have welfare and child protection issues and identify the impact that safeguarding issues may have on their attendance, engagement and achievement at school.
- k. To keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. In order to ensure this, providing training and reminders to all staff in the effective use of My Concern.
- l. That they ensure that all files/records are kept securely and where a child leaves the school, the DSL will ensure their child protection file is transferred securely to the new school within 5 days of an in-year transfer of the start of a new term.

**24. School Principals/Co-Headteachers and Senior Leadership Teams are responsible for:**

- a. Ensuring a whole school safeguarding culture.
- b. Supporting the Safeguarding Team and ensuring that all members, including Governing bodies have received the appropriate training.
- c. Ensuring that all members of BMAT have understood and adhere to this policy as well as all related policies as set out in paragraphs 21 and 22 and Part One of [‘Keeping Children Safe in Education’](#).

- d. Overseeing the safe recruitment of all staff.
- e. Handling allegations against staff or ensuring that they are handled by an appropriate delegate. Any concerns should be raised as reasonably practical to the Principal/Co-Headteacher. If the concern relates to the Principal/Co-Headteacher it should be referred to the Whistleblowing officer (Ms Kathryn Burns, the BMAT CEO and Accounting Officer). If the concern relates to the Whistleblowing officer, then it should be referred to the Chair of the Trust via the following email address – [clerk@beaconacademytrust.co.uk](mailto:clerk@beaconacademytrust.co.uk). The Whistleblowing policy can be found on the school websites.
- f. Ensuring that students are taught the importance of safeguarding and child protection, including online safety with a more personalised approach for more vulnerable children, children with SEND if required.

**25. The BMAT Trust Board is responsible for ensuring that BMAT:**

- a. Is mindful of its statutory duties to:
  - Safeguard and promote the welfare of children
  - Have regard to any statutory guidance on safeguarding, issued by the Secretary of State for Education
  - Ensure the suitability of staff, supply staff, volunteers, contractors and proprietors
- b. Has an effective Safeguarding and Child Protection Policy, which complies with child protection legislation, and is reviewed at least annually.
- c. Uses safer recruitment procedures.
- d. That safeguarding training for staff and students, including online safety training is part of the whole school approach and curriculum planning.
- e. Ensuring that all staff have regard to the Teachers' Standards (TS7) – Managing behaviour effectively to ensure a good and safe learning environment.
- f. Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
  - I. Making sure that staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - II. Reviewing the DfE's filtering and monitoring standards and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.
  - III. Ensuring that all filtering and monitoring requirements apply to the use of generative AI in Education as highlighted in the DfE published [Generative AI: product safety expectations](#).
- g. When carrying out the Prevent duty, as required under section 26 of the Counter Terrorism and Security Act, BMAT Trust Board are required to follow the Home Office's 'Revised [Prevent duty guidance: for England and Wales](#)'.

**26. The BMAT board appoints a Safeguarding Trustee who is responsible for:**

- a. Ensuring that all members of BMAT have understood and adhere to this policy as well as all related policies as set out in paragraph 21; and Part One of 'Keeping Children Safe in Education'.
- b. Ensuring safeguarding audits are carried out and scrutiny of reports to report to the Board. Safeguarding effectiveness a standing item in Standards and Effectiveness and on LGB agenda to review at school level.
- c. Ensuring that the safeguarding policies and procedures are effective and up to date.
- d. Deals with allegations against the Principal/BMAT CEO and the Trust Executive as required.

**27. Travel between both sites (Beal Sixth form):**

- a. Beal Sixth Form will ensure its risk assessment and health & safety policies and procedures for travel between sites facilitates the maintenance of safe travel. This includes risk assessments in cases of students travelling with a medical condition
- b. To ensure that considerations for safeguarding are given to student travel between The Forest Academy site and the Beal High School site, the Safeguarding Teams will be involved in quality assuring any risk assessments.
- c. Copies of risk assessments will be kept with the safeguarding teams on both sites.
- d. The purpose is for the team to advise on any potential child protection issues that may arise.
- e. It is the role of the 6<sup>th</sup> form team to liaise with a Safeguarding Officers.

**V. PROCEDURE – CONCERNs ABOUT A STUDENT**

**28.** Anyone who receives a disclosure/allegation of abuse, exploitation or neglect, or who suspects that abuse may have occurred **must act on and report it immediately** to the Safeguarding Team (See Appendix A – Safeguarding Team). **Staff cannot promise confidentiality to a student.**

**29.** Pastoral staff and Safeguarding teams will ensure that all safeguarding concerns are recorded clearly and on the same day on My Concern Safeguarding software, with details of actions taken. This is to ensure accurate records are kept and allows the school to identify patterns. **This record keeping is an essential element of the schools' safeguarding culture.**

**30. If a child discloses a safeguarding issue to you, you should:**

- a. Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- b. Stay calm and do not show that you are shocked or upset
- c. Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- d. Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- e. Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not include your own judgement or assumptions on it

- f. Sign and date the write-up, attaching it to a Safeguarding disclosure form and pass it on to the designated safeguarding lead(s). Alternatively, if appropriate and advised to do so make a multi-agency referral (MARF) to Children's Social Care, adult social services and/or the police directly, and tell the designated safeguarding lead(s) as soon as possible that you have done so

**31. Safeguarding Disclosure Forms must be passed on to the DSL/DDSL on the same day (or immediately if high risk) a disclosure from a student is received**, using the student's own words where appropriate. There should be only one copy of this that must be given to the Safeguarding leads where possible or to another member of the Safeguarding Team. No other paper or electronic copies should be kept. The safeguarding team will ensure these are logged on My Concern.

**32.** Staff must not take any further action themselves. This includes contacting parents or outside agencies.

**33.** If a child/young person is in immediate danger, a referral **must** be made to social services and/or the police immediately. Anyone can make a referral, but the designated safeguarding lead(s) must be informed as soon as possible if a referral is made.

**34.** Any member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police and the Designated Safeguarding Lead or deputy, personally. Staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out or likely to be carried out. Unless the teacher has good reason not to, they should still discuss any case with the school's designated safeguarding lead (or deputy) and involve children's social care as appropriate.

**35.** Staff should take further action if they feel that BMAT has failed to act appropriately. This may involve reporting the matter to the Named Governor for Safeguarding and Child Protection, LADO, Children's Social Care, the NSPCC or the Police. The BMAT Whistleblowing Policy sets out the procedure for handling concerns.

**36.** The Safeguarding Team will **immediately refer** cases of suspected abuse or an allegation of abuse to the relevant investigating agency. Any referral will be **confirmed in writing within 24 hours**. Where possible, MARF referral forms should be used. Where the allegation is against a member of staff, the school Principal/Co-Headteacher must first be informed. Unless it is about the Principal/Co-Headteacher themselves, then it should be referred to the Whistleblowing officer (Ms Kathryn Burns, the BMAT CEO and Accounting Officer). See Paragraph 24e for information.

**37.** If the Safeguarding Team is unsure about whether a formal referral should be made, advice should be sought from social services, the NSPCC or the Redbridge Child protection Team or the Social Services department in the local authority where the child lives.

**38.** All disclosures and referrals will be recorded by the Safeguarding Team on My Concern safeguarding software.

**39.** BMAT will inform parents/carers of its actions unless doing so could place the child at greater risk of harm or impede a criminal investigation.

