



Safeguarding Policy including Child Protection

Nurturing today's young people, inspiring tomorrow's exemplary citizens

Date of Last Review	September 2026
Safeguarding Governor	Dr Sohail Ahmed (Safeguarding Governor)
Designated Safeguarding Lead (DSL)	Mr Mohammed Atcha
Deputy Designated Safeguarding Lead (DDSL)	Mr Imteyaz Omerji/Mr Ghulfam Khan
Prevent Lead	Mr Mohammed Atcha
CSE Lead	Mr Mohammed Atcha
Safeguarding Team Email	safeguarding@boltondarululoom.org.uk
Reviewed By	Dr Sohail Ahmed (Safeguarding Governor) Mr Luqman Amla (Principal)
Approved by	Governors & Trust Board

Review Period	1 Year or as and when required
Version	V2.0 – KCSIE 2026 update
Statutory Framework	Keeping Children Safe in Education 2026 (in force 1 September 2026); Working Together to Safeguard Children 2026; National Minimum Standards for Boarding Schools (May 2026); Education (Independent School Standards) Regulations 2014, Parts 3 to 5
Supersedes	V1 (KCSIE 2025). See Appendix 17 for the schedule of changes.
Scope	All pupils and students under 18, boarding and day, including students aged 16 and over. Section 34 applies to students aged 18 and over.
Date of Next Review	September 2027

SECTION 1 – INTRODUCTION7

SECTION 2 – PROCEDURES9

SECTION 3 – TRAINING10

SECTION 4 – RESPONSIBILITIES11

SECTION 5 – PROCEDURES FOR MANAGING CONCERNS13

SECTION 6 – SPECIFIC SAFEGUARDING ISSUES15

SECTION 6.1 – CHILDREN ABSENT FROM EDUCATION (CAE)15

SECTION 6.2 – CHILD SEXUAL EXPLOITATION (CSE) – SEE APPENDIX 216

SECTION 6.3 – SERIOUS VIOLENCE INCLUDING CHILD CRIMINAL EXPLOITATION – COUNTY LINES – SEE APPENDIX 816

SECTION 6.4 – DOMESTIC ABUSE – SEE APPENDIX 317

SECTION 6.5 – EXTREMISM AND RADICALISATION – SEE APPENDIX 717

SECTION 6.6 – HONOUR BASED VIOLENCE AND FEMALE GENITAL MUTILATION (FGM) – SEE APPENDIX 4 & APPENDIX 518

SECTION 6.7 – MODERN SLAVERY18

SECTION 6.8 – CHILD ON CHILD ABUSE (INCLUDING HARASSMENT AND VIOLENCE)18

SECTION 6.9 – UPSKIRTING21

SECTION 6.10 – CYBERCRIME21

SECTION 6.11 – CHILD ABDUCTION AND SAFETY INCIDENTS22

SECTION 6.12 – CHILDREN WITH FAMILY MEMBERS IN PRISON22

SECTION 7 – RACIST INCIDENTS25

SECTION 10.1 SUPPORTING CHILDREN27

SECTION 10.2 – LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN27

SECTION 10.3 – SPECIAL EDUCATIONAL NEEDS OR DISABILITY (SEND) / CERTAIN HEALTH CONDITIONS28

SECTION 10.4 – CHILDREN POTENTIALLY AT GREATER RISK OF HARM28

SECTION 11 – POSITIVE PHYSICAL INTERVENTION / USE OF REASONABLE FORCE29

SECTION 12 – RECORD KEEPING29

SECTION 13 – INFORMATION SHARING & CONFIDENTIALITY31

SECTION 14 – COMMUNICATION WITH PARENTS31

SECTION 15 – SUPPORTING AND SUPERVISION OF STAFF31

SECTION 16 – SAFER RECRUITMENT AND SELECTION OF STAFF32

SECTION 17 – ALLEGATIONS AGAINST STAFF34

SECTION 18 – ABUSE OF POSITION OF TRUST34

SECTION 20 – WHISTLEBLOWING (CONFIDENTIAL REPORTING)35

SECTION 23 – HEALTH & SAFETY36

SECTION 25 – PRIVATE FOSTERING ARRANGEMENTS37

SECTION 26 – CHALLENGE AND ESCALATION37

SECTION 28- HOMELESSNESS38

SECTION 29 – OTHER RELEVANT POLICIES38

SECTION 31 - INDIVIDUALS HIRING OUT THE SCHOOL PREMISES41

SECTION 32 – CONTEXTUALISED SAFEGUARDING41

SECTION 33 – SAFEGUARDING ARRANGEMENTS FOR BOARDERS42

APPENDIX 148

APPENDIX 1A – RECOGNITION & IDENTIFICATION OF ABUSE48

APPENDIX 1B – INDICATORS OF ABUSE48

APPENDIX 1C – EMOTIONAL ABUSE48

APPENDIX 1D – NEGLECT49

APPENDIX 1E – PHYSICAL ABUSE51

APPENDIX 1F – SEXUAL ABUSE52

APPENDIX 1G – SEXUAL ABUSE BY YOUNG PEOPLE54

APPENDIX 1H – ASSESSMENT54

APPENDIX 256

APPENDIX 2A – CHILD SEXUAL EXPLOITATION (CSE)56

APPENDIX 2B – WARNING SIGNS AND VULNERABILITIES CHECKLIST56

APPENDIX 357

APPENDIX 3A – EFFECTS OF DOMESTIC ABUSE ON CHILDREN AND YOUNG PEOPLE57

APPENDIX 3B – WHAT YOU MIGHT SEE IN SCHOOL58

APPENDIX 3C – WHAT SCHOOLS CAN DO59

APPENDIX 3D – OPERATION ENCOMPASS59

APPENDIX 461

APPENDIX 4A – FORCED MARRIAGE – A FORM OF DOMESTIC ABUSE AND A CRIME61

IN ENGLAND AND WALES61

APPENDIX 4B – WARNING SIGNS61

APPENDIX 4C – THE JUSTIFICATIONS61

APPENDIX 4D – CULTURE61

APPENDIX 4E – THE LAW61

APPENDIX 4F – WHAT TO DO IF A STUDENT SEEKS HELP62

APPENDIX 4G – WHAT TO DO IF THE STUDENT IS GOING ABROAD IMMINENTLY62

APPENDIX 4H – FORCED MARRIAGE: WHAT EDUCATORS SHOULD NOT DO:63

APPENDIX 563

APPENDIX 5A – FEMALE GENITAL MUTILATION (FGM) & BREAST IRONING – A FORM OF HUMAN RIGHTS ABUSE63

APPENDIX 5B – SIGNS, SYMPTOMS AND INDICATORS64

APPENDIX 5C – MANDATORY REPORTING DUTY65
APPENDIX 5D – WHAT IS BREAST IRONING?65
APPENDIX 5E – WHY DOES BREAST IRONING HAPPEN?65
APPENDIX 5F – BREAST IRONING IS PHYSICAL ABUSE65
APPENDIX 5G – BREAST IRONING IN THE UK66
APPENDIX 5H – WHAT SHOULD SCHOOLS DO?66
APPENDIX 5I – THE ‘ONE CHANCE’ RULE66
APPENDIX 6A – SHARING NUDES AND SEMI-NUDES (PREVIOUSLY KNOWN AS SEXTING)66
APPENDIX 6B – ACTION TO TAKE IN THE CASE OF AN INCIDENT69
APPENDIX 7A – RADICALISATION AND EXTREMISM & PREVENTING RADICALISATION72
APPENDIX 7B – WHAT IS PREVENT?72
APPENDIX 7C – WARNING SIGNS / INDICATORS OF CONCERN72
APPENDIX 7D – REFERRAL PROCESS73

APPENDIX 875

APPENDIX 8A – CRIMINAL EXPLOITATION – COUNTY LINES – WHAT IS COUNTY LINES?75
APPENDIX 8B – CRIMES ASSOCIATED WITH COUNTY LINES75
APPENDIX 8C – TERMS ASSOCIATED WITH COUNTY LINES76
APPENDIX 8D – WHAT TO DO IF YOU HAVE CONCERNS THAT A YOUNG PERSON IS INVOLVED IN COUNTY LINES76

APPENDIX 977

FORM 1: LOGGING A CONCERN ABOUT A CHILD’S SAFETY AND WELFARE – ALL STAFF AND VISITORS77

APPENDIX 1079

APPENDIX 10A – MALE BODY MAP79
APPENDIX 10B – FEMALE BODY MAP80

APPENDIX 1181

FORM 2: FRONT SHEET: CHILD PROTECTION / WELFARE CONCERNS RECORD81

APPENDIX 1283

FORM 3: CHECKLIST FOR HANDLING AND RECORDING ALLEGATIONS OR COMPLAINTS MADE AGAINST A MEMBER OF STAFF OR VOLUNTEER83

APPENDIX 1385

FORM 4: CHRONOLOGY – LOG OF INCIDENTS85

APPENDIX 1486

FORM 5: LOG OF CONCERNS REPORTED TO THE DESIGNATED SAFEGUARDING LEAD86

APPENDIX 1586

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD⁸⁷

APPENDIX 1687

BROOKS SEXUAL BEHAVIOURS TRAFFIC LIGHT TOOL⁸⁸

SECTION 1 – INTRODUCTION

- 1.1 This policy has been developed in accordance with the principles established by the Children Act 1989 and 2004, the Education Act 2002, and in line with government publications the Teachers' Standards 2012, 'Working Together to Safeguard Children' (2026) and 'Keeping Children Safe in Education' (KCSIE 2026), which came into force on 1 September 2026 and replaces KCSIE 2025.
- 1.2 AJI fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children.
- 1.3 Our policy outlines a ZERO Tolerance approach on all forms of ABUSE, AJI ensures all staff, trustees, governors and volunteers working in the school have an important role to play in preventing abuse.
- 1.4 There are five main elements to our policy:
 - Ensuring we practise safer recruitment in checking the suitability of staff and volunteers to work with children.
 - Raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
 - Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
 - Supporting pupils who have been identified as in need of early help or at risk of harm in accordance with his/her agreed Child Protection, Child in Need or Early Help plan.
 - Establishing a safe environment in which children can learn and develop.
- 1.5 We recognise that because of the day-to-day contact with children, school staff are well placed to identify concerns early and to observe the outward signs of abuse. The school will therefore:
 - Establish and maintain an environment where children feel safe, secure, valued and respected and are encouraged to talk, believing they will be listened to.
 - Ensure children know that there are adults in the school whom they can approach if they are worried.
 - Have regard to the DfE statutory guidance 'Relationships Education, Relationships and Sex Education (RSE) and Health Education' (July 2025 edition, in force from 1 September 2026), including its content on online harms, pornography, misogyny, sexual harassment, so-called 'incel' sub-cultures, artificial intelligence generated sexual imagery, coercive control and positive male role models by including opportunities in the curriculum, specifically through PSHE and ICT, for children to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help.
- 1.6 This policy is also written to meet the following legislative and regulatory framework, which applies to AJI as an independent boarding and day school:
 - Keeping Children Safe in Education 2026 (statutory guidance issued under section 175 of the Education Act 2002 and section 157 of the Education Act 2002 for independent schools), in force from 1 September 2026.
 - Working Together to Safeguard Children 2026, which replaced the 2023 edition from March 2026 and introduces the Family Help model, strengthened information sharing and multi-agency child protection arrangements.
 - The Children's Wellbeing and Schools Act 2026, which names education settings as relevant partners in local safeguarding arrangements, establishes multi-agency child protection teams, provides for a Single Unique Identifier for every child, and strengthens the regulation of independent educational institutions.
 - The Crime and Policing Act 2026, which creates a statutory duty to report child sexual abuse, a criminal offence of seeking to prevent such a report, and removes the supervision exemption from the definition of regulated activity.

- The Education (Independent School Standards) Regulations 2014, in particular Part 3 (welfare, health and safety of pupils), Part 4 (suitability of staff, supply staff and proprietors) and Part 5 (premises).
- The National Minimum Standards for Boarding Schools (May 2026 edition), issued under section 87C of the Children Act 1989, which apply to all boarders under 18 and to any boarder aged 18 or over who lives in the same accommodation as a pupil under 18.
- The Counter-Terrorism and Security Act 2015 (the Prevent duty), the Prevent Duty Guidance for England and Wales and the Channel Duty Guidance.
- The Equality Act 2010, the Human Rights Act 1998, the Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025.
- The Terrorism (Protection of Premises) Act 2025 (“Martyn’s Law”), under which the school is a standard tier premises.
- The Sexual Offences Act 2003 as amended by the Police, Crime, Sentencing and Courts Act 2022, which extends the abuse of position of trust offences to those who coach, teach, train, supervise or instruct children in a sport or a religion.

- 1.7 This policy applies to every person who works at, volunteers at, governs or visits AJI, including trustees and governors, teaching and non-teaching staff, boarding and residential staff, supply and agency staff, contractors, visiting scholars and speakers, examination invigilators, prefects and student monitors, and any person hiring or using the school premises. It applies during the school day, during all boarding time including evenings, nights, weekends and school holidays where boarders remain on site, on educational visits, and to online conduct and communication.
- 1.8 The school educates and accommodates pupils under 16 and students of 16 and over, including students who are, or become, 18 or over during their studies. Keeping Children Safe in Education applies to everyone under the age of 18. Section 34 of this policy sets out how the school manages the safeguarding of students aged 16 and over, the separation of adult students from pupils under 18, and the school’s responsibilities towards adults at risk.
- 1.9 KCSIE 2026 withdrew Annex A, the shortened summary of Part One that could previously be read by staff who do not work directly with children. From 1 September 2026 every member of staff at AJI, whether or not they work directly with children, must read and confirm that they have read and understood Part One of Keeping Children Safe in Education 2026 in full. This includes administrative, catering, cleaning, maintenance, transport, security and boarding support staff.
- 1.10 This policy is published on the school website and is available to parents on request, in accordance with Part 6 of the Independent School Standards. It is reviewed and approved by the governing body at least annually, and immediately following any significant safeguarding incident, change in statutory guidance or recommendation arising from an inspection, audit or local or national child safeguarding practice review.
- 1.6 We seek to ensure that the child’s wishes and feelings are considered when determining what action to take and what services to provide to protect children from harm. To this end we will:
- Ensure there are systems in place for children to express their views and give feedback e.g. through school/class councils, safety questionnaires, participation in anti-bullying and e-safety events.
 - Ensure that the child’s thoughts/wishes and feelings are sought and recorded on all referrals.