**40. Early Help: Staff should be alert to the potential need for early help for a child. For e.g. a child who:**

- a. Has certain health conditions and has specific additional needs
- b. Has an Education Health and Care Plan (EHCP)
- c. Has a mental health need

- d. Is showing signs of being drawn into anti-social or criminal behaviour
- e. Who frequently goes missing from education, home or care
- f. Has an explainable absence or is persistently absent from education
- g. Has experienced multiple suspensions or is at risk of permanent exclusion from school and in Alternative Provision or a Pupil Referral Unit
- h. Has a parent in Prison
- i. At risk of 'honour'- based abuse
- j. Has experienced domestic abuse at home or within their own intimate relationships.

**41.** Members of the safeguarding team may use a CAF (Common Assessment Framework) if consent from the family has been obtained or a MARF for families about whom we have concerns and where there is likely to be multi-agency working.

**42.** In addition to working with the designated lead, staff may be asked to support Children's Social Care/Police/PREVENT panels to take decisions about individual students.

**43.** BMAT will take any disclosure or allegation of abuse seriously; it will consider the 'unthinkable' and challenge when required.

**44.** Searching, Screening and Confiscation: school principals and authorised members of staff have the statutory power to search students or their possessions, without consent, where they have reasonable grounds for suspecting that they may have prohibited item/s on their person:

**45.** We will allow access for Children's Social Care and the Police, where appropriate, to conduct a Section 17 or 47 Assessment. This will include being aware of the requirement for children to have an Appropriate Adult with them when being questioned by the police. Further information can be found in the Statutory guidance - PACE Code C 2019.

## **VI. PROCEDURE – SUPPORTING STUDENTS**

**46.** We support all students and adhere to statutory timescales.

**47.** The Safeguarding Team is responsible for ensuring that we have an up-to-date list of these groups of students.

**48.** BMAT will endeavour to support students through:

- a. The curriculum and school ethos, which promote a positive, supportive and secure environment and which give all students and adults a sense of being respected and valued as well as ensure they recognise when they are at risk and how to get help when they need it.
- b. This will include covering relevant issues through our Relationships and Sex Education and Health Education curriculum, which was compulsory since September 2020. Details of this can be found in our [BMAT RSE Policy](#).
- c. Our Curriculum is broad and balanced and aligned with the DfE's RSHE guidance. Students are taught about safeguarding, including online safety.
- d. Encouraging students to report safeguarding or child protection concerns.
- e. Reassuring victims or sexual harassment and/or sexual violence that they will be taken seriously and will be supported and kept safe. No victims will ever be made to feel ashamed for making a report. Ensure BMAT schools are adhering to the 'Sexual violence or harassment between children' procedure.

- f. The consistent implementation of behaviour management policies.
- g. Regular liaison with agencies that support students and their families.
- h. The development and support of a responsive and knowledgeable staff group.
- i. Keeping an accurate record on My Concern safeguarding software and critical incident proformas so that patterns can be identified, thereby keeping children safe and appropriate actions taken.

**49. Children who are absent from Education or persistently absent from education:** A student absent from education for ten days could be a potential indicator of abuse and neglect. Should a student be missing in education without contact from their parent or carer, this will be reported to the home local authority where they live. The Attendance officer will inform the Designated Lead and the Deputy designated lead. Parents will ensure that the school has at least two emergency contacts for their child.

**50. Elective Home Education:** Where a parent/carer expresses an intention to remove a child from school to educate at home, the school will work with all relevant professionals including the home local authority before a final decision is made to ensure the best interests and most suitable education of each child, particularly if vulnerable or if a child has SEND.

**51. Pupils with a social worker (Child in Need and Child Protection Plans):** Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- a. Responding to unauthorised absence or missing education where there are known safeguarding risks
- b. The provision of pastoral and/or academic support

**52. BMAT supports students on the Child Protection Register or for whom it has child protection concerns by:**

- a. Following the guidance set out in any child protection plans.
- b. Ensuring that they know and are comfortable about whom they can approach for help.
- c. Monitoring their welfare carefully.
- d. Attending any child protection meetings held on their behalf.
- e. Monitoring their attendance carefully and reporting any unexplained absence to Children's Social Care.
- f. Monitoring their academic attainment carefully.
- g. Enlisting the support of and liaising with other agencies as appropriate.
- h. Checking that they have access to all elements of school life, including visits and other activities.
- i. Informing their HOY that they are on a CPP, without breaching confidentiality, so that s/he knows to register any concerns with the Safeguarding Team.

j. The Safeguarding team have regular meetings to monitor and track all vulnerable students.

**53. Looked After Children:** We keep a list of students who are looked after by the Local Authority or by someone other than a parent or in kinship care arrangements. To narrow the gap between these students and their peers, we monitor their attendance, progress and wellbeing carefully by:

- a. Being involved in and following the guidance set out in the student's personal education plan (PEP).
- b. Arranging for a member of the Safeguarding Team (or for another teacher to whom the child relates well) to take a particular interest in the student's welfare.
- c. Offering in school support such as anger management and assertiveness or social skills training.
- d. Attending any liaison or review meetings held on their behalf, including acting as their advocate at such meetings should they request it, and keeping in touch with social workers and/or carers.
- e. Monitoring their attendance carefully and reporting any unexplained absence to Children's Social Care and the Educational Welfare Service.
- f. Monitoring their academic attainment carefully.
- g. Informing their Head of Year that they are on the looked after register, without breaching confidentiality, so he/she knows to register any concerns with the Safeguarding Team.
- h. Enlisting the support of and liaising with other agencies as appropriate.
- i. Checking that they have access to all elements of school life, including visits and other activities.

**54. Young Carers:** It is the responsibility of the Safeguarding Team to keep a record of those students who play the part of a major carer for a family member; and to offer a support package appropriate to their individual situation.

**55. SEN/D:** These children or children with a specific health condition are more likely to be abused or neglected and for this to go unnoticed. Disabled children may be less able to recognise or understand that they are being abused. Communication difficulties may make it harder for them to disclose abuse and/or dependency on their care giver may mean they have no-one to tell. To ensure that these students have an added layer of protection, our SENco belongs to the Safeguarding Team.

**56. Private Fostering:** is when a child under the age of 16 (under 18 if disabled or vulnerable) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Schools have a mandatory duty to inform the local authority of children in such an arrangement so that safeguarding checks can be carried out. It is important to us to support our pupils and their families as well as our staff

**57. Children and the Court System:** BMAT will have due consideration to the "Ministry of Justice – Child arrangements information tool".

**58. Children with family members in prison:** It is recognised that these children may be at risk of poorer outcomes. Staff will have due regard to Nicco guidelines (National Information Centre on Children of Offenders).

**59. Homelessness:** The Designated Safeguarding leads will have due regard to the housing contacts and charity organisations to support families.

**60. Mental Health:** is the concern of the whole community and we recognise that we play a key part in this. We strive to develop emotional wellbeing and resilience in all our pupils and staff, as well as provide specific support for those with these additional needs. We understand that the risk factors which increase someone's vulnerability along with the protective factors that can promote resiliency. The more key risk factors present in an individual's life, the more protective factors or supportive interventions are required to counterbalance.