SECTION 2 – PROCEDURES

- 2.1 AJI will follow the Bolton Council Safeguarding Procedures as required and take account of guidance issued by the Department for Education (DfE).
- 2.2 The school will:
- Ensure it has a senior leader nominated as Designated Safeguarding Lead (DSL) who has received appropriate training and support for this role.
 - Ensure it has at least one member of staff who will act in the absence of the DSL (Deputy DSL).
 - Ensure it has a nominated Governor who will take leadership responsibility for the school's safeguarding arrangements.
 - Ensure every member of staff (including temporary and supply staff and volunteers) and the Board of Governors knows the name of the DSL and any deputies and understands their role.
 - Ensure that the DSL and/or a Deputy DSL is always available to speak to during school hours and has made adequate and appropriate cover arrangements for any out of hours/out of term time activities.
 - Staff should be vigilant in identifying early signs of need for intervention, particularly in cases of unexplained or persistent absences. Early help is crucial in promoting the welfare of children and preventing issues from escalating.
 - Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and neglect, including the specific issues of Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE), Children Missing Education (CME), Radicalisation and Extremism (Prevent), Serious Crime and Sexual Violence & Sexual Harassment, and maintain an attitude of 'it could happen here'.
 - Ensure all staff and volunteers understand their responsibility for referring any concerns to the DSL, Deputy DSLs or other members of the senior leadership team/safeguarding team in a timely manner and are aware that they may raise concerns directly with Children's Social Care Services if they believe their concerns have not been listened to or acted upon. KCSIE 2026 makes clear that a low-level concerns culture should be one where concerns are initially shared with the Designated Safeguarding Lead (DSL)/nominated person or directly with the head teacher/principal. The head teacher should ultimately be informed of all low-level concerns and make the final decision on how to respond. Where appropriate this can be done in consultation with the DSL. Guidance also clarifies that low level concerns which are shared about supply staff and contractors should be notified to their employers; and schools and colleges should consult with their LADO if unsure whether low-level concerns shared about a member of staff meet the harm threshold.
 - Ensure that parents understand the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus and providing its policy on the school website or available to parents on request.
 - Ensure that the duty of care towards its pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assisting staff to monitor their own standards and practice.
 - Ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines.
 - Be aware of and follow procedures set out by the DfE and the BSCB where an allegation of abuse is made against a member of staff or volunteer, including making a referral to the Local Authority Designated Officer (LADO).
 - Ensure that a referral is made to the DBS and/or the Teaching Regulation Agency if a person in regulated activity has been dismissed or suspended or removed from regulated activity where the harm criteria is met or would have been had they not resigned.
 - Operate safer recruitment practice, ensuring that at least one member on every recruitment panel has completed safer recruitment training.

- Ensure that all staff understand the statutory duty to report child sexual abuse introduced by the Crime and Policing Act 2026, and that staff who fail to comply may be referred to the Disclosure and Barring Service (DBS) for consideration of their suitability to work with children.
 - Ensure that all staff understand that it is a criminal offence, punishable by up to seven years' imprisonment, for any person to engage in conduct intended to prevent a report being made under the mandatory reporting duty.
 - Ensure the school engages effectively with the local safeguarding partners. Under the Children's Wellbeing and Schools Act 2026 education settings are named as relevant partners in local safeguarding arrangements and must co-operate with the safeguarding partners and with any multi-agency child protection team.
 - Ensure the school understands and uses the Family Help model introduced by Working Together to Safeguard Children 2026, which merges targeted early help and section 17 child in need support into a single, co-ordinated offer, and that referrals are made at the right level of need rather than delayed.
 - Ensure appropriate filtering and monitoring systems are in place across all school and boarding provision, that their effectiveness is reviewed at least once every academic year, that the review is led by the identified member of the senior leadership team with support from the DSL and the school's IT provider, and that the review and any resulting actions are recorded.
 - Ensure the school operates as a mobile phone free environment for pupils during the school day, and that the separate arrangements governing boarders' devices during boarding time are set out in the Mobile Phone and Personal Devices Policy and applied consistently.
 - Ensure that any concern about a child using or carrying a weapon, or expressing an intention to do so, is reported to the DSL immediately for risk assessment and, where necessary, referral to the police and children's social care.
 - Ensure that safeguarding arrangements extend to any individual or organisation hiring or otherwise using the school premises, and that allegations relating to those individuals or organisations are handled in accordance with Section 31 of this policy.
 - Ensure that the school's response to safeguarding concerns is recorded and monitored so that the governing body can evidence an open and positive safeguarding culture, which is a key line of enquiry at inspection.
- 2.3 Our procedures will be regularly reviewed and updated at least annually unless an incident or new legislation or guidance requires the need for an interim review. We recognise the expertise our staff builds by undertaking safeguarding training and managing safeguarding concerns on a daily basis. We therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements.

SECTION 3 – TRAINING

- 3.1 When staff join our school, they will be informed of the safeguarding child's arrangements in place. They will be given a copy of this policy including its Appendices and the school's safeguarding response to children who go missing from education, the pupil behaviour policy, Part One of Keeping Children Safe in Education 2026 in full, the school's Code of Conduct, the Mobile Phone and Personal Devices Policy, the Online Safety and Acceptable Use Policy, and told who the DSL is, who acts in their absence and what this role includes. Staff sign to confirm that they have read and understood these documents, and the record is retained by the school. Because Annex A of KCSIE was withdrawn in the 2026 edition, this requirement applies to all staff, including those who do not work directly with children.
- 3.2 All staff will receive induction in safeguarding children. The induction programme will include basic child protection information relating to signs and symptoms of abuse, how to manage a disclosure from a child, when and how to record a concern about the welfare of a child and advice on safe working practice.

- 3.3 All volunteers, supply staff and regular visitors to our school will be told where our policy is kept, given the name of the DSL and Deputy DSL's and informed of the school's procedures in reporting concerns.
- 3.4 All staff will receive training in child protection and safe working practice, updated at least every three years, in line with the BSCB. Training will include signs and symptoms of abuse and neglect, as well as specific safeguarding issues, such as CSE, FGM, Prevent, serious crime, online safety and child on child abuse, including sexting and sexual violence and sexual harassment. Training will also include how to record and report abuse both within school and to Children's Social Care.
- 3.5 In addition, staff will receive safeguarding and child protection updates from the DSL as required, but at least annually.
- 3.6 Staff with specific responsibility for safeguarding children will undertake both single and interagency training at a level suitable to their role and responsibilities, updated every two years. In addition to formal training, the DSL and Deputy DSL's will update their knowledge and skills via the BSCB support and communications, at least annually.
- 3.7 Staff with leadership responsibilities will undertake further relevant training in safeguarding related issues such as CSE, FGM, Radicalisation (WRAP training), Sexual Violence and Sexual Harassment, Management of Allegations of Abuse and cascade the learning from this training to the rest of the staff.
- 3.8 All staff training will, from September 2026, additionally cover: the statutory duty to report child sexual abuse under the Crime and Policing Act 2026; violence against women and girls, misogyny and misandry; serious violence, weapons and child criminal exploitation; mental health as a safeguarding issue and when to escalate to emergency services; the identification of young carers; artificial intelligence, deepfakes, nudification tools and the sharing of indecent and semi-indecent images however generated; the school's filtering and monitoring arrangements and how to escalate a concern; and the safeguarding risks that are specific to a residential setting.
- 3.9 All boarding and residential staff, including staff who sleep in or are on call in boarding accommodation, receive additional induction and training in the management and practice of boarding, in line with National Minimum Standard 2.6 and 20.1. This covers night supervision, missing boarder procedures, child on child abuse in shared overnight accommodation, personal care and privacy, the boundaries applying to staff accommodation, and the school's policy on searching, screening and confiscation.
- 3.10 Trustees, governors and the proprietor body receive safeguarding and child protection training at induction and at regular intervals thereafter, including training on their strategic responsibilities for filtering and monitoring, safer recruitment, the management of allegations, and their duty to challenge and escalate.
- 3.11 The school maintains a central record of all safeguarding training, including dates, content, attendance and the training provider, so that gaps are identified and addressed promptly and so that compliance can be evidenced at inspection.
- 3.12 Any person who hires or otherwise uses the school premises, and any visiting scholar, speaker or contractor who will have contact with pupils, is briefed on the school's safeguarding arrangements and on how to report a concern, before that contact begins.

SECTION 4 – RESPONSIBILITIES

- 4.1 The Board of Governors' will nominate a member to take leadership responsibility for safeguarding children who will liaise with the DSL and or Head teacher in matters relating to safeguarding. It will ensure that:

- The DSL takes lead responsibility for safeguarding and child protection and does not delegate this responsibility.
- Safeguarding Policies and procedures are in place, available to parents on the school website or by other means and reviewed at least annually.
- Safeguarding responses are put in place in cases where children go missing from education.
- Mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education.
- Termly reports on the effectiveness of the school's safeguarding procedures are presented to the trust board.
- Any weaknesses brought to its attention relating to safeguarding are remedied without delay.
- It complies with all legislative duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism.
- All staff, including those who do not work directly with children, read Part One of Keeping Children Safe in Education 2026 in full, and that mechanisms are in place to confirm and record this.
- An identified member of the senior leadership team holds strategic responsibility for filtering and monitoring, that the effectiveness of those systems is reviewed at least once every academic year across all internet connected devices and all relevant locations including boarding accommodation, and that the review is recorded.
- The school has an effective mobile phone policy and that its operation is monitored.
- The DSL has sufficient time, funding, training, resources and supervision to carry out the role, including for the additional demands created by a residential setting.
- The school co-operates with the local safeguarding partners as a relevant partner under the Children's Wellbeing and Schools Act 2026, and contributes to local and national child safeguarding practice reviews.
- The school's safeguarding arrangements are audited annually against Keeping Children Safe in Education, the National Minimum Standards for Boarding Schools and Part 3 of the Independent School Standards, with the outcome and action plan reported to the full governing body.

4.2 The Head teacher will ensure that:

- The Safeguarding policies and procedures are fully implemented and followed by all staff.
- Sufficient funding, support, time and resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to child protection.
- All staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedures.
- All allegations of abuse against staff are reported to the LADO in a timely manner.

4.3 The DSL will coordinate action on safeguarding and promoting the welfare of children within the school setting. The DSL is responsible for:

- Organising child protection induction training for all newly appointed staff, whole staff training, refreshed at least every 3 years with annual updates as required.
- Providing a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education.
- Making use of the Levels of Need Guidance when deciding about whether or not the threshold for Early Help or Children's Social Care intervention is met.
- Referring a child to Social Care, when there are concerns about possible abuse and neglect.
- Referring a child to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups.
- Liaising with the head teacher to ensure he/she is informed of all child protection issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaising with other staff (for example pastoral support staff, school nurses or IT technicians or e-safety coordinators) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

- Keeping written records of concerns about children, including the use of body maps, even where there is no need to refer the matter immediately.
- Ensuring all child protection records are kept securely, separate from the main pupil file, and in locked / password protected locations.
- Ensuring that all child protection files are transferred in a safe and timely manner when a child moves settings, both between and across phases, within and out of the county and that a receipt of transfer is obtained.
- Notifying the key worker if there is an unexplained absence of more than two days of a pupil who is subject to a child protection plan.
- Schools should investigate cases of unexplainable and/or persistent absences from education. This approach focuses on understanding the underlying causes rather than assigning blame to the child.
- Developing effective links with relevant agencies and other professionals and co-operating as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings.
- Contributing to assessments and providing a report to initial and review conferences, if requested, which has been shared with parents first, whenever possible.
- Coordinating a programme of safety, health and well-being through the curriculum, including issues of protective behaviours, healthy relationships, staying safe on-line, and the promotion of Fundamental British Values.
- Act as a source of support, advice and expertise for all staff.
- Understanding and discharging the school's obligations under the statutory duty to report child sexual abuse, including making a report to the police or the local authority as soon as is practicable where the duty is triggered.
- Understanding the school's filtering and monitoring systems and processes, contributing to the annual effectiveness review, and acting on any concern escalated through monitoring.
- Considering, in every case, whether the concern relates to harm inside the family, harm outside the family, or online harm, and recording that analysis, in line with Working Together to Safeguard Children 2026.
- Maintaining an overview of safeguarding in boarding, including missing boarder incidents, night time concerns, patterns in boarders' complaints and the outcomes of boarders' surveys.
- Acting as the school's Prevent lead or working directly with the named Prevent lead, maintaining the Prevent risk assessment and making Prevent referrals through the agreed local pathway.
- Carrying out the role set out in Annex B of Keeping Children Safe in Education 2026, previously Annex C.

SECTION 5 – PROCEDURES FOR MANAGING CONCERNS

- 5.1 Our school adheres to child protection procedures that have been agreed locally through the Bolton Safeguarding Board. Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the BSCB.
- 5.2 Every member of staff, including volunteers working with children at our school, is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy. They should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe.
- 5.3 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these

circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

- 5.4 It is not the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.
- 5.5 The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our school. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the Deputy Designated Safeguarding Lead. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff or Children's Social Care.
- 5.6 All concerns about a child or young person should be reported without delay and recorded in writing using the agreed template (*See Appendix 9*).
- 5.7 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children's Services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.
- 5.8 All referrals will be made in line with local procedures as detailed on the BSCB.
- 5.9 If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children's Services immediately. Anybody can make a referral. If the child's situation does not appear to be improving, the staff member with concerns should press for reconsideration by raising concerns again with the DSL and/or the Head teacher. Concerns should always lead to help for the child at some point.
- 5.10 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the police if:
 - The situation is an emergency and the designated senior person, their deputy and the Head teacher are all unavailable.
 - They are convinced that a direct report is the only way to ensure the pupil's safety.
- 5.11 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Head teacher or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Children's Services directly with their concerns.

Mandatory reporting of child sexual abuse

- 5.12 The Crime and Policing Act 2026 creates a statutory duty on anyone undertaking regulated activity with children in England to report child sexual abuse. At AJI this applies to all staff, to volunteers, and to any other person carrying out relevant activity with our pupils.
- 5.13 The duty is triggered where a person, in the course of their work or volunteering, is told by a child that they are being or have been sexually abused, is told by a person that they have sexually abused a child, or personally witnesses a child being sexually abused. Where the duty is triggered, a report must be made to the police or to the local authority as soon as is reasonably practicable.
- 5.14 A member of staff at AJI discharges the duty by reporting immediately to the DSL, who will make the external report without delay and record the fact, time and content of that report. Reporting to the DSL does not remove the individual's responsibility to satisfy themselves that a report has been made. If a member of staff has any doubt that an external report has been made, they must make the report themselves and inform the Head teacher.

- 5.15 Failure to comply with the duty is an example of behaviour that may lead to inclusion on the children's barred list, and the school will make a referral to the DBS where appropriate. It is a criminal offence, punishable by up to seven years' imprisonment, for any person to engage in conduct intended to prevent a report being made. No member of staff will be discouraged, delayed or penalised for making a report. Cultural sensitivity, reputational concern, the standing of the person alleged to have caused harm, and the wish to deal with a matter internally or within the community are never reasons to delay or withhold a report.
- 5.16 The mandatory reporting duty sits alongside, and does not replace, the wider duty on all staff to refer any safeguarding concern to the DSL, including concerns falling short of the trigger for the statutory duty. Suspicion of abuse, and information received second hand, must always be reported internally even where the statutory duty is not engaged.

SECTION 6 – SPECIFIC SAFEGUARDING ISSUES

SECTION 6.1 – CHILDREN ABSENT FROM EDUCATION (CAE)

We recognise that a child going missing from education is a potential indicator of abuse or neglect. Our procedures for dealing with children that are absent from education are based on the Local Authority and BSCB. Staff are made aware of these procedures at induction and through our Attendance Policy. We will make every attempt to obtain more than one emergency contact number for each child registered at the school to ensure we are able to contact a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

We will ensure that we inform the relevant local authority when removing a child from the school roll at standard and non-standard transition points in line with the DfE guidance on Children absent from Education. The school **must work with children's services** where absence raises safeguarding concerns, in line with the statutory *Working Together to Improve School Attendance* guidance.

We will ensure that we follow these procedures for dealing with children that are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. We will ensure that we report children absent from education to the LA CAE officer, in line with statutory requirements.

Keeping Children Safe in Education 2026 clarifies that being absent from education, as well as missing from education, can be a warning sign of a range of safeguarding concerns, including neglect, sexual abuse, sexual exploitation, child criminal exploitation, forced marriage, so-called 'honour' based abuse and travel abroad for the purpose of harm. The DSL will therefore review absence data at least fortnightly alongside safeguarding records, and will treat unexplained, unusual or repeated absence as a potential safeguarding indicator rather than solely an attendance matter.

Where a pupil is withdrawn from the school roll, the school will notify the local authority in accordance with the Education (Pupil Registration) (England) Regulations and will not remove a pupil from roll until it has satisfied itself, so far as it is able, that the pupil has a confirmed onward destination. Particular care is taken where a pupil is said to be moving abroad, moving to another faith setting, moving to an unregistered setting, or moving to elective home education. Under the Children's Wellbeing and Schools Act 2026, local authorities are establishing registers of children not in school, and the school will co-operate fully with any request for information relating to those registers.

Boarders present specific risks in this area. Where a boarder does not return to school after a holiday or exeat, does not travel as expected, or cannot be accounted for, the school will treat this as a potential

safeguarding concern from the outset and will follow the missing boarder procedure at Section 33 as well as its children absent from education procedures.

SECTION 6.2 – CHILD SEXUAL EXPLOITATION (CSE) – SEE APPENDIX 2

We recognise that CSE is a form of child sexual abuse involving criminal behaviours against children and young people which can have a long-lasting adverse impact on a child's physical and emotional health. Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people. Victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. It may also be linked to child trafficking.

The school addresses the risks of sexual exploitation. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially present what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff, volunteers and trustees/governors are made aware of the indicators of sexual exploitation, the fact that the victim may have been sexually exploited even if the sexual activity appears consensual and that it does not always involve physical contact but can occur through the use of technology. All concerns of child sexual exploitation are reported immediately to the DSL.

SECTION 6.3 – SERIOUS VIOLENCE INCLUDING CHILD CRIMINAL EXPLOITATION – COUNTY LINES – SEE APPENDIX 8

This is where children and young people are being exploited and drawn into drug related activity by criminal gangs, groups or individuals. Typically, the gang exploits young or vulnerable people to store and/or supply drugs, move cash and to secure the use of homes belonging to vulnerable adults. There is a crossover between CSE and County Lines and young people are sometimes required to offer sex in order to pay off perceived debts. Concerns about young people being possibly involved should be passed to the DSL who will refer to Police and the Social services.

Keeping Children Safe in Education 2026 substantially strengthens the expectations on schools in relation to serious violence. All staff must be aware of the indicators that a child may be at risk of, or involved in, serious violence. These include increased absence from school, a change in friendship group or relationships with older individuals or groups, a significant decline in performance, signs of self harm or a significant change in wellbeing, signs of assault or unexplained injuries, and unexplained gifts, money or new possessions, which may indicate that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs.

Any concern that a child is using or carrying a weapon, has access to a weapon, or has expressed an intention to use or carry a weapon, must be reported to the DSL immediately. The DSL will assess the risk and take appropriate action, which may include an immediate referral to the police and to children's social care, a risk assessment covering the child concerned and other pupils, and consideration of the school's searching, screening and confiscation powers under section 550ZA of the Education Act 1996 and the DfE guidance on searching, screening and confiscation. Searching and screening of boarders and their possessions will be carried out in accordance with that guidance and National Minimum Standard 15.1.

Risk factors for serious violence are considered as part of the school's contextual safeguarding work at Section 32, and information is shared with the police and local partners in accordance with the Serious Violence Duty and local information sharing arrangements.

SECTION 6.4 – DOMESTIC ABUSE – SEE APPENDIX 3

We recognise that exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships as well as in the context of their home life. We will ensure that our pupils are educated to ensure they understand what a healthy relationship looks like, for example by using the whole school approach and resources from the BMC website.

[bolton-domestic-abuse-handbook-2017 \(boltonsafeguardingchildren.org.uk\)](https://www.boltonsafeguardingchildren.org.uk/bolton-domestic-abuse-handbook-2017)

All concerns regarding Domestic Abuse will be reported to the DSL, who will ensure that appropriate support is available to the young people and make referrals to the Social Services where the threshold for social care intervention is met.

SECTION 6.5 – EXTREMISM AND RADICALISATION – SEE APPENDIX 7

We recognise that children are vulnerable to extremist ideology and radicalisation. We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. We will ensure that:

- Through training, staff, volunteers and trustees understand what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
- The DSL has received Prevent training and will act as the point of contact within our school for any concerns relating to radicalisation and extremism.
- The DSL will make referrals in accordance with BSCB and will represent our school at Channel Meetings as required.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils. We encourage pupils to respect the Fundamental British Values of Democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.
- We will use relevant information, tools and resources to help our staff and parents recognise and address extremism and radicalisation in young people, for example The Educate Against Hate website.

The school discharges the Prevent duty under section 26 of the Counter-Terrorism and Security Act 2015 in accordance with the current Prevent Duty Guidance for England and Wales and the Channel Duty Guidance. Prevent is a safeguarding duty. It is not a surveillance function, it is not directed at any one faith or community, and it applies equally to Islamist extremism, extreme right wing extremism, and any other ideology or mixed, unstable or unclear ideology that risks drawing a young person into terrorism or into support for terrorism.

The school maintains a written Prevent risk assessment, reviewed at least annually and after any relevant incident, which considers the risks arising from its curriculum, its residential provision, its use of external speakers and visiting scholars, its online estate, the wider community context and the vulnerability profile of its students. The risk assessment informs the school's Prevent action plan and training programme.

All external speakers, visiting scholars and organisations invited to address students are subject to prior approval by a senior leader. Approval includes verification of identity, due diligence on the individual and any organisation they represent, agreement to the school's expectations on content, and arrangements for a member of staff to be present throughout. The school reserves the right to decline, curtail or terminate

any address. The same due diligence applies to materials, publications and online content used in teaching, including material used in religious instruction.

Where a member of staff has a concern that a student may be vulnerable to radicalisation, they must report it to the DSL or Prevent lead in the same way as any other safeguarding concern. The DSL will consider whether a Prevent referral is appropriate, will make the referral through the agreed local pathway, and will contribute to any Channel panel. A Prevent referral is a request for support, and consent is sought for Channel intervention, which is voluntary. Where there is an immediate risk to life, the police will be contacted without delay.

Staff should be alert to the fact that vulnerability to radicalisation frequently coexists with other safeguarding concerns such as isolation, bereavement, family breakdown, bullying, identity conflict, unmet special educational needs or mental ill health, and should consider the whole picture rather than any single factor. Staff should also be alert to online radicalisation, including through gaming platforms, encrypted messaging, algorithmic content feeds and artificial intelligence generated material.

SECTION 6.6 – HONOUR BASED VIOLENCE AND FEMALE GENITAL MUTILATION (FGM) – SEE APPENDIX 4 & APPENDIX 5

We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so called ‘Honour-Based’ Violence (HBV) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBV, they should inform the DSL who will activate local safeguarding procedures using existing, national and local protocols for multi-agency liaison with police and children’s social care.

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers (persons employed or engaged to carry out teaching work). Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: *‘Mandatory Reporting of Female Genital Mutilation – procedural information’ (October 2015)*. Although all students at AJI are male, we will still provide staff with full training on FGM.

SECTION 6.7 – MODERN SLAVERY

The Modern Slavery Act 2015 places a new statutory duty on public authorities, including schools, to notify the *National Crime Agency (NCA)* (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority (including schools) bears this obligation where it has ‘reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking’. Staff need to be aware of this duty and inform the DSL should they suspect or receive information that either parents or their children may be victims of modern slavery. The DSL will then contact the NCA.

SECTION 6.8 – CHILD ON CHILD ABUSE (INCLUDING HARASSMENT AND VIOLENCE)

Part Five of KCSIE 2026 was rewritten and now covers child on child sexual violence and sexual harassment as a continuum, running from harmful sexual behaviour and sexualised language through to sexual harassment and sexual violence. Behaviour at the lower end of that continuum is not trivial and must not be dismissed, because it normalises and enables what follows. KCSIE 2026 also incorporates the Department for Education's advice on sexual violence and sexual harassment between children in schools and colleges directly into the guidance.

The guidance notes (page 104) 'how schools and colleges should respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and/or online (what to look out for and indicators of abuse are set out in Part one). As set out in Part one of the guidance, all staff working with children are advised to maintain an attitude of 'it could happen here', and this is especially important when considering child-on-child abuse'.

[Keeping children safe in education 2025](#) – Full document

Part One for all staff to have access to and have available

We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. This is most likely to include, but not limited to: bullying (including cyber bullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence (such as rape, assault by penetration and sexual assault) and sexual harassment (such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse); up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; sexting (also known as youth produced sexual imagery –

See Appendix 6); and initiation/hazing type violence and rituals. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children's procedures will apply in respect of any child who is suffering or likely to suffer significant harm. Staff must never tolerate or dismiss concerns relating to child-on-child abuse, must not pass it off as 'banter', 'just having a laugh' or 'part of growing up'.

We will ensure, through training, that staff, volunteers and trustees/governors will understand the range of child-on-child abuse, including sexual violence and sexual harassment, and will be made aware of how to recognise and manage such issues. Staff will be given the skills to identify and manage harmful sexual behaviour using resources such as the Brook Traffic Light Tool, (*See Appendix 16*). Staff should be aware that some groups are potentially more at risk, for example girls, children with SEND and LGBT children. KCSIE 2026 highlights the significance of the Equality Act 2010 to school safeguarding, including that schools and colleges:

- must not unlawfully discriminate against pupils because of their protected characteristics
- must consider how they are supporting pupils with protected characteristics
- must take positive action, where proportionate, to deal with the disadvantages these pupils face.

For example, by making reasonable adjustments for disabled children and supporting pupils if there is evidence they are being disproportionately subjected to sexual violence or harassment and provides guidance on the importance of providing LGBTQ+ children with a safe space for them to speak out or share their concerns with members of staff.

Staff should be aware that such incidents and/or behaviours can be associated with factors outside the school and can occur between children outside the school. Staff, and particularly the DSL, should always consider the context in which such incidents and/or behaviours occur – this is known as 'contextual safeguarding.'