**61. Domestic abuse:** Children can be victims of domestic abuse. They may see, hear or experience the effects of domestic abuse in the home or in their own intimate personal relationships. All staff should reassure victims of domestic abuse that they are being taken seriously and will be supported.

**62. Children placed in an alternative provision (AP) by the school:** It continues to be the responsibility of the safeguarding and pastoral team to ensure the pupil is safeguarded, is attending and that the placement meets the pupil's needs. The school will ensure:

- That the alternative provider is carrying out appropriate safeguarding checks on individuals working at the AP provider. This includes written confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk i.e. staff changes. Written confirmation is stored on safeguarding software – My Concern.
- That they hold records of the address of the alternative provider or any site the child may attend (stored on My Concern).
- That the school regularly reviews the alternative provision placements made, maintaining accurate individual student records linked to attendance, safeguarding, attainment and progress
- That the school regularly checks that the child is attending the placement, continues to be safe and meets the child's needs.
- Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary.

**63. Records and Monitoring:** Accurate records are essential to robust child protection practice.

- Anyone receiving a disclosure of abuse or noticing signs of possible abuse must make an accurate record within 24 hours of reporting the incident, noting what was seen or said, putting the event into context, and giving the date, time and location. This record must be signed and dated.
- File notes are kept for any pupil on child protection plan (CPP) or for any pupil monitored for child protection reasons until their 25<sup>th</sup> birthday unless they transfer to another school.
- These records are kept in a locked cupboard, electronically on a secure area of the school communications system and My Concern Safeguarding software
- If a pupil transfers from the school any child protection notes will be forwarded to the pupil's new school marked "confidential" and for the attention of the receiving school's designated Child Protection Coordinator. A signature of receipt will be requested. Local schools' files will either be collected, or hand delivered.
- Sharing information: any request/s for information will need to be supported by either signed consent or a data request form outlining why the information is required and how it will be handled. Safeguarding children will always be our priority, therefore there may be occasions when gaining consent is either not possible or puts a child at risk.

- f. In accordance with Keeping Children Safe in Education guidance, the data protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.
- g. Please see Appendix E Beal 6<sup>th</sup> form Reporting flowchart for safe, secure and timely sharing of information procedures across both sites of Beal 6<sup>th</sup> form.

## **VII. PROCEDURE - SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS.**

- 64. In keeping with Part 4 of Keeping Children Safe in Education (KCSIE), the following guidance also applies to supply staff and volunteers.
- 65. Part 4 of KCSIE is separated into two sections. Section one provides procedures should concerns and allegations against staff who meet the harms test. Section two provides procedures as to how lower-level concerns and allegations that do not meet the harms test are raised.
  - a. Allegations that meet the harms threshold include where a member of staff, volunteer, contractor has allegedly behaved in a way that has or may have harmed a child or where they have allegedly behaved in a way that indicates he/she may pose a risk of harm to children
  - b. Low level concerns include any alleged behaviour that is inconsistent with the staff code of conduct, including inappropriate for e.g. being over friendly with children, using inappropriate sexualised, intimidating or offensive language.
- 66. The following may also apply where a member of staff, volunteer or supply staff is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children.
- 67. It is essential that our high standards of professional responsibility are displayed when adults working within BMAT are accused.
- 68. Corporal or physical punishment of children is unlawful. Physical restraint of children is only permitted if absolutely necessary if the child or others are at risk. Excessive physical intervention or constant shouting may constitute abuse.
- 69. Low level concerns should continue to be reported to the Principal/Co-headteacher. If an allegation is made against a member of staff that does meet the harms threshold, the school Principal (or an appropriate delegate) should contact the BMAT CEO, Local Authority Designated Officer (LADO) and BMAT Chair and Designated Safeguarding Trustee.
- 70. They will decide whether the incident should be referred to Children's Social Care (LADO) and/or the police. If this is agreed, the school principal will inform Children's Social Care/the police by telephone and follow this with **written confirmation within 24 hours**.
- 71. A referral will be made to the DBS where it is thought that the individual facing the allegation has engaged in conduct that harmed or is likely to harm a child.
- 72. In addition, the school principal should inform the BMAT Chair, BMAT Safeguarding Trustee and LGB Chair and LGB Safeguarding lead for child protection.
- 73. Should the allegation be against the school Principal, the CEO/Accounting Officer should contact the LADO and then inform the chair of governors.

74. If it is decided that a referral to Children's Social Care is not necessary, it may still be appropriate to conduct an internal investigation in accordance with the [BMAT Disciplinary Procedure](#) and in liaison with HR.

75. The accused individual will be informed of the concerns or allegations and the likely course of action as soon as possible after speaking to the LADO (and the police or social services, where necessary). Where the police and/or social services are involved, only information that has been agreed with those agencies will be shared with the accused individual. Parents/carers will also be informed of the need to keep the allegations confidential whilst investigations are ongoing. Parents/carers will be kept informed of the progress of the case and the outcome, where there is not a criminal prosecution.

76. The parents/carers of the child/children concerned will be informed of the allegation(s) as soon as possible if they do not already know.

77. Where appropriate, the suspension of the member of staff will be carefully considered; advice will be sought from the LADO, police and/or social services, as appropriate. If immediate suspension is considered necessary, the rationale for this will be recorded with the LADO, including information about the alternatives to suspension that have been considered but rejected. Written confirmation of suspension will be provided to the accused within **one working day**, and the individual will be given a named contact at BMAT and their contact details.

78. If BMAT is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

79. If further action other than suspension is needed, steps will be taken with the LADO to initiate the appropriate action and/or liaise with the police and/or social services as appropriate.

80. Effective support will be provided to the accused individual. This may include the appointment of a named representative to keep them informed of the progress of the case (e.g. a trade union representative).

81. Where no further action is required, details and decisions should be recorded in a confidential file. The LADO and BMAT Chair, BMAT Safeguarding Trustee and LGB Chair and LGB Safeguarding lead for child protection still need to be informed.

82. Any member of staff who is concerned about the conduct of another adult on BMAT premises should contact the Safeguarding Team immediately. Should the concern relate to the school principal, the contact should be the BMAT CEO, who will then inform the LADO and the BMAT Chair, BMAT Safeguarding Trustee and LGB Chair and LGB Safeguarding lead for child protection.

83. Any member of staff who is concerned about safeguarding practices within BMAT should refer to the BMAT Whistleblowing Policy and follow the procedures therein.

84. If an allegation is shown to be deliberately invented or malicious, disciplinary or legal action will be considered and most likely taken against those concerned.

85. Record-keeping, references and confidentiality:

- BMAT will make every effort to maintain confidentiality while allegations of abuse are being investigated. Advice will be taken from the LADO, police and/or social services, as appropriate (e.g. on who needs to know about the allegation(s) and what information can be shared).
- Records will be kept, including a clear and comprehensive summary of allegation(s) and action(s) taken.

- c. The records of any allegations that are found not to have been made maliciously will be stored on the personnel file of the accused individual and a copy will be provided to the individual. Records will be retained until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.
- d. The records of any allegation that is found to be malicious will be deleted from the accused individual's personnel file.
- e. When providing employer references, no reference will be made to allegations which have been shown to be false, unsubstantiated or malicious.

86. If any member of BMAT staff receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, they will follow our school safeguarding policies and procedures, informing the LADO, as they would with any safeguarding allegation.

### **VIII. PROCEDURE – CHILD-ON-CHILD ABUSE**

87. In accordance with Keeping Children Safe in Education, BMAT recognises that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter” or “part of growing up”. It is a minimum expectation that staff will not ignore child-on-child abuse as outlined in the BMAT Employee Code of Conduct.

88. Most cases of students hurting other students will be dealt with under the [BMAT Student Behaviour Policy](#), but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- a. Is serious, and potentially a criminal offence e.g. gang involvement
- b. Could put pupils in the school at risk
- c. Is violent
- d. May occur in intimate personal relationships between peers
- e. Involves pupils being forced to use drugs or alcohol
- f. Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, ‘upskirting’ or sexually inappropriate pictures or videos (including sexting). Schools will use the following guidance - UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.
- g. Is any Criminal activity

89. If a pupil makes an allegation of abuse against another pupil:

- a. You must tell the designated safeguarding lead(s) and record the allegation, but do not investigate it;
- b. The designated safeguarding lead will contact the local authority Children's Social Care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- c. The designated safeguarding lead will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed; and

- d. The designated safeguarding lead will contact the children and adolescent mental health services (CAMHS), if appropriate.

**90. BMAT will minimise the risk of child on child abuse by:**

- a. Challenging any form of derogatory or sexualised language or behaviour;
- b. Being vigilant to issues that particularly affect different genders – for example, upskirting, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys;
- c. Being vigilant to the increased risks for LGBTQ+ children and/or those that are perceived to be.
- d. Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent and that LGBTQ+ inclusion is part of the statutory relationships and sex education (RSE) curriculum;
- e. Ensuring schools provide preventative education via the pastoral systems and the PSHE/RSE curriculum that creates a culture that does not tolerate any form of prejudice or discrimination, including sexism and misogyny/misandry.
- f. Ensuring students know they can talk to staff confidentially, creating a culture where students can speak out or share their concerns with members of staff.
- g. Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy; and
- h. Ensuring that unstructured activity is monitored by senior members of staff at peak times and duty teams during break and lunchtimes e.g. school gates are monitored by senior members of BMAT staff at peak times

**IX. PROCEDURE – CHILD-ON-CHILD SEXUAL VIOLENCE, SEXUAL HARASSMENT AND HARMFUL SEXUAL BEHAVIOUR (See Appendix B for an overview)**

**91. BMAT are committed to promoting a safe and nurturing environment where thoughts, behaviours, & attitudes are sex positive. Normalising and trivialising sexual violence, misogyny, ‘slut shaming’, victim blaming, and sexual harassment are not tolerated. BMAT is aware of the importance of:**

- a. Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- b. Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- c. Challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and
- d. Understanding that all the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language

92. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

93. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This is likely to adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers.

94. 'Sexual harassment' means unwanted conduct of a sexual nature, whether online or offline. It is likely to violate a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Examples of sexual violence/harassment are included in APPENDIX B to this Policy.

95. Sexual violence: BMAT are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the [Sexual Offences Act 2003](#) as described in APPENDIX F (Specific Safeguarding Issues)

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

97. Harmful sexual behaviour (HSB): is an umbrella term that describes a range of sexual behaviours. Hackett et al. (2016) define HSB as "sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, that may be harmful towards self or others, or be abusive towards another child, young person or adult".

98. This definition captures a range of behaviours, both offline and online, such as sexualised, gendered or sexist name calling, sexual image sharing without consent, unwanted sexual touching, sexual assault and rape. Examples of sexual violence/harassment alongside our internal and external responses are included in APPENDIX B to this Policy.

99. Sexual behaviours are seen across a continuum ranging from normal and appropriate sexual behaviours that are expected from people of a certain developmental age through to sexual behaviours that are inappropriate, problematic, abusive or violent.

Normal	<p>Developmentally expected</p> <p>Socially acceptable</p> <p>Consensual, mutual, reciprocal</p> <p>Shared decision making</p>
Inappropriate	<p>Single instances of inappropriate sexual behaviour</p> <p>Socially acceptable behaviour within peer group</p> <p>Context for behaviour may be inappropriate</p> <p>Generally consensual and reciprocal</p>

Problematic	<p>Problematic and concerning behaviours</p> <p>Developmentally unusual and socially unexpected</p> <p>No overt elements of victimisation</p> <p>Consent issues may be unclear</p> <p>May lack reciprocity or equal power</p> <p>May include levels of compulsivity</p>
Abusive	<p>Victimising intent or outcome</p> <p>Includes misuse of power</p> <p>Coercion and force to ensure victim compliance</p> <p>Intrusive</p> <p>Informed consent lacking or not able to be freely given by victim</p> <p>May include elements of expressive violence</p> <p>Violent</p> <p>Physically violent sexual abuse</p> <p>Highly intrusive</p> <p>Instrumental violence which is physiologically and/or sexually arousing to the perpetrator</p> <p>Sadism</p>

**100.** Managing reports relating to current students: Part 5 of Keeping Children Safe in Education sets out how schools and colleges should manage reports of child-on-child sexual violence and harassment. The needs and wishes of the victim are central.

**101.** The guidance also links through to a further Department for Education (DfE) advice document from September 2021: '[Sexual violence and sexual harassment between children in schools and colleges](#)'.

**102.** Reports of child-on-child sexual violence/harassment are likely to be complex, so they should be managed on a case-by-case basis. All staff should be trained to manage a report, in line with the following guidance.

**103.** A report of child-on-child sexual violence or harassment must be referred immediately to the designated safeguarding leads or deputy, and all alleged victims must be reassured that they are being taken seriously, will be kept safe, and will be supported. Staff must only share the report with the necessary people.

**104.** Children may not always make a direct report, so staff must be vigilant to overheard conversations or observed behaviour changes and refer any concerns immediately to the DSL/DDSL and log on My Concern.

**105.** In referring a report to the designated safeguarding lead or deputy, the member of staff should write up a thorough summary – it is essential that a written record is made.

**106.** Confidentiality should not be promised in the initial stages, as it is highly likely that concerns will have to be shared further.

**107.** The designated safeguarding lead or deputy should make an immediate risk assessment, taking into account: the victims' need for protection and support, the needs of the alleged perpetrator(s) and all other children involved, particularly if they are aware of the incident. The risk assessment will not replace that of any expert report e.g. from Children's Social Care and must be recorded in writing.

**108.** The designated safeguarding lead or deputy must decide as soon as possible whether to manage the case internally, take a multi-agency approach, refer to social services, or report to the police. It is likely that professional risk assessments by e.g. social workers and/or sexual violence specialists will be required. The following [advice](#) is used to support in the decision when to engage the police.

**109.** The decision on multi-agency reporting will affect the decision when to inform the alleged perpetrator(s). Generally, relevant agencies should be consulted as to how the alleged perpetrator(s) will be informed of the allegations.