Where the abuse is physical, verbal, bullying or cyber-bullying, recording of such incidents and sanctions will be applied in line with our Behaviour and Anti-Bullying policies. Where a child discloses safeguarding allegations of a sexual nature against another pupil in the same setting, the DSL should refer to the Bolton Council Safeguarding Children Procedures Website and seek advice from the Social Services or Community

Social Worker before commencing its own investigation or contacting parents. This may mean, on occasions, that the school is unable to conduct its own investigation into such incidents. All such incidents will be recorded using our child protection recording forms.

Support for the victims of abuse will be in line with support outlined in the School's Behaviour and Anti-Bullying policies. For victims of sexual abuse, the school should follow advice given by Children's Social Care and consider using external agencies, such as Early Help or Greater Manchester Rape and Sexual Abuse Support Centre to support any strategies that they may be able to provide within school.

Depending on the nature of abuse, the school may need to consider providing measures to protect and support the victim, the alleged perpetrator and other pupils and/or staff in the school by means of a risk assessment. The risk assessment should be recorded and kept under review.

Additional expectations introduced by KCSIE 2026

Child on child abuse is a safeguarding issue for both the child who is the victim and the child who is alleged to have caused the harm, and both require a safeguarding response and support. The school will never treat the alleged perpetrator solely as a behaviour matter.

KCSIE 2026 recognises that in some, though not all, forms of child on child abuse it is more likely that girls will be victims and boys perpetrators, and that misogyny is a driver of harmful behaviour. All child on child abuse is unacceptable, whoever the victim and whoever the perpetrator, and misandry is equally unacceptable. As a boys' school, AJI accepts a particular responsibility to challenge misogynistic language, attitudes and online influences among its students, to teach respectful relationships explicitly, and to treat the normalisation of degrading language about women and girls as a safeguarding concern rather than as banter.

The forms of child on child abuse that staff must be alert to include: physical assault and harm, or the threat of harm, including with a weapon; harmful sexual behaviour, sexual violence and sexual harassment; initiation, hazing and ritual violence; upskirting and cyberflashing; abuse within intimate relationships between children; and the consensual and non-consensual sharing of self generated intimate images or videos, including images that have been digitally altered or wholly generated using artificial intelligence, sometimes described as deepfakes or produced by nudification tools.

All incidents involving the sharing of indecent or semi-indecent images of children require a safeguarding response, whether the sharing was consensual or non-consensual, and whether the image is real, altered or artificially generated. Staff must never view, copy, print, share, store or ask a child to share such an image, and must follow the procedure at Appendix 6.

Where a child or a parent raises a concern about child on child abuse, the school will acknowledge it promptly, take it seriously, keep the child and, where appropriate, the parents informed of what is being done, and never treat a report as a nuisance or as a matter of the child's own making. The school will not use non-disclosure or confidentiality agreements to prevent a child or parent from raising a safeguarding concern with any person or authority.

In a boarding setting, victims and alleged perpetrators may continue to share accommodation, dining, prayer and study spaces. The DSL will therefore complete a written risk assessment for every case, covering sleeping arrangements, supervision, movement around the site, and the support offered to each child, and will keep that risk assessment under active review. Separating a victim from their peer group or their normal routine as a means of managing risk will be avoided wherever possible, and the burden of change should not fall on the victim.

SECTION 6.9 – UPSKIRTING

‘Up skirting’ which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

The Criminal Prosecution Service (CPS) defines ‘up skirting’ as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person’s clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.”

The Online Safety Act 2023 also created the offence of cyberflashing, which is the sending or giving of a photograph or film of genitals with the intention of causing alarm, distress or humiliation, or for the purpose of sexual gratification while being reckless as to whether alarm, distress or humiliation is caused. The Act further criminalised the sharing, and threatening to share, intimate images without consent, including images that have been digitally altered or artificially generated. Staff must treat any report of upskirting, cyberflashing or non-consensual image sharing as a safeguarding concern and report it to the DSL immediately.

SECTION 6.10 – CYBERCRIME

KCSIE 2026 requires governing bodies, trustees and proprietors to review the effectiveness of the school’s filtering and monitoring systems at least once every academic year, and to record that review. They should ensure that the leadership team and relevant staff are:

- aware of and understand the systems in place
- manage them effectively
- know how to escalate concerns when identified.

Schools and colleges should use communications with parents and carers to reinforce the importance of children being safe online. Schools should share information with parents/carers about:

- what systems they have in place to filter and monitor online use
- what they are asking children to do online, including the sites they will ask to access
- who from the school or college (if anyone) their child is going to be interacting with online

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

- Unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded
- Denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- Making, supplying or obtaining malware (Malicious Software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

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

If staff have any concerns about a student in this area, please inform the DSL or DDSL, who should then consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency (NCA). Working with regional and local policing. It

aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety

SECTION 6.11 – CHILD ABDUCTION AND SAFETY INCIDENTS

Child Abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child Abduction can be committed by parents or other family members; by people known but not released to the victim (such as neighbours, friends and acquaintances; and by strangers

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As Children get older and are granted more independence (for example, they go shopping on their own) it is important we provide practical advice on how to keep themselves safe. As a school we provide outdoor safety lessons run by teachers or by local police staff. Lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

SECTION 6.12 – CHILDREN WITH FAMILY MEMBERS IN PRISON

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

SECTION 6.13 – VIOLENCE AGAINST WOMEN AND GIRLS (VAWG) AND MISOGYNY

KCSIE 2026 introduces expanded content on violence against women and girls, reflecting national policy and the findings of the Casey Audit. Violence against women and girls is an umbrella term covering rape and other sexual offences, sexual harassment, domestic abuse, stalking, so-called 'honour' based abuse including forced marriage and female genital mutilation, the sharing of intimate images without consent, and the online abuse and harassment of women and girls.

The school recognises that these behaviours are frequently rehearsed and normalised in adolescence, and that education settings are one of the few places where that pattern can be interrupted. All staff receive training on the indicators of VAWG, on misogyny and on the influence of online sub-cultures, including so-called 'incel' content, manosphere influencers and algorithmically promoted material that presents women as inferior or as objects.

The school addresses these issues through its curriculum, its pastoral and boarding programme, its assemblies and its religious instruction, teaching explicitly that the dignity, safety and equal worth of women and girls are non-negotiable, and that no cultural, familial or religious justification can excuse abuse. Staff who hear misogynistic language, jokes or content will challenge it, record it, and report patterns to the DSL.

Concerns that a student is at risk of perpetrating, or has perpetrated, any form of violence against women and girls will be treated as a safeguarding matter for that student as well as for any victim, and will be

referred to the DSL for risk assessment and, where appropriate, referral to children's social care and the police.

SECTION 6.14 – MENTAL HEALTH AS A SAFEGUARDING ISSUE

KCSIE 2026 substantially expands its content on mental health. All staff must understand that mental health concerns can be an indicator of abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis, but staff are well placed to observe changes in behaviour, mood, presentation, appetite, sleep, engagement and relationships that may indicate a child is experiencing a mental health problem, or is at risk of harm.

Where a member of staff has a mental health concern about a child that is also a safeguarding concern, they must report it to the DSL immediately. Where a member of staff believes a child is in danger, they must call 999 or take the child to an accident and emergency department immediately, and must call 111 where the situation is not an emergency. Staff must not delay urgent action in order to locate the DSL, although the DSL must be informed as soon as possible afterwards.

The school recognises that boarders may be separated from family support networks, may face additional pressures arising from an intensive religious and academic curriculum, and may be reluctant to disclose distress for fear of disappointing family or community expectations. Boarding staff receive specific training on recognising and responding to distress in a residential setting, and the school ensures that boarders can access confidential support, including through the independent person, external helplines, the school nurse or medical provision, and, with consent, local NHS mental health services.

The school will not treat mental ill health as a disciplinary matter, and behaviour that may be a symptom of distress will be considered through a safeguarding and pastoral lens before any sanction is applied.

SECTION 6.15 – YOUNG CARERS

KCSIE 2026 adds new content on young carers. A young carer is a child who provides regular care and emotional support to a family member who is physically or mentally unwell, disabled, or misusing substances. Caring responsibilities can affect attendance, punctuality, homework completion, participation, friendships, sleep and health, and can mask neglect or a level of family need that requires support.

Staff who suspect a student has caring responsibilities should report this to the DSL, who will consider whether an assessment or a referral to Family Help is appropriate, and what practical adjustments the school can make. The school recognises that pupils and boarders returning home at weekends or during holidays may carry substantial caring responsibilities that are invisible during term time.

SECTION 6.16 – SAFEGUARDING CHILDREN WITH MEDICAL CONDITIONS

KCSIE 2026 adds new content on safeguarding children with medical conditions. Children with long term or complex medical conditions may face additional safeguarding risks, including assumptions that indicators of abuse relate to their condition, dependence on adults for personal or intimate care, isolation from peers, and the possibility of medical neglect or fabricated or induced illness.

The school implements the DfE advice on supporting pupils at school with medical conditions and, for boarders, National Minimum Standard 7, including written arrangements for first aid, chronic conditions and disabilities, medical emergencies, and the use of prescription and non-prescription medication

including controlled drugs. All medication is stored securely and its administration recorded. Boarders assessed as sufficiently responsible may self-medicate, following a documented risk assessment.

Any intimate or personal care is provided in accordance with a written care plan agreed with the child, the parents and, where relevant, health professionals, is delivered by named staff, and is recorded. Staff will not carry out intimate care outside those arrangements. Failure to obtain medical or dental treatment for a child, persistent non-collection of prescribed medication, or a refusal to allow a child to access health services, will be treated as a potential neglect concern.

Boarders' confidentiality, privacy and dignity as patients are protected, including the right of a boarder assessed as Gillick competent to give or withhold consent for their own treatment, and the presumption that a young person aged 16 or over has capacity to consent to their own medical treatment.

SECTION 6.17 – SPORT, PHYSICAL ACTIVITY AND ONE-TO-ONE INSTRUCTION

KCSIE 2026 adds new content on safeguarding in sport. The school applies the same safeguarding standards to sport, physical activity, coaching and one-to-one instruction as it does to classroom teaching. This includes safer recruitment checks on coaches and instructors, whether employed, contracted or volunteering, clear expectations about physical contact, changing and showering arrangements that protect privacy, and the requirement that one-to-one coaching takes place in a visible or supervised setting.

The same principles apply to one-to-one religious instruction, including individual Qur'an recitation and memorisation sessions. These sessions must take place in rooms that are visible from a corridor or communal area, with a door open or a vision panel unobstructed, during known and recorded times, and must not take place in staff accommodation or in any private area. Timetables for one-to-one instruction are held centrally and are open to scrutiny by the DSL and senior leaders.

The abuse of position of trust offences in the Sexual Offences Act 2003, as amended by the Police, Crime, Sentencing and Courts Act 2022, apply expressly to any person who coaches, teaches, trains, supervises or instructs a child in a sport or a religion. All staff and volunteers who teach or supervise students in religious study are therefore in a position of trust in law, and any sexual activity with a student under 18 is a criminal offence regardless of the age of consent. This is explained to all staff at induction and is set out in the Staff Code of Conduct.

SECTION 6.18 – ARTIFICIAL INTELLIGENCE, DEEPFAKES AND NUDIFICATION TOOLS

KCSIE 2026 introduces guidance on the safe and effective use of generative artificial intelligence in education, and makes clear that indecent and semi-indecent images may be digitally altered or wholly generated using artificial intelligence, including images sometimes described as deepfakes.

The school recognises the following artificial intelligence related risks: the creation or sharing of sexual images of a real child using nudification or face swap tools, which is a criminal offence and a serious child protection matter; the use of artificial intelligence to produce bullying, harassing or degrading content about a student or member of staff; the generation of extremist, self harm or other harmful content that bypasses filtering; artificial intelligence chatbots and companion applications that may groom, sexualise or emotionally exploit a child, or provide dangerous advice; and the erosion of a child's ability to distinguish authentic from synthetic content.

Any artificial intelligence tool used by the school or made available to students must meet the Department for Education's Generative AI: product safety expectations, must be assessed for data protection

compliance before use, and must fall within the school's filtering and monitoring arrangements. Students are taught about the risks and limitations of generative artificial intelligence as part of the curriculum, and the school's expectations on acceptable use are set out in the Online Safety and Acceptable Use Policy.

Any incident involving artificial intelligence generated sexual images of a child, whether created by a student, a member of staff or an unknown third party, will be reported to the DSL immediately and treated as child sexual abuse material. The DSL will contact the police and, where appropriate, the Internet Watch Foundation and the Report Remove service operated by Childline and the Internet Watch Foundation.

SECTION 6.19 – MOBILE PHONES AND PERSONAL DEVICES

KCSIE 2026 adds a section reflecting the Department for Education's guidance on mobile phones in schools. AJI operates as a mobile phone free environment for pupils during the school day. Arrangements for the storage, surrender and return of devices, and the sanctions for breach, are set out in the Mobile Phone and Personal Devices Policy and in the Behaviour Policy.

The school recognises that boarders have a legitimate need to contact family, including internationally and across time zones, and National Minimum Standard 12.1 requires that this contact can take place in private and at a time suitable to both parties. The school therefore permits supervised and time limited access to devices or to school provided means of contact during boarding time, operates proportionate systems to monitor and control the use of electronic communications in order to detect abuse, bullying or unsafe practice, and is sensitive to any restriction on a boarder's contact with particular family members.

National Minimum Standard 8.4 requires the school's child protection policy to address how boarders' devices are managed, including devices brought into school, harmful content already downloaded onto a device, and the ability to access harmful content over 3G, 4G and 5G mobile data, which bypasses the school's filtering and monitoring systems. The school addresses this through: a device registration and risk assessment process on arrival; clear rules on where and when devices may be used, which exclude bedrooms, bathrooms, changing areas and prayer areas; periodic device checks carried out in accordance with the searching, screening and confiscation guidance and with the boarder present wherever possible; education for boarders on online safety; and prompt reporting of any concern to the DSL.