**110.** In making their decision, the designated safeguarding lead or deputy should consider:

- Victims' wishes in terms of how the report should proceed;
- The nature of the alleged incidents, including whether a crime may have been committed;
- The ages and developmental stages of all children involved;
- Whether the alleged incident forms part of a pattern of abuse;
- Ongoing risks, to any member of the BMAT community.

**111.** Child-on-child sexual violence or harassment may involve an online element. Those involved in managing such a report should refer to the '[Searching, Screening and Confiscation](#)' advice for schools, and '[UKCCIS Sexting Advice](#)' for schools and colleges. Illegal images of a child must not be forwarded by staff.

**112.** Children sharing a classroom: In any case of alleged sexual violence or harassment, it should be considered whether the alleged perpetrator(s) should be removed from any classes they share with the alleged victim(s). In serious cases, this will probably form an essential part of an adequate response. Efforts should also be made to consider how to keep the alleged perpetrator(s) and victim(s) apart outside of the classroom e.g. during breaks.

**113.** Where a report made is determined as unsubstantiated, unfounded, false or malicious the DSL/DDSL will consider whether the child that has made the allegation is in need of help and referral to children's social care. If a report is malicious then the school will consider disciplinary action if appropriate.

**114. The Ongoing Response (to be tailored on a case by case basis)**

- Post-Conviction** - If a child is convicted or receives a caution for a sexual offence, risk assessments should be updated, relevant protections must be in place for all children involved and, if not done already, action in light of the [BMAT Student Behaviour Policy](#) should be considered or reviewed.
- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse.

- c. The needs and wishes of the victim should be paramount (along with protecting the child) in any response. Wherever possible, the victim, if they wish, should be able to continue their normal routine.
- d. Victims may not disclose the whole picture immediately, so it is essential that dialogue is kept open and encouraged. When ongoing support will be required, the victim should be asked if they would like designated trusted adult to talk to about their needs.
- e. While action that would have the effect of isolating the victim should be avoided, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should only be because the victim wants to, not because it makes it easier to manage the situation.
- f. Alternative Provision - whilst victims should be given all the necessary support to remain as normal, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college should be considered. This should only be at the request of the victim, following discussion with their parents or carers. If the victim does move to another educational institution, it must be made aware of any ongoing support needs.
- g. Safeguarding the alleged perpetrator(s) - Alleged perpetrators must still be provided with a sound education. Their age, developmental stage and the stress of being the subject of allegations must be taken into account; as well as posing a risk to others, alleged perpetrators may have unmet needs, which should be assessed or reviewed if appropriate. If the perpetrator(s) behaviour is a symptom of their own abuse or exposure to abusive practices and or materials, advice should be taken, as appropriate, from Children's Social Care, specialist sexual violence services and the police. If the alleged perpetrator(s) move to another school, it must be made aware of any ongoing support needs and where appropriate, potential risks to other children and staff.
- h. Support may include:

NSPCC helpline, Report Abuse in Education on 0800 136 663 or email <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>	The NSPCC have set up a dedicated helpline for victims to report abuse.
Project deSHAME	Provides useful research, advice and resources regarding online sexual harassment
Children and Young People's Independent Sexual Violence Advisors (ChiSVAs)	Provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChiSVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim. Contact details for ChiSVAs

	can be found at Rape Crisis and The Survivors Trust.
Child and adolescent mental health services (CAMHS)	To support with mental health implications for children who have experienced sexual violence
Rape Crisis Centre's	Provide therapeutic support for children who have experienced sexual violence
Internet Watch Foundation	To potentially remove illegal images

## **X. RADICALISATION/PREVENT:**

**115.** Appendix F included in this policy outlines the overall approach to PREVENT Safeguarding. The Counter Terrorism and Security Act 2015 places a duty on specified authorities, which includes schools, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty).

**116.** The school's work on promoting British values and life in Modern Britain via the curriculum underpins this strategy.

**117.** Possible Channel referrals will be discussed by the school Safeguarding Team if appropriate and in accordance with government guidelines. School staff have a statutory duty to inform their safeguarding leads should they have any concerns

## **XI. ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY**

**118.** We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, our school aims to:

- a.** Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- b.** Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- c.** Set clear guidelines for the use of mobile phones for the whole school community
- d.** Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

**119.** The following policies summarise our approach to online safety and mobile phone use:

- a.** BMAT E-Safety Policy
- b.** BMAT Information Technology Security Policy

## **TFA Safeguarding and Child Protection Policy**

### **APPENDIX A: REDBRIDGE LSCB MULTI-AGENCY THRESHOLD GUIDANCE. REDBRIDGE CONTACTS AND LINKS**

Redbridge LSCB Multi-agency threshold guidance:

<http://www.redbridgelscb.org.uk/wp-content/uploads/2015/09/Redbridge-LSCB-Multi-Agency-Thresholds-Document-September-2018-Final.pdf>

Child Protection & Assessment Team	020 8708 3885 <a href="mailto:CPAT.Referrals@redbridge.gov.uk">CPAT.Referrals@redbridge.gov.uk</a>
Children Missing from Education	020 8708 6047 / 86029 <a href="mailto:cme@redbridge.gov.uk">cme@redbridge.gov.uk</a>
Emergency Duty Team EDT (Out of hours: after 5pm & weekends)	020 8708 5897
Local Authority Designated Officer (Helen Curtis)	020 8708 5350 <a href="mailto:lado@redbridge.gov.uk">lado@redbridge.gov.uk</a>
Local Safeguarding Children Board	020 8708 5282 <a href="mailto:LSCB@redbridge.gov.uk">LSCB@redbridge.gov.uk</a>

## TFA Safeguarding and Child Protection Policy

### Appendix B: Overview of Internal and External Responses to Reports of Child-on-Child Sexual Violence or Harassment

<ul style="list-style-type: none"> <li>Internal Management</li> </ul>	<ul style="list-style-type: none"> <li>Early Help</li> </ul>	<ul style="list-style-type: none"> <li>Referrals to Social Services</li> </ul>	<ul style="list-style-type: none"> <li>Referrals to the Police</li> </ul>

		<ul style="list-style-type: none"> <li>Where statutory assessments are appropriate, the designated safeguarding lead or deputy will work alongside the relevant lead social worker, to ensure coordinated support.</li> <li>The outcome of a Children's Social Care investigation is not required to take immediate internal action to ensure the safety and wellbeing of any children involved, but such action should not obstruct a social care assessment.</li> <li>Where Children's Social Care decide that a statutory intervention is not appropriate, the designated safeguarding lead or deputy should be prepared to refer again if they believe a child remains in immediate danger or at risk of harm.</li> </ul>	<p>should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.</p> <ul style="list-style-type: none"> <li>All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It is important that the Safeguarding Team is aware of their local arrangements.</li> <li>Where the police do not take further action, internal and other forms of multi-agency support must still be provided.</li> <li>Delays in the criminal investigation process should not obstruct immediate and ongoing internal or other multi-agency approaches to ensure the safety and wellbeing of the children involved.</li> </ul>
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## TFA Safeguarding and Child Protection Policy