Staff must not use personal devices to photograph, film, record or message students, and must not communicate with students through personal accounts or private messaging services. All communication with students takes place through school systems.

SECTION 7 – RACIST INCIDENTS

7.1 Our policy on racist incidents is set out within our Anti-Bullying Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We maintain a log of racist incidents in school.

SECTION 8 – ANTI-BULLYING

8.1 Our policy on anti-bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. All incidences of bullying, including cyber-bullying, sexting, racist, homophobic and gender-related bullying, will be dealt with in accordance with our Anti-Bullying Policy. We recognise that children with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in school.

- 8.2 We recognise that there will be occasions when bullying incidents will fall within child protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to the social services or to the Police.

SECTION 9 – ONLINE SAFETY, FILTERING AND MONITORING (refer to KCSIE 2026)

- 9.1 The DSL understands the unique risks associated with online safety and has the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- 9.2 The DSL is able to recognise the additional risks that children with SEN and disabilities face online, for example from online bullying, grooming and radicalisation and has the capability to support SEND children to stay safe online.
- 9.3 All members of staff are trained in and receive regular updates in E-Safety and recognising and reporting concerns.
- 9.4 Our Acceptable Use Policy recognises that internet safety is a whole school responsibility (staff, pupils, trustees and parents).
- 9.5 Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal.
- 9.6 We therefore recognise our responsibility to educate our pupils, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.
- 9.7 The school will ensure that filtering and monitoring systems are reviewed regularly for effectiveness, particularly in light of emerging risks such as generative AI.
- Any AI tools used within the school must align with the Department for Education's **Generative AI: Product Safety Expectations**, ensuring they are safe, secure, transparent, and compliant with data protection requirements.
- 9.8 Staff need to be trained in the expectations and applicable roles and responsibilities in relation to filtering and monitoring. DSL responsibility should include the understanding of the filtering and monitoring systems and processes in place at a school. Schools should adhere to the DFE filtering and monitoring standards.
- 9.9 Online safety risks include harmful content, contact, conduct, and commerce. This now explicitly covers exposure to **misinformation, disinformation, and conspiracy theories**, alongside other risks such as self-generated sexual content and extremist material.
- 9.10 From September 2026 the school reviews the effectiveness of its filtering and monitoring systems at least once every academic year, and after any significant change to its systems, provision or premises. The review is led by the identified member of the senior leadership team, supported by the DSL and the school's IT provider, and covers: whether filtering operates on all internet connected devices, including devices used by staff and by boarders; whether it operates in all relevant locations, including classrooms, study areas, boarding houses and staff accommodation to which pupils may have access; whether monitoring alerts are reaching the right people and being acted upon; and whether the systems remain effective against emerging risks including generative artificial intelligence and virtual private networks. The review, its findings and the resulting actions are recorded and reported to the governing body.
- 9.11 Filtering and monitoring must not be used as a substitute for supervision, and must not intrude unreasonably on boarders' privacy. The school's approach balances the requirements of KCSIE 2026 with National Minimum Standards 4.2, 4.8 and 12.1. Any use of biometric technology or CCTV is set out in the school's Security Policy, is registered with the Information Commissioner's Office where required, complies with the Protection of Freedoms Act 2012 and data protection legislation, and does not extend to bedrooms, bathrooms, changing areas or prayer areas.

- 9.12 All incidents involving the sharing of indecent or semi-indecent images of a child require a safeguarding response, whether consensual or non-consensual, and whether the image is genuine, digitally altered or wholly generated using artificial intelligence. Staff must never view, copy, forward, print or store such an image, and must report it to the DSL immediately in accordance with Appendix 6.
- 9.13 The school teaches online safety through the curriculum, the boarding programme and the RSHE and PSHE programme, covering content, contact, conduct and commerce risks, including misinformation, disinformation and conspiracy theories, extremist material, self generated sexual content, online grooming, financially motivated sexual extortion, gambling and in-game purchasing, and the use of generative artificial intelligence.
- 9.14 The school communicates with parents and carers about what filtering and monitoring systems are in place, what students are asked to do online, and who, if anyone, students will interact with online, and provides parents with guidance on keeping children safe online at home and during school holidays.

SECTION 10 – SUPPORTING CHILDREN

SECTION 10.1 SUPPORTING CHILDREN

- 10.1 We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame.
- 10.2 We acknowledge that school may be the only stable, secure and predictable element in the lives of children who have been abused or who are at risk of harm.
- 10.3 We are aware that research shows that at school, their behaviour may be challenging and defiant or they may be withdrawn.
- 10.4 **The school will endeavour to support all children by:**
- Encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, challenging bullying and humiliating behaviour.
 - Promoting a positive, supportive and secure environment giving pupils a sense of being valued.
 - A consistently applied school behaviour policy which is aimed at supporting vulnerable pupils. The school will ensure that the pupil knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred.
 - Liaising with other agencies that support the pupil such as Children's Social Care Services, Child and Adult Mental Health Service (CAMHS), Educational Psychology Service and those agencies involved in the Safeguarding of Children.
 - The use of Early Help Services, through the Social Services, when appropriate.
 - Notifying Children's Social Care Services immediately if there is a significant concern.
 - Providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that appropriate information is forwarded under confidential cover to the child's new setting.

SECTION 10.2 – LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN

The most common reason for children becoming looked after is as a result of abuse or neglect. The school will ensure/ensures that staff have the necessary skills, knowledge and understanding to keep looked after children safe. Appropriate staff will have information about a child's looked after legal status and contact

arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looking after children and the DSL will have details of the child's social worker and the name and contact details of the Local Authority's Virtual Head for children in care and previously looked after children. Staff will liaise with the VSH where appropriate to support the education and welfare of these pupils.

We recognise that previously looked after children potentially remains vulnerable and therefore ensure that All staff will have the skills, knowledge and understanding to keep previously looked after children safe.

Our DSL/DDSL have the appropriate training and relevant qualifications and experience of working with this group of children

The DSL will obtain details of the Local Authority Personal Adviser appointed to guide and support each care Leaver and will liaise with them regarding any issues of concern affecting the care leaver.

SECTION 10.3 – SPECIAL EDUCATIONAL NEEDS OR DISABILITY (SEND) / CERTAIN HEALTH CONDITIONS

We recognise that children with SEND, or certain health conditions can face additional safeguarding challenges and these are discussed in Staff Training. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further explanation
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges
- AJI SEND policy can be sought for further information and also SENDIASS for additional information and support

At AJI we will identify students who may need more support to be kept safe or to keep themselves safe and will always consider and provide extra pastoral support for children with SEND or certain health conditions to address these additional challenges, along with ensuring any appropriate support for communication is in place

SECTION 10.4 – CHILDREN POTENTIALLY AT GREATER RISK OF HARM

At AJI we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker by providing them with additional pastoral / academic support.

When placing a pupil in alternative provision, the school remains responsible for their safeguarding. We will obtain written confirmation from the provider that appropriate safeguarding checks have been completed, that the provider will notify us of any staff changes or arrangements that may increase risk, and that we have the provider's full address details.

All alternative provision placements will be reviewed **at least half-termly** to ensure the child's attendance, safety, and wellbeing. KCSIE 2026 confirms that the school continues to be responsible for the safeguarding of any pupil it places with an alternative provision provider, and that responsibility cannot be delegated to the provider.

SECTION 11 – POSITIVE PHYSICAL INTERVENTION / USE OF REASONABLE FORCE

- 11.1 Our policy on positive handling is set out in a separate policy (*See Physical Intervention Policy*) and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury or damage to property.
- 11.2 We acknowledge that when applying reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, it is important to recognise their additional vulnerability and make every effort to reduce the occurrence of challenging behaviour and the need to use reasonable force.
- 11.3 We understand that physical intervention of a nature that causes injury or distress to a child may be considered under management of allegations or disciplinary procedures.
- 11.4 Staff who are likely to need to use physical intervention will be appropriately trained in the Team Teach Technique, or equivalent.
- 11.5 All incidences of physical intervention will be recorded in accordance with the Team Teach recommended procedures.
- 11.6 We recognise that touch is appropriate in the context of working with children and all staff have been given 'safe working practice' guidance to ensure they are clear about their professional boundaries.
- 11.7 We recognise that the adoption of a 'no contact' policy could leave staff unable to fully support and protect our pupils.
- 11.8 Corporal punishment is prohibited in all schools by section 548 of the Education Act 1996, and that prohibition extends to any person acting in loco parentis, including boarding and residential staff, visiting scholars, volunteers and prefects, and applies at all times including during religious instruction and during boarding time. No member of staff or student may strike, push, shake, throw an object at, or otherwise physically chastise a pupil, or require a pupil to adopt a painful or degrading posture as a punishment. Any allegation of corporal punishment will be treated as an allegation against a member of staff under Section 17 of this policy and reported to the Local Authority Designated Officer.
- 11.9 Prefects and student monitors have no authority to use physical intervention, to impose physical sanctions, or to search another student or their possessions. Their duties, powers, limits and supervision arrangements are set out in writing in accordance with National Minimum Standard 21, and they receive training and ongoing supervision. Any concern about the misuse of a prefect role is reported to the DSL.
- 11.10 The school's approach to reasonable force and restrictive intervention reflects the current Department for Education guidance on the use of reasonable force and restrictive intervention in schools. Every incident of physical intervention is recorded, reported to a senior leader on the same day, communicated to parents, and reviewed by senior leaders to identify patterns, training needs and opportunities for de-escalation. Senior leaders monitor the use of restraint, take action to prevent its inappropriate use, and take effective action where inappropriate restraint has been used, in accordance with National Minimum Standard 15.3.
- 11.11 Seclusion and any practice that deprives a pupil of liberty are not used at AJI. No pupil will be confined alone in a locked room or any other space from which they cannot leave.

SECTION 12 – RECORD KEEPING

- 12.1 Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse, will make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the child's own words as far as possible. All notes should be timed,

dated and signed, with the name printed alongside the signature. Concerns will be recorded using the school's safeguarding children recording system.

12.2 All records of a child protection nature will be passed to the DSL including case conference or core group minutes, child protection plans and written records of any concerns. Child protection records are kept securely under lock and key or password protected, with only appropriate persons having access to them.

12.3 Any referrals made to other agencies, including referrals to Children's Social Care, will be copied prior to sending and stored in the child's child protection file.

12.4 The DSL will maintain and regularly audit the school's child protection records, ensuring that each stand-alone file includes a chronology of significant events and that information and contact details are accurate and up to date.

12.5 The DSL will transfer the child protection record in a safe and timely manner when a child moves school, ensuring receipt of transfer is obtained.

12.6 The DSL may copy child protection records generated by the school prior to transfer and retain for as long as is necessary (normally DOB. + 25 years), where there is justification for believing that the records may be required as evidence of the school's involvement with the child for statutory purposes (e.g. court cases or serious case reviews). When the records are no longer required, they will be securely disposed of.

12.7 The school follows the Department for Education's data protection guidance for schools, together with the Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025. Safeguarding records are processed on the lawful bases of public task and legal obligation, and, for special category data, on the substantial public interest condition relating to the protection of children.

12.8 Where the Single Unique Identifier introduced by the Children's Wellbeing and Schools Act 2026 is brought into operation, the school will record and share it in accordance with the regulations and statutory guidance then in force, and will update its information systems and privacy notices accordingly.

12.9 Safeguarding records will record what was observed or said, who reported it, the date and time, the action taken, the rationale for every decision including a decision not to refer, and the outcome. Records will distinguish clearly between fact, opinion and hearsay. Records will not be amended after the event; any correction is made as a dated addition, and the original entry is retained.

SECTION 13 – INFORMATION SHARING & CONFIDENTIALITY

- 13.1 Information sharing is vital in identifying and tackling all forms of abuse.
- 13.2 The school is committed to protecting personal data in compliance with the Data Protection Act 2018 and the UK GDPR. Staff must follow the Department for Education's guidance on data protection to prevent breaches and ensure the safety of all personal information.
- 13.3 We recognise that all matters relating to child protection are confidential.
- 13.4 The Head teacher or DSL will disclose any information about a pupil to other members of staff on a need-to-know basis only.
- 13.5 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 13.6 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.
- 13.7 When a child about whom concerns have been raised and recorded leaves the school, the DSL will consider if it would be appropriate to share information with the new school in advance of the child leaving to ensure that support is in place for when the child arrives.
- 13.8 Data protection law is not a barrier to sharing information for the purposes of keeping children safe. Working Together to Safeguard Children 2026 strengthens the expectation that information is shared lawfully, proactively and in a timely way to support early identification of risk and co-ordinated decision making. Fears about sharing information must never be allowed to stand in the way of safeguarding a child. Staff should record the reasons for sharing, or for not sharing, information.
- 13.9 Under the Children's Wellbeing and Schools Act 2026 the school is a relevant partner in local safeguarding arrangements and will co-operate with requests for information from the safeguarding partners and from any multi-agency child protection team, subject to the usual proportionality and necessity considerations.
- 13.10 Consent is not required to share information where a child is at risk of significant harm, where seeking consent would place a child or adult at increased risk, or where it would prejudice the prevention, detection or prosecution of a crime. Where a child aged 16 or over, or a Gillick competent younger child, asks that information is not shared, the DSL will weigh that view carefully but will always act to protect the child where the risk requires it, and will explain to the child what will be shared, with whom and why.

SECTION 14 – COMMUNICATION WITH PARENTS

- 14.1 We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively.
- 14.2 We will always undertake appropriate discussion with parents prior to involvement of another agency unless to do so would place the child or an adult at further risk of harm or would impede a criminal investigation.
- 14.3 We will ensure that parents understand the responsibilities placed on the school and staff to safeguard children and their duty to co-operate with other agencies in this respect.