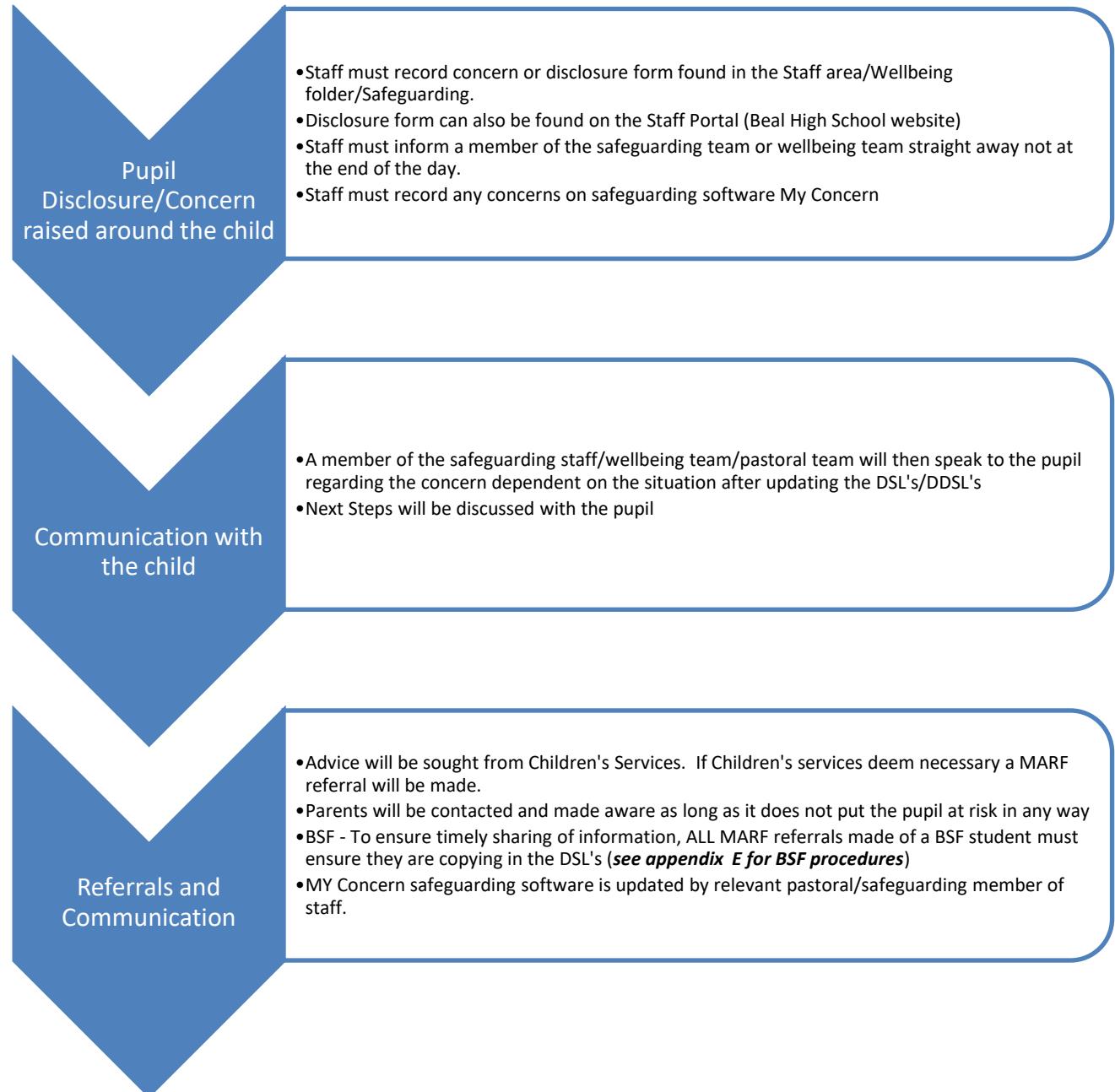
### **APPENDIX C – USEFUL CONTACTS/LINKS**

Annex B in KCSIE contains important additional information about specific forms of abuse and safeguarding issues with specific advice from a variety of organisations. This should be read alongside the following:

- Redbridge Local Authority Designated Child Protection Officer (LADO): Helen Curtis. Telephone 020 8708 5350. Email: [helen.curtis@redbridge.gov.uk](mailto:helen.curtis@redbridge.gov.uk)
- The Prevent Co-ordinator for Redbridge - [prevent@redbridge.gov.uk](mailto:prevent@redbridge.gov.uk) or 020 8708 5230.
- CEOPS: 0870 000 3344; <https://ceop.police.uk/>
- NSPCC Whistleblowing Line: 08000280285; [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- Redbridge Child Protection and Assessment Team: 020 8708 3885 from 9am-5pm; 020 8708 5896 after 5pm
- Children with Disabilities Team: 020 8708 6092; [cwdtduty@redbridge.gov.uk](mailto:cwdtduty@redbridge.gov.uk)
- Redbridge Safeguarding Children Partnership (RSCP): [rscp@redbridge.gov.uk](mailto:rscp@redbridge.gov.uk)
- Lucy Faithful Foundation – [advice](#) on harmful sexual behaviour. Stop it now helpline 0808 1000 900
- [UK Safer Internet Centre: appropriate filtering and monitoring](#)
- [Internet Watch Foundation \(IWF\)](#) – report suspected child sexual abuse images/videos
- CEOP – Concerned about online sexual abuse – make a report [here](#).
- National body for PSHE Education – [PSHE Association](#)
- [Educate against hate](#): Resources to help safeguard students from Radicalisation/extremism.
- [Childline – Get support, information and advice](#) [here](#)
- [NSPCC support and advice](#) [here](#)

## TFA Safeguarding and Child Protection Policy

### Appendix D: Reporting a Concern



## TFA Safeguarding and Child Protection Policy

### Appendix E: Beal 6<sup>th</sup> form Reporting and Sharing information

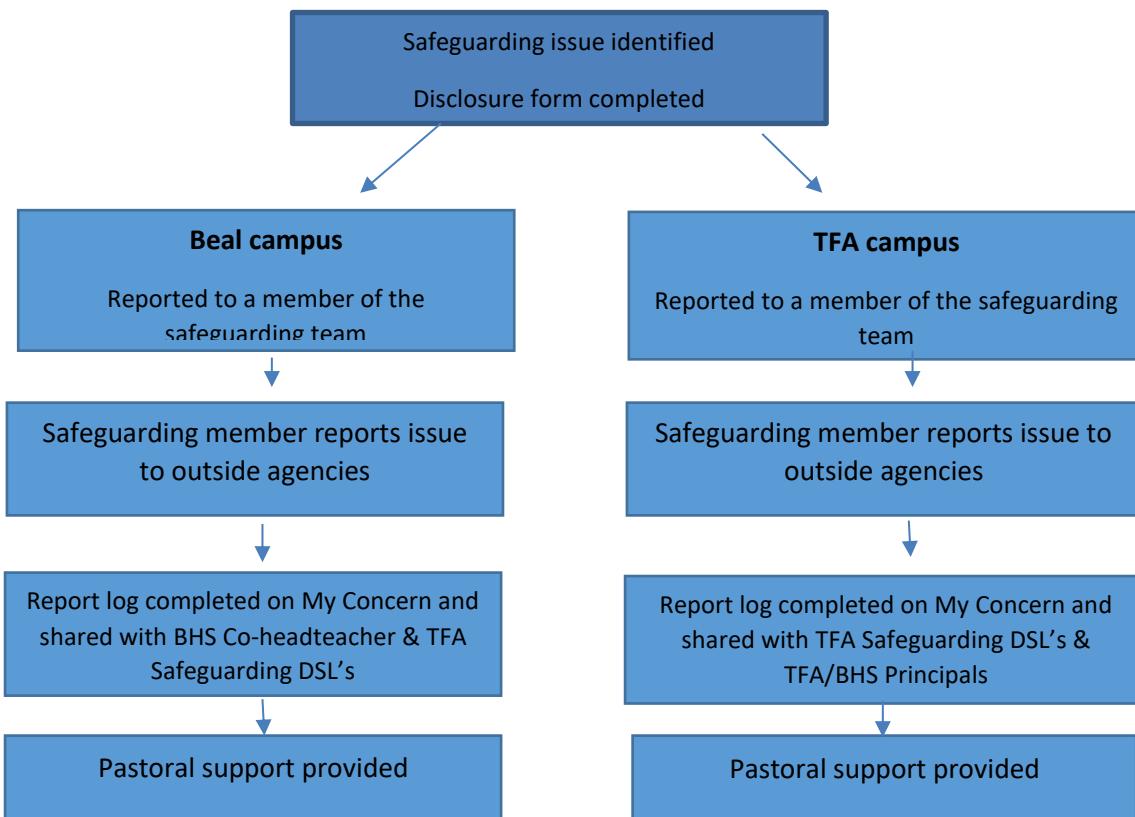
#### Staff reporting a concern about a student:

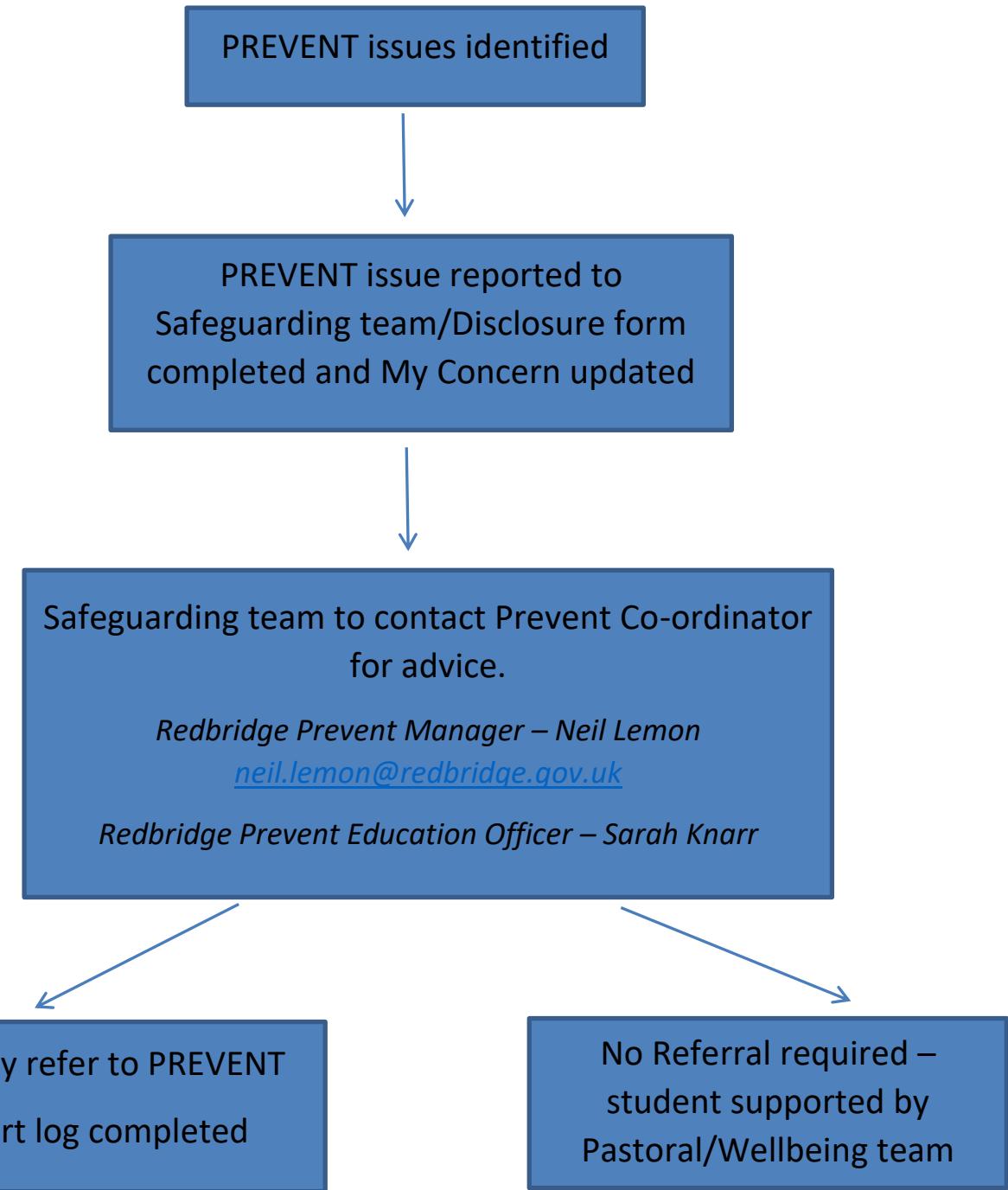
Anyone who receives a disclosure of abuse, an allegation of abuse or who suspects that abuse may have occurred **must act on and report it immediately** to the Safeguarding Team:

- If the concern is of a student on The Forest Academy (TFA) site, the member of staff must inform a member of the safeguarding team on TFA site as soon as possible.
- If the concern is of a student on the Beal High School (BHS) site, the member of staff must inform a member of the safeguarding team on the BHS site as soon as possible

#### To ensure safe and confidential ways of sharing information in a timely manner across both sites:

- The Safeguarding teams must ensure they are copying in the DSL's and BHS Co-Headteacher (DSL) when sending MARF referrals to Social Services
- An accurate and secure electronic report log must be kept on both sites (TFA/BHS) by Safeguarding teams. MyConcern will be used for this purpose.
- The Safeguarding Administrator at TFA will keep an accurate and secure record of all referrals made of Beal 6<sup>th</sup> form students (both sites) by logging details onto MyConcern.
- Beal High School and The Forest Academy Wellbeing/Safeguarding teams will keep minutes of meetings held to discuss progress of CIN/CP/LAC students. Meetings will be held on both sites at least every two weeks.
- The Designated Leads will meet with the Deputy Safeguarding leads on both sites once every half term to ensure consistency of practice and procedure as well as sharing of information.
- Beal 6<sup>th</sup> form students are all registered on the same Sims and a copy of student care plans are kept on sims.