SECTION 15 – SUPPORTING AND SUPERVISION OF STAFF

- 15.1 We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

- 15.2 We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support such as counselling or regular supervision, as appropriate.
- 15.3 We will enable supervision for the DSL through network meetings, direct consultation with the Safeguarding in Education Adviser or Consultant Social Workers in order to promote best practice and challenge unsatisfactory or poor practice.
- 15.4 In order to reduce the risk of allegations being made against staff, and ensure that staff are competent, confident and safe to work with children, they will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour.

SECTION 16 – SAFER RECRUITMENT AND SELECTION OF STAFF

- 16.1 The school has a clear policy on Safer Recruitment. The policy will be available to all candidates. KCSIE 2026 confirms that a curriculum vitae (CV) should only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment, whilst AJI may consider online searches as part of their due diligence checks on shortlisted candidates, as such this aims to make the recruitment process more robust as pointed in 16.2.
- 16.2 The recruitment process is robust in seeking to establish the commitment of candidates to support the school's measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them.
- 16.3 References are requested and scrutinised for all candidates prior to interview and any discrepancies or concerns are raised and discussed during interview, including for any volunteers and internal candidates. References are always requested directly from the referee and verified as being from a senior person with appropriate authority; electronic references are checked to ensure they originate from a legitimate source. Where specific questions have not been answered satisfactorily or insufficient information is provided, the referee will be contacted directly for further clarification. Where references are not forthcoming, despite reminders, the candidate will be asked to provide an alternative referee.
- 16.4 All staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications and a satisfactory barred list check, enhanced DBS check and a right to work in the UK.
- 16.5 All teachers working within our school have been checked using the Teacher Services Website to ensure they have been awarded QTS or not and that they have completed their teacher induction and that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions, e.g. management posts.
- 16.6 The school seeks written assurance from supply and third-party agencies, alternative providers, initial teacher training providers and contractors that they have undertaken all appropriate checks on any of their staff that work with or have regular contact with our pupils.
- 16.7 Our trustees are subject to an enhanced DBS check without barred list check and have been checked to ensure they are not disqualified from holding office under a Section 128 direction.
- 16.8 The school maintains a single central record of recruitment checks for audit purposes.
- 16.9 Any member of staff working in regulated activity prior to receipt of a satisfactory DBS check will not be left unsupervised and will be subject to a risk assessment.
- 16.10 Volunteers who are not working in regulated activity, will be supervised at all times. A risk assessment will be undertaken to help decide whether or not an enhanced DBS check, without barred list check, is required.
- 16.11 For any shortlisted candidates an online search shall take place prior to appointment, this shall also be included in advertisement made by AJI.

Removal of the supervision exemption from regulated activity

- 16.12 The Crime and Policing Act 2026 removed the supervision exemption from the definition of regulated activity with effect from 1 September 2026. Any person who teaches, trains, instructs, cares for or supervises children on more than three days in any period of 30 days, or at any time between 2am and 6am with the opportunity for face to face contact, is now engaged in regulated activity even where a colleague supervises them.
- 16.13 This has significant consequences at AJI because of the school's residential provision and its use of volunteers, visiting scholars and student helpers. The school has therefore reviewed every role and, from 1 September 2026: all volunteers who meet the frequency or overnight test obtain an enhanced DBS certificate with a check of the children's barred list before commencing; the single central record has been updated to reflect the revised status of each role; and no person will begin a role that now falls within regulated activity until the appropriate check has been received and recorded.
- 16.14 Any person who is permitted to start work in regulated activity before an enhanced DBS certificate has been received, in the limited circumstances where a separate barred list check has been obtained, will be supervised at all times by a person in regulated activity who has been fully checked, will not be permitted to be alone with pupils, will not undertake night duty, and will be subject to a written risk assessment retained on file.
- 16.15 The school carries out online searches on shortlisted candidates as part of its due diligence, informs candidates in advance that this will take place, confines the search to publicly available information relevant to the role, records only what is relevant, and gives any candidate the opportunity to respond to anything found before a decision is taken.
- 16.16 In accordance with National Minimum Standards 19.2 and 19.3, every member of a staff household and every other person aged 16 or over who is not on the roll of, or employed by, the school and who lives on the same premises as boarders obtains an enhanced DBS certificate with a check of the children's barred list, and is party to a written agreement covering the terms of their accommodation, expectations on contact with pupils, responsibility for supervising their own visitors, notice that accommodation may cease to be provided if they are found to be unsuitable, and a requirement to notify a designated senior member of staff if they are charged with or convicted of any offence.
- 16.17 Where the school appoints an educational guardian for a boarder, that guardian is subject to the same safer recruitment procedures as staff, and the suitability of the arrangement is monitored. No member of school staff will be appointed as an educational guardian for a boarder. Where a guardian is appointed by a parent, the school takes appropriate steps to satisfy itself that the arrangement promotes the welfare of the boarder, and acts immediately on any concern.
- 16.18 Where any adult, including a member of staff, a member of a staff household or a visiting scholar, has been resident overseas, the school obtains a certificate of good conduct or equivalent overseas criminal records check where one is available, and where it is not, records the additional checks and enquiries it has undertaken and the rationale for its decision. Overseas checks are recorded on the single central record.
- 16.19 The school makes a referral to the Disclosure and Barring Service where a person in regulated activity is dismissed, removed from regulated activity or resigns in circumstances where the harm test is met, and to the Teaching Regulation Agency where the case concerns a teacher and may warrant a prohibition order. Failure to comply with the statutory duty to report child sexual abuse is a matter that may be referred to the DBS.

SECTION 17 – ALLEGATIONS AGAINST STAFF

- 17.1 We acknowledge that a pupil may make an allegation against a member of staff or volunteer.
- 17.2 If such an allegation is made, which meets the criteria as identified in Part 4 of Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the Head teacher, unless the allegation concerns the Head teacher, in which case the Chair of Trustees will be informed immediately. Where the Head teacher is the sole proprietor, the allegation will be reported directly to the Local Authority Designated Officer (LADO).
- 17.3 The DSL / Head teacher / Chair of Trustees on all such occasions will discuss the content of the allegation with LADO, prior to undertaking any investigation.
- 17.4 The school will follow the DfE, BSCB and LA procedures for managing allegations against staff, a copy of which is available in school.
- 17.5 The case manager will be guided by the LADO in all matters relating to the case, including suspension, sharing of information and any follow up investigation.
- 17.6 The school distinguishes between allegations that meet the harm threshold in Part Four of Keeping Children Safe in Education, which are referred to the LADO within one working day, and low-level concerns, which are behaviours that are inconsistent with the Staff Code of Conduct but do not meet the harm threshold. Low-level concerns are shared with the DSL or directly with the Head teacher. The Head teacher is ultimately informed of all low-level concerns and makes the final decision on how to respond, where appropriate in consultation with the DSL. Low-level concerns are recorded in a central, confidential record, are reviewed periodically to identify patterns, and are considered when providing references. Low-level concerns about supply staff and contractors are notified to their employers. The school will consult the LADO where it is unsure whether a low-level concern meets the harm threshold.
- 17.7 KCSIE 2026 adds new content on responding to allegations relating to organisations or individuals using the school premises. Where an allegation is made against a person connected to an organisation hiring or otherwise using the school site, the school will follow its own allegations procedures, will report to the LADO where the harm threshold is met, will require the organisation to co-operate, and will consider whether to suspend or terminate the hiring arrangement. The school will not assume that another body has taken responsibility for reporting.
- 17.8 Allegations may relate to conduct that took place outside the school, historically, or in a person's private life, and will be considered on a transferable risk basis. The school will not carry out its own investigation before consulting the LADO, will not require or permit a member of staff to be interviewed by the person alleged to have caused harm, and will maintain a written record of every decision and its rationale.
- 17.9 Where an allegation concerns a member of a staff household, a person living on the school premises, an educational guardian, a host family, a prefect or a student aged 18 or over, the school will apply these procedures so far as they are applicable and will seek advice from the LADO.

SECTION 18 – ABUSE OF POSITION OF TRUST

- 18.1 We recognise that as adults working in the school, we are in a relationship of trust with pupils in our care and acknowledge that it could be considered a criminal offence to abuse that trust.
- 18.2 We acknowledge that the principle of equality embedded in the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation: neither homosexual or heterosexual relationships are acceptable within a position of trust.

- 18.3 We recognise that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age.
- 18.4 The Police, Crime, Sentencing and Courts Act 2022 extended the abuse of position of trust offences in the Sexual Offences Act 2003 so that they apply expressly to any person who coaches, teaches, trains, supervises or instructs a child in a sport or a religion. Every member of staff, volunteer and visiting scholar who teaches or supervises students in religious study at AJI is therefore in a position of trust in law. Any sexual activity with a student under the age of 18 is a criminal offence, irrespective of the age of consent and irrespective of whether the student appears to consent.
- 18.5 The school's expectations extend beyond the criminal threshold. Staff must not form or pursue an emotional or romantic relationship with any student, must not give personal gifts, money or preferential treatment, must not communicate with students privately or through personal accounts, must not invite students into staff accommodation, and must not arrange to meet students outside school activities. Grooming behaviour frequently begins with conduct that appears benign, and staff are expected to challenge and report such behaviour in colleagues.
- 18.6 Where a student is aged 18 or over, sexual or romantic relationships between that student and any member of staff remain wholly prohibited under the Staff Code of Conduct, will be treated as a serious disciplinary matter, and will be considered for referral to the LADO because of the transferable risk to students under 18.

SECTION 19 – COMPLAINTS OR CONCERNS EXPRESSED BY PUPILS, PARENTS, STAFF OR VOLUNTEERS

- 19.1 We recognise that listening to children is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.
- 19.2 We will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the school will take but also the length of time that will be required to resolve the complaint. The school will also endeavour to keep the child or adult regularly informed as to the progress of his/her complaint. The school's complaints procedures are readily available.
- 19.3 At AJI we recognise that children may not feel ready or know how to tell someone they are being abused and this is referenced also in KCSIE 2025. In this regard the pastoral systems and class/board monitoring and support may provide various opportunities for pupils to tell.

SECTION 20 – WHISTLEBLOWING (CONFIDENTIAL REPORTING)

- 20.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 20.2 All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the school's confidential reporting (whistleblowing) policy.
- 20.3 Whistleblowing concerns about the Head teacher should be raised with the Chair of the Governors. Where the Head Teacher is also the sole proprietor, concerns should be reported directly to the Local Authority Designated Officer (LADO).
- 20.4 Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the NSPCC whistleblowing helpline.
- 20.5 The role of Trustees in safeguarding is vital. KCSIE 2026 emphasises that governors and trustees should receive appropriate safeguarding and child protection training at induction, and then at regular intervals. Training should provide them with the knowledge to ensure their school's safeguarding policies and procedures are effective. Trustees must be confident about all duties

including whistleblowing and concerns in relation to pupils/staff and visitors that may come to the institution.

- 20.6 It is a criminal offence under the Crime and Policing Act 2026, punishable by up to seven years' imprisonment, for any person to engage in conduct intended to prevent a report being made under the statutory duty to report child sexual abuse. This applies to any person, not only to those subject to the duty. No member of staff, student, parent or volunteer will be discouraged, obstructed, delayed or penalised for reporting a safeguarding concern to the school or to an external agency.
- 20.7 Protection under the Public Interest Disclosure Act 1998 applies to staff who make a protected disclosure. The school will not use, and will not ask any person to sign, a confidentiality clause, settlement agreement or non-disclosure agreement that has the effect of preventing a person from making a safeguarding disclosure to a regulator, the police, the local authority, Ofsted or the Department for Education.
- 20.8 Staff, parents and students may raise concerns directly with Ofsted, the Department for Education, the NSPCC whistleblowing advice line, the Report Abuse in Education helpline, or the police, and are not required to exhaust internal procedures first where they believe a child is at risk.

SECTION 21 – PHOTOGRAPHY AND USE OF IMAGES (INCLUDING HANDHELD DEVICES)

- 21.1 The welfare and protection of our children is paramount, and consideration should always be given to whether the use of photography will place our children at risk. Images may be used to harm children, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites.
- 21.2 For this reason, consent is always sought when photographing children using any means and including iPads, smart phones or cameras and additional consideration given to photographing vulnerable children, particularly Looked After Children or those known to be fleeing domestic violence. Consent must be sought from those with parental responsibility (this may include the Local Authority in the case of Looked After Children).
- 21.3 Many pupils own or have access to handheld devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

SECTION 22 – STAFF / PUPIL RELATIONSHIPS

The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

SECTION 23 – HEALTH & SAFETY

- 23.1 Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the safeguarding of our children both within the school environment and when away from the school, for example when undertaking school trips and visits.
- 23.2 Risk Assessments are undertaken and reviewed regularly, in respect of site security, risk of children being drawn into terrorism or exposed to extremist behaviour, risk to and from children displaying harmful behaviour.

SECTION 24 – SAFE ENVIRONMENT

- 24.1 The school undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.
- 24.2 The school has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of school hours.
- 24.3 Visitors to the school, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material.
- 24.4 The Terrorism (Protection of Premises) Act 2025, known as Martyn's Law, places duties on education settings, which are treated as standard tier premises regardless of capacity. The compliance deadline is expected to be spring 2027 and the Security Industry Authority will be the regulator. In preparation, the school maintains documented public protection procedures covering evacuation, invacuation, lockdown and communication, trains all staff, including boarding and night staff, in those procedures, and practises them. The procedures are integrated with the school's fire, safeguarding and emergency plans and take account of the fact that students are resident on site overnight.
- 24.5 The school maintains a written site security risk assessment covering perimeter security, access control, visitor management, out of hours and overnight security, deliveries and contractors, and the separation of any hired areas from pupil and boarding areas. Any use of CCTV or biometric technology is set out in the Security Policy, does not extend to bedrooms, bathrooms, changing areas or prayer areas, and is not used to compensate for inadequate staffing levels.
- 24.6 All visitors sign in, are identity checked, wear a visible badge that distinguishes checked from unchecked visitors, and unchecked visitors are supervised at all times. Contractors working in or near boarding accommodation are escorted and are never left with unsupervised access to boarders. Contractors working on site during boarding time are subject to a written risk assessment.

SECTION 25 – PRIVATE FOSTERING ARRANGEMENTS

- 25.1 A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.
- 25.2 Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.
- 25.3 Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases, so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.
- 25.4 By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Services as soon as possible.
- 25.5 If we become aware of a privately fostering arrangement, we will check that Children's Services have been informed.

SECTION 26 – CHALLENGE AND ESCALATION

- 26.1 We recognise that professional disagreements may arise between any agencies. Resolving problems is an integral part of co-operation and joint working to safeguard children.

- 26.2 As part of our responsibility for safeguarding children, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.
- 26.3 We are aware of the BSCB escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children.

SECTION 27 – MONITORING AND EVALUATION

27.1 Our Safeguarding Children policy and procedures will be monitored and evaluated by:

- Pupil surveys and questionnaires.
- Discussions with children and staff.
- Scrutiny of data and risk assessments.
- Scrutiny of the school's single central record of recruitment checks.
- Monitoring of logs of bullying/racist/behaviour incidents and PPI records.
- Supervision of staff involved in child protection.
- Case File Audits undertaken by the DSL and the BSCB.

SECTION 28– HOMELESSNESS

- 28.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into Children's Social Care where a child has been harmed or is at risk of harm.
- 28.2 The Homelessness Reduction Act (2017) places a new legal duty on English Councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.
- 28.3 In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases, 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's Services will be the lead agency for these young people and the Designated Safeguarding Lead (or a Deputy) should ensure appropriate referrals are made on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation.

SECTION 29 – OTHER RELEVANT POLICIES

- 29.1 The Trust Board's statutory responsibility for safeguarding the welfare of children goes beyond basic child protection procedures.

29.2 The duty is now to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, for instance:

- Staff Code of Conduct
- Allegations of Abuse against Teachers and other Staff
- Complaints Procedure
- **Behaviour Management** (this document provides advice on how to create a whole school positive behaviour culture, including promoting positive mental health.)
- Child on child Abuse policy & procedural guidance. (Including Sexual Violence and Sexual Harassment between Children)
- Anti-Bullying, including cyber-bullying
- Positive Physical Intervention
- Special Educational Needs
- Trips and visits
- Work experience and extended work placements
- First aid and the administration of medicines
- Health and Safety
- Sex and Relationships Education
- Safe and Appropriate Use of Images
- Equal Opportunities
- E-Safety and Acceptable Internet Use
- Whistleblowing (Confidential Reporting)
- Preventing Extremism and Radicalisation
- Mobile Phone and Personal Devices Policy
- Filtering and Monitoring Statement and annual review record
- Low-Level Concerns Policy
- Searching, Screening and Confiscation Policy
- Boarding Handbook, Statement of Boarding Principles and Practice, and the boarding policies and records listed at Appendices A and B of the National Minimum Standards
- Missing Child and Missing Boarder Policy
- Prefects and Student Monitors: duties, powers and responsibilities
- Educational Guardianship, Lodgings and Host Families Policy
- Care of Boarders who are Unwell, including administration of medication
- Mental Health and Emotional Wellbeing Policy
- Relationships, Sex and Health Education and PSHE Policy
- Artificial Intelligence Acceptable Use Statement
- Data Protection Policy, Records Retention Schedule and Privacy Notices
- Lettings and Hire of Premises Policy
- Emergency, Lockdown and Business Continuity Plan (Martyn's Law public protection procedures)
- Attendance Policy and Children Absent from Education procedures
- Supervision of Unchecked Staff and Visitors
- 29.3 The above list is not exhaustive but when undertaking development or planning of any kind, the school will need to consider safeguarding matters.

SECTION 30 – EXTERNAL CONTACTS

AGENCY	PHONE NUMBER
Referral and Assessment Team (MASSS)	

	01204 331500
Lisa Kelly – Local Authority Designated Officer (LADO)	01204 337474
Jo Nicholson – Safeguarding in Education Team	01204 337472
Natalie France – Safeguarding in Education Team	01204 331314
Early Help Integrated Working Team Manager	01204 331392
Bolton Safeguarding Partnership	01204 337964
Missing from Education	01204 332139
Emergency Duty Team – Out of Hours	01204 337777
Police – Safeguarding Vulnerable Persons Unit	0161 8566583
Police – Public Protection Investigation Unit (Child Protection)	0161 8567949

National contacts

- NSPCC Whistleblowing Advice Line for professionals: 0800 028 0285
- Report Abuse in Education helpline (NSPCC): 0800 136 663
- Department for Education counter-extremism helpline: 020 7340 7264
- Ofsted whistleblowing line: 0300 123 3155
- Childline: 0800 1111
- Children's Commissioner Help at Hand: 0800 528 0731
- Anti-Terrorist Hotline: 0800 789 321. In an emergency, always call 999.
- Modern Slavery Helpline: 08000 121 700
- Internet Watch Foundation and Childline Report Remove service, for the removal of a nude or sexual image of a person under 18

Contact details for the local authority, the LADO and the safeguarding partners are checked and updated by the DSL at each annual policy review, and displayed in the staff room, the school office and every boarding house.

SECTION 31 - INDIVIDUALS HIRING OUT THE SCHOOL PREMISES

Individuals who in the event when they hire out a particular part of the school will be subject to the same safeguarding procedures as the rest of the school is, including reporting Allegations to the LADO as and when the need arises.

KCSIE 2026 strengthens expectations in this area. Before any letting or hire is agreed, the school will: satisfy itself that the hirer has appropriate safeguarding arrangements, including a safeguarding policy, a named safeguarding lead and appropriate DBS checks on anyone who will work with children; put in place a written agreement that requires the hirer to comply with the school's safeguarding expectations, to report any safeguarding concern to the school's DSL as well as to the relevant statutory agency, and to co-operate with any investigation; define precisely which areas of the site may be used and at what times; and ensure that hirers and their participants have no access to boarding accommodation, to areas occupied by boarders, or to pupil records.

Where an allegation is made against an individual connected with an organisation using the school premises, the school will apply Section 17 of this policy, will report to the LADO where the harm threshold is met, and will consider suspending or terminating the arrangement. The school will not assume that the hirer or another agency has taken responsibility for reporting.

Where the school provides, hosts or is associated with any out-of-school provision, supplementary schooling, evening or weekend madrasah class, holiday provision or tuition, whether run by the school or by a third party, it will apply the Department for Education guidance on keeping children safe in out-of-school settings, and will satisfy itself that safeguarding arrangements, staff checks, supervision ratios, health and safety and complaints routes are in place and monitored.

Parents and students are told how to raise a concern about any activity taking place on the school site, including activities not run by the school.

SECTION 32 – CONTEXTUALISED SAFEGUARDING

Our school assesses the risks and issues in the wider community when considering the well-being and safety of its students.

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

All staff, especially the DSL and DDSL will consider whether children are at risk of abuse or exploitation in situations outside their home and families will provide as much information as possible when making a referral to social care.

Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

SECTION 33 – SAFEGUARDING ARRANGEMENTS FOR BOARDERS

AJI is a boarding school, and this section sets out how the safeguarding arrangements above are applied and supplemented for boarders, in accordance with the National Minimum Standards for Boarding Schools (May 2026 edition, issued under section 87C of the Children Act 1989) and Keeping Children Safe in Education 2026, which for the first time includes a dedicated section on boarding and residential accommodation. The National Minimum Standards apply to all boarders under 18, to any boarder aged 18 or over who lives in the same accommodation as a pupil under 18, and to any child accommodated at the school other than its own boarders.

24-hour safeguarding cover

The DSL and Deputy DSLs' out-of-hours availability described in Section 4 extends to all boarding time, including evenings, nights and weekends during term time. A senior member of boarding staff is on call at all times boarders are on site and knows how to contact the DSL or a Deputy DSL, or, if a child is in immediate danger, the police, without delay.

Missing boarder procedure

In line with National Minimum Standard 20.6, the school maintains a written missing boarder procedure. If a boarder cannot be accounted for at any headcount or bedtime check, staff will immediately search boarding areas and school grounds, contact the boarder's mobile/known contacts, and, if the boarder is not found within a short, defined period, notify the DSL (or on-call senior leader), the boarder's parents/carers or educational guardian, and the police. All missing boarder incidents are recorded and reviewed to identify any pattern or underlying welfare concern.

Boarders' access to help and an Independent Listener

Boarders are made aware of an Independent Listener, external to the day-to-day management structure, whom they can contact in confidence, together with details of Childline and the NSPCC, displayed prominently in boarding areas. This is in addition to, not instead of, the routes to the DSL described elsewhere in this policy.

Staff and other adults living on or visiting the boarding premises

Consistent with Section 16 of this policy and National Minimum Standards 19.2 and 19.3, any member of a staff household or other person aged 16 or over living on the same premises as boarders is subject to an Enhanced DBS check with barred list information before taking up residence, and to a written agreement covering conduct towards pupils. Visitors to boarding accommodation, including contractors, are signed in, never left unsupervised with boarders, and made aware of the school's code of conduct.

Induction and preparation for boarding

New boarders and their parents/carers are given age-appropriate information, before or on arrival, about how to raise a concern, keeping safe online and in boarding houses, and who the DSL, Deputy DSLs and Independent Listener are. Boarding staff receive additional induction and training on boarding-specific safeguarding risks, including peer-on-peer abuse in a residential setting, sexting, and the heightened vulnerability of boarders who cannot leave the school environment at the end of the day.

Boarding governance and leadership

The governing body monitors the effectiveness of the leadership, management and delivery of boarding and welfare provision and takes action where necessary, in accordance with National Minimum Standards 2.1 to 2.5. There is clear leadership of boarding, effective links between academic and residential staff, and senior boarding staff who are knowledgeable, experienced and trained in the management and practice of boarding. The school maintains a Statement of Boarding Principles and Practice that is available to parents, carers and staff and is known to and understood by boarders.

The school maintains all of the policies listed at Appendix A and all of the records listed at Appendix B of the National Minimum Standards. Those records are monitored by the Head teacher or a senior member of staff to identify whether a change in welfare practice is needed, and are reported to the governing body at least termly.

The boarding child protection policy requirements at National Minimum Standard 8.4

National Minimum Standard 8.4 requires this policy to address four matters specific to boarding. The school's position on each is as follows.

First, sexual relationships between children. Sexual activity between students is not permitted at AJI. Any sexual activity or sexualised behaviour between students, whether apparently consensual or not, is a safeguarding matter and must be reported to the DSL immediately, who will consider the ages and relative power of those involved, the possibility of coercion or exploitation, and whether a referral to children's social care and the police is required. This policy is explained to boarders in age-appropriate terms during induction and reinforced through the pastoral and RSHE programme, so that boarders understand both the school's expectations and how to seek help.

Second, child on child abuse in a residential setting. The school recognises that sharing overnight accommodation materially increases the risk of child on child abuse, that victims cannot go home at the end of the day, and that abuse may occur at night, in bathrooms, changing areas and dormitories, and in the periods with the lightest supervision. The school therefore: risk assesses room allocations and reviews them regularly; ensures that boarders can express a preference about whom they share with, in accordance with National Minimum Standard 4.1; maintains staff presence and visibility during high-risk periods; ensures that every boarding building has at least one suitable member of staff sleeping in or on duty who is responsible for boarders and available to meet their needs during the night; ensures boarders know how to contact a member of staff at night and can do so easily; and treats any report of night time abuse as a matter of the highest urgency.

Third, significant gender imbalance. AJI is a single sex school for male students. The school recognises the risks that arise in a single sex residential environment, including the normalisation of misogynistic attitudes, the absence of everyday respectful contact with women and girls, and the potential for harmful sexual behaviour to develop unchecked. The school addresses this through explicit teaching about respectful relationships and the equal worth of women and girls, through the recruitment and visible presence of female staff in appropriate roles, through structured contact with the wider community, and by treating misogynistic language and content as a safeguarding concern under Section 6.13.

Fourth, harmful online content and the management of boarders' devices. The school's arrangements are set out at Section 6.19 and Section 9, and cover devices brought into school, content already downloaded onto a device, and access to harmful content over mobile data, which bypasses school filtering and monitoring.

Night time supervision and staffing

In accordance with National Minimum Standards 20.3 to 20.8, staff supervising boarders outside teaching time are sufficient in number, training and experience for the age, number and individual needs of boarders. Boarders are at all times the responsibility of an identified member of staff who is suitably qualified and experienced, and the school seeks continuity of staff so that boarders' relationships are not unduly disrupted. Staff know the whereabouts of boarders in their charge, or know how to establish it, at all times. Night staffing levels, waking and sleeping-in arrangements, and the process for summoning additional help are set out in the Boarding Handbook and reviewed annually.

Staff accommodation and boundaries

Residential staff accommodation is appropriately separated from boarders' accommodation and facilities are not shared. In accordance with National Minimum Standard 20.10, boarders do not have access to the private parts of staff residential accommodation other than in exceptional circumstances. Where such access occurs, a one-to-one situation is avoided and another adult is always present. Where any public or shared use space exists within staff accommodation, this is set out in writing and the school has a clear policy for managing its use safely. There is no inappropriate favouritism and no inappropriate one-to-one contact between staff and boarders.