## TFA Safeguarding and Child Protection Policy

### **APPENDIX F: Specific Safeguarding Issues. Recognising different types of abuse**

Abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

- Safeguarding incidents/behaviours can occur between children outside of their school or family environment. Extra-familial harms take a variety of forms for example sexual exploitation, criminal exploitation, county lines and serious youth violence.
- Technology is a significant component of many safeguarding issues and in many cases can take place in parallel via online channels and daily life. Children can abuse their peers online, which can take the form of the non-consensual sharing of indecent images, abusing images and pornography to those who do not want to receive such content. Schools will use the following guidance published on Generative artificial intelligence (AI) products to ensure staff are aware of emerging online challenges posed by artificial intelligence e.g. deepfakes, AI-generated harmful content.
- Physical Abuse: A form of abuse which 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: The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It may involve:
  - Conveying 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 (e.g. interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning).
  - Seeing or hearing the ill-treatment of another.
  - Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

- **Sexual Abuse:** Forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. It may involve:
  - Rape: A commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of B with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
  - Assault by Penetration: A commits an offence if: s/he intentionally penetrates the vagina or anus of B with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
  - Sexual Assault: A commits an offence of sexual assault if: s/he intentionally touches B, the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
  - Physical contact, including assault by penetration (for example rape or oral sex).
  - 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.
  - ‘Upskirting’: The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.
  - Encouraging children to behave in sexually inappropriate ways.
  - Grooming a child in preparation for abuse (including via the internet).
- **Sexual Harassment:** Sexual harassment ‘unwanted conduct of a sexual nature’ that can occur online and offline and can include:
  - sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;

- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos.
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media; and
  - sexual exploitation; coercion and threats.
- Neglect: The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. It may involve:
  - Failing to provide food, clothing, shelter or access to medical care.
  - Failing to protect a child from physical and emotional harm or danger ensure adequate supervision (including the use of inadequate care-givers)
  - Neglect of, or unresponsiveness to, a child’s basic emotional needs.
- Child Sexual Exploitation (CSE):
 

The definition of child sexual exploitation is as follows:

*Child sexual exploitation is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration or non-penetrative acts. It may involve non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.*

CSE involves young people receiving something in exchange for sexual acts. Sexual exploitation can take many forms ranging from seemingly consensual relationships to serious gang and group exploitation. CSE can take many forms and that students may not exhibit external signs of abuse. Therefore staff must be vigilant for the less obvious signs:

- Lots of new electronic equipment, when before there was none.
- Seeming to have extra money to spend.
- Moving away from established friendship groups, older boy/girlfriends, involved with other vulnerable children/adults etc.
- Sharing of nudes/semi-nudes images and/or videos: It is illegal for sexual or indecent images of a child under 18 to be taken and or distributed. They can also be signs that children are at risk. Please read [UKCIS advice](#) on how to respond to an incident as well as adhering to the following:
  - All incidents of sexual images should be reported to the Safeguarding Team. The image/s and the device they are stored within should be confiscated.
  - If there is a concern that the student is at risk of harm, the Safeguarding Team will contact Children's Social Care and/or the police.
  - Members of staff should only view the image(s) if necessary and with a member of the Safeguarding Team present.
  - Members of staff must never copy, print, or share the image(s), unless asked to do so by the Police.
  - The Safeguarding Team will always refer to the police or Children's Social Care if an incident involves an adult; coercion, violence, blackmail, or grooming; concerns about capacity to consent, [e.g. SEN/D]; a child under 13.
- Preventing Radicalisation – Extremism: Children may be susceptible to radicalisation into terrorism. Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  1. negate or destroy the fundamental rights and freedoms of others; or
  2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  3. intentionally create a permissive environment for others to achieve the results in (1) or (2).
- Child Criminal Exploitation (CCE): Occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under

the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Specific forms of CCE can include children being forced or manipulated into committing serious violence towards others, or transporting drugs through county lines. Whilst indicators may be different, both Boys and girls can be at risk of CCE. The following may signal that children are at risk from, or are involved with, serious violent crime:

- Unexplained gifts or new possessions - these can indicate that children have been approached by or involved with individuals associated with criminal networks or gangs;
- Increased absence from school;
- Change in friendship or relationships with others or groups;
- Significant decline in performance;
- Signs of self-harm or significant change in wellbeing; and
- Signs of assault or unexplained injuries.
- County Lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office](#). Should we have reason to believe a pupil has become involved we will make referrals to both the Police and Social Care.
- Female Genital Mutilation ['FGM']: Involves cutting, and sometimes sewing the girl’s genitalia, normally without anaesthetic, and can take place at any time from birth onwards. The procedure has a cultural, rather than religious, origin and is practised by disparate ethnic communities in many countries.
  - The [Female Genital Mutilation Act 2003](#) makes it a criminal offence, not only to carry out FGM in England, Scotland and Wales on a girl who is a UK national or permanent resident but also to take a girl out of the UK to have FGM performed abroad, even to countries where FGM is still legal.

- From 3 May 2015, professionals have a mandatory duty to report such offences to the police.
- The indicators of FGM may initially mirror those of sexual abuse. You may notice, for example, that a girl or young woman shows signs of pain or discomfort, needs to visit the toilet constantly, has vaginal blood loss or is unable to sit comfortably. She may make excuses to avoid PE and other physical activity or refuse to use the school showers. She may also become evasive or fearful if you enquire if she is unwell.
- If she is a BME child, has recently arrived back from a 'holiday' abroad or a period of absence from school, seems to be in pain and has not been taken by her family to see a doctor, you should consider FGM.
- Forced Marriage and Honour Based abuse:

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

It is very different from an arranged marriage, where both young people can make the decision to accept or decline the partner chosen for them by their parents.

- A student who fears that they are likely to be forced into a marriage may disclose to a member of staff. Their initial approach, in common with many disclosures of abuse, may be seemingly innocuous, such as talking about taking a holiday abroad. Their fear, that the proposed holiday will result in a forced marriage, may only become apparent after a number of conversations.
- These young women may also become victims of what is termed honour-based abuse (ABA), described in 'The Right to Choose' Guidance as: 'A variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community. Aside from circumstances of forced marriage, Honour based violence is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture.'
- Forced marriage, here or abroad, is a crime; we will always report to both Police and Children's Social Care.
- Signs may include the withdrawal of a student from school by those with parental responsibility; students being prevented from attending higher education; truancy

or persistent absences; a request for extended leave or a student not returning from an overseas visit; surveillance by siblings/cousins/extended family members at school; and a decline in behaviour, engagement, performance or punctuality.

- **Domestic abuse:** The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Older children may also experience domestic abuse and/or violence in their own personal relationships. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.
- If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#). The Safeguarding team will provide support according to the child's needs and update records about their circumstances.
- **Mental Health:** Mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect, an adverse childhood experience or exploitation. The school has trained professionals and access to a range of advice from external agencies that can support students with a mental health problem. If staff have a mental health concern about a child, they should follow the procedures as set out in this policy and speak to a member of the safeguarding team/DDSL/DSL.
- **Serious violence:** There are higher risk factors which increase the likelihood of involvement in serious violence, such as being male, frequently absent from school or permanently excluded from school. The following advice is provided by the [Home Office](#) and is available for schools. The following may be indicators that children are at risk from, or are involved in serious violent crime:
  - Absence from school
  - A change in friendships or relationships with older individuals/groups
  - A significant decline in performance
  - Signs of self-harm or a change in wellbeing

- Signs of assault of unexplained injuries
- Unexplained gifts or new possessions
- Online safety: The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism misinformation, disinformation 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: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
  - Commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).