Boarders' voice, complaints and advocacy

In accordance with National Minimum Standards 11, 13 and 14, boarders are actively encouraged to contribute their views, there are clear and accessible systems for them to do so, their views are considered in decisions about the running of boarding, and they are given feedback. Boarders are never penalised for raising a concern or a complaint in good faith. The school operates a separate, accessible process for boarders to raise their own complaints about boarding provision, in addition to the parental complaints procedure required by the Independent School Standards. The written record of complaints identifies those relating to boarding, records the action taken whether or not the complaint was upheld, includes complaints later withdrawn, and is reviewed for emerging patterns by the DSL and the governing body.

Boarders are provided with the contact details of the independent person referred to above, and with details of at least two child-specific support services such as Childline and the Children's Commissioner's Help at Hand service, in accordance with National Minimum Standard 11.5. Boarders are made aware of what advocacy support is available, how to access it, and any entitlement they may have, in accordance with National Minimum Standard 11.6.

Contact with parents and carers

The school facilitates arrangements so that boarders can contact their parents, carers and families in private and at a time suitable to both parties, taking account of time zones for international boarders. The school is sensitive to and complies with individual circumstances such as court ordered or agreed restrictions on contact. Arrangements for the collection and transport of boarders at the start and end of term, at exeat and during any temporary absence are agreed in writing with parents and carers, with particular care for international students.

Health, wellbeing and privacy in boarding

The school implements National Minimum Standard 7 in full, including access to local medical, dental and optometric services, engagement with specialist services such as CAMHS and services supporting victims of sexual abuse, clarity about who arranges routine and emergency healthcare appointments, safe storage and

recorded administration of medication, and suitable accommodation for boarders who are unwell, including toilet and washing facilities and appropriate privacy.

Fire, emergency and off-site safety

Fire drills are carried out at least once each term during boarding time, and at least one drill each year is carried out overnight unless the school has assessed that this would be detrimental to boarders' welfare, in accordance with National Minimum Standard 10.3. Additional drills are carried out for flexi boarders where the risk assessment requires it. Written contingency arrangements are in place for a major incident, including an overnight evacuation of the premises. Procedures are in place for boarders' safety when off site but in the care of the school.

Lodgings, host families and educational guardians

Where the school arranges lodgings or a host family for any student, it visits and assesses the accommodation before use, interviews the responsible adult, takes up references, obtains enhanced DBS certificates with a check of the children's barred list for every household member aged 16 or over, monitors the arrangement with checks at least termly, and provides written guidance to the host. A member of staff discusses the lodgings separately with each boarder at least once each term and records the boarder's assessment in writing. The school alerts the local authority to any arrangement that may constitute private fostering. Educational guardianship arrangements are managed in accordance with National Minimum Standard 22 and Section 16 of this policy.

Registration threshold

The school does not accommodate, and will not arrange accommodation for, any child for more than 295 days in a year. Any proposal that would cross that threshold would require registration as a children's home with Ofsted, and would be referred to the governing body and to the school's legal advisers before any commitment is made.

SECTION 34 – STUDENTS AGED 16 AND OVER, AND ADULT STUDENTS

AJI educates and accommodates students aged 16 and over, some of whom are, or become, 18 or over during their studies. This section sets out how the school manages the resulting safeguarding responsibilities.

- 34.1 Keeping Children Safe in Education applies to every student under the age of 18. A student aged 16 or 17 is a child in law and is entitled to the full protection of this policy, irrespective of the age of consent, of the fact that they may live independently, or of any cultural expectation that they be treated as an adult.
- 34.2 Students aged 16 and 17 may face particular risks, including exploitation in employment, financially motivated sexual extortion, coercion into marriage, county lines and criminal exploitation, homelessness following exclusion from the family home, and the assumption by adults around them that they can manage without support. Staff must not assume that an older student is less vulnerable.
- 34.3 Where a student aged 16 or 17 is, or is at risk of becoming, homeless, or is living independently from parents or guardians, the DSL will ensure that a referral is made to children's social care in accordance with Section 28, as children's services is the lead agency for these young people.

- 34.4 The National Minimum Standards for Boarding Schools apply to any boarder aged 18 or over who lives in the same accommodation as a boarder under 18. Consistent with the National Minimum Standards, students aged 18 and over who are not pupils but are being educated by the school will not be accommodated with pupils under 18. Where a boarder turns 18 during the course of a school year, the school will risk assess the accommodation arrangement and, wherever practicable, move that student to accommodation separate from students under 18, recording the decision and the rationale.
- 34.5 Adult students are not permitted to hold any supervisory, disciplinary or pastoral authority over students under 18 unless that role is formally assigned, defined in writing, subject to training, supervision and review, and subject to the appropriate DBS check where it constitutes regulated activity. Following the removal of the supervision exemption on 1 September 2026, a role that involves teaching, instructing, caring for or supervising children on more than three days in any 30 day period, or overnight, is regulated activity even where a member of staff supervises it. Adult students who assist in teaching, lead study circles, or hold prefect or monitor roles are therefore checked accordingly.
- 34.6 Any sexual, romantic or exploitative conduct by an adult student towards a student under 18 is a child protection matter and will be reported to the DSL, referred to children's social care and the police as appropriate, and managed under Section 17 where the adult student holds a position of trust.
- 34.7 Where a concern arises about a student aged 18 or over who has care and support needs and may be unable to protect themselves from abuse or neglect, the school will make a safeguarding adults referral to Bolton Council under section 42 of the Care Act 2014, and will follow the local safeguarding adults procedures. All staff are made aware that the school's duty of care does not end on a student's eighteenth birthday.
- 34.8 Where a student aged 18 or over is alleged to have caused harm to a student under 18, the school will apply this policy so far as it is applicable, will seek advice from the LADO where the individual holds a position of trust or a supervisory role, and will consider referral to the DBS where the harm test is met.

SECTION 35 – SAFEGUARDING IN RELIGIOUS INSTRUCTION AND THE RESIDENTIAL FAITH SETTING

The school's religious character and its residential model create specific safeguarding considerations. Naming them openly, and setting explicit expectations, is part of maintaining the open and positive safeguarding culture that inspectors look for.

- 35.1 Every person who teaches, trains, supervises or instructs a student in religion at AJI is in a position of trust in law, under the Sexual Offences Act 2003 as amended by the Police, Crime, Sentencing and Courts Act 2022. This applies to teachers, visiting scholars, imams, volunteers and adult students who lead study. Section 18 of this policy applies to them in full.
- 35.2 One-to-one religious instruction, including individual recitation and memorisation, takes place only in rooms that are visible from a corridor or communal space, with an unobstructed vision panel or an open door, at recorded times set out on a central timetable, and never in staff accommodation, bedrooms or other private areas. Senior leaders and the DSL carry out unannounced checks on these arrangements.

- 35.3 Corporal punishment is unlawful in all circumstances and no religious, cultural or disciplinary justification is recognised. This includes striking, pushing, pinching, pulling, throwing objects, and requiring a student to hold a painful, exhausting or humiliating posture. It also includes any sanction that involves the withholding of food, water, sleep, contact with family or access to a toilet. Any such allegation is treated as an allegation against a member of staff and reported to the LADO. Section 11 applies.
- 35.4 Staff must not use religious authority, scriptural interpretation or the concept of obedience to a teacher to discourage a student from disclosing abuse, to secure a student's silence, or to justify treatment that would otherwise be unacceptable. Students are taught explicitly, and repeatedly, that no adult, whatever their position, learning or standing, has the right to harm them, and that they will be believed and supported if they speak.
- 35.5 The school will not resolve child protection concerns internally, within the family, or through community mediation or elders. Where a safeguarding concern arises, the statutory route through the DSL to children's social care and the police is the only route. Reputation, community standing, family pressure, the standing of a scholar or the risk of scandal are never reasons to delay or withhold a referral. Any attempt to pressure the school, a member of staff or a student not to report will be recorded and, where it may amount to conduct intended to prevent a report under the Crime and Policing Act 2026, reported to the police.
- 35.6 The curriculum, including religious instruction, actively promotes the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs, and promotes the spiritual, moral, social and cultural development of students, as required by Part 2 of the Independent School Standards. Teaching does not present any group as inferior on the grounds of a protected characteristic, and staff challenge such views where they are expressed by students, by visitors or in materials.
- 35.7 Students who have arrived from overseas, who have limited spoken English, or who have limited experience of life in the United Kingdom, may be less able to recognise abuse, to know their rights or to know how to seek help. The school provides induction, translated or interpreted safeguarding information where needed, and access to an interpreter for any safeguarding conversation, and does not use family members or other students as interpreters in safeguarding matters.

SECTION 36 – SAFEGUARDING CULTURE, ASSURANCE AND REGULATORY COMPLIANCE

- 36.1 The governing body is responsible for ensuring that the school has an open and positive safeguarding culture, in which concerns are raised early and without fear, disagreement is welcomed, and leaders actively seek out weaknesses rather than waiting to be told. Ofsted judges safeguarding separately as either met or not met, and inspects the culture of safeguarding throughout the inspection, not only the paperwork.
- 36.2 The school demonstrates compliance with Part 3 of the Education (Independent School Standards) Regulations 2014, in particular the requirement that the proprietor ensures arrangements are made to safeguard and promote the welfare of pupils and that those arrangements have regard to Keeping Children Safe in Education, and with the National Minimum Standards for Boarding Schools, against which its boarding provision is inspected.
- 36.3 The school completes an annual safeguarding self-evaluation and audit, benchmarked against Keeping Children Safe in Education 2026, the National Minimum Standards, and the Bolton safeguarding partnership's section 175 and 157 audit where applicable. The outcome, together with a dated and

owned action plan, is presented to the full governing body, and progress against the action plan is reviewed termly.

- 36.4 The governing body monitors safeguarding through: termly reports from the DSL covering the volume, type and outcome of concerns, referrals made and their outcomes, low-level concerns and any patterns, allegations and LADO contacts, missing boarder incidents, use of physical intervention, complaints from boarders, filtering and monitoring alerts, and training compliance; the safeguarding governor's termly visits and independent scrutiny of the single central record; and the direct views of students and staff obtained through survey and conversation.
- 36.5 The school will notify the Department for Education, Ofsted and, where relevant, the Charity Commission of any serious safeguarding incident, in accordance with its regulatory and charitable reporting obligations, and will co-operate fully with any inspection, investigation or review.
- 36.6 The school will act promptly on any recommendation arising from an inspection, an audit, a serious incident, a local child safeguarding practice review or a national review, and will record what changed as a result.

APPENDIX 1

APPENDIX 1A – RECOGNITION & IDENTIFICATION OF ABUSE

Definitions taken from Working Together to Safeguard Children (2026), Appendix A

What is abuse?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.

APPENDIX 1B – INDICATORS OF ABUSE

Caution should be used when referring to lists of signs and symptoms of abuse. Although the signs and symptoms listed below may be indicative of abuse, there may be alternative explanations. In assessing the circumstances of any child any of these indicators should be viewed within the overall context of the child's individual situation including any disability.

APPENDIX 1C – EMOTIONAL ABUSE

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Emotional abuse is difficult to:

- define
- Identify/recognise – prove

Emotional abuse is chronic and cumulative and has a long-term impact. Indicators may include:

- Physical, mental and emotional development lags.
- Sudden speech disorders.
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc').
- Overreaction to mistakes.
- Extreme fear of any new situation.
- Inappropriate response to pain ('I deserve this').
- Unusual physical behaviour (rocking, hair twisting, self-mutilation) – consider within the context of any form of disability such as autism. In line with the SEND Code of Practice and KCSIE 2026, the school uses the term **autism** (rather than "autism spectrum disorder") when referring to children with this condition.
- Extremes of passivity or aggression.
- Children suffering from emotional abuse may be withdrawn and emotionally flat. One reaction is for the child to seek attention constantly or to be over-familiar. Lack of self-esteem and developmental delay are again likely to be present.
- Babies – feeding difficulties, crying, poor sleep patterns, delayed development, irritable, non-cuddly, apathetic, non-demanding.
- Toddler/Preschool – head banging, rocking, bad temper, 'violent', clingy. From overactive to apathetic, noisy to quiet. Developmental delay – especially language and social skills.
- School age – Wetting and soiling, relationship difficulties, poor performance at school, non-attendance, anti-social behaviour, feels worthless, unloved, inadequate, frightened, isolated, corrupted and terrorised.
- Adolescent – depression, self-harm, substance abuse, eating disorder, poor self- esteem, oppositional, aggressive and delinquent behaviour.
- Children may be underweight and/or stunted.
- Children may fail to achieve milestones, fail to thrive, experience academic failure or under achievement.
- Also consider a child's difficulties in expressing their emotions and what they are experiencing and whether this has been impacted on by factors such as age, language barriers or disability.

APPENDIX 1D – NEGLECT

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment), failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision (including the use

of inadequate caregivers) or failure to ensure access to appropriate medical care or treatment. It may also neglect of, or unresponsiveness to, a child's basic emotional needs.

There are occasions when nearly all parents find it difficult to cope with the many demands of caring for children, but this does not mean that their children are being neglected. Neglect involves ongoing failure to meet a child's needs.

Neglect can often fit into six forms which are:

- Medical – the withholding of medical care including health and dental.

- Emotional – lack of emotional warmth, touch and nurture.
- Nutritional – through lack of access to a proper diet which can affect in their development.
- Educational – failing to ensure regular school attendance that prevents the child reaching their full potential academically.
- Physical – failure to meet the child’s physical needs.
- Lack of supervision and guidance – meaning the child is in dangerous situations without the ability to assess the danger.

Common Concerns:

With regard to the child, some of the regular concerns are:

- The child’s development in all areas including educational attainment
- Cleanliness
- Health
- Children left at home alone and accidents related to this
- Taking on unreasonable care for others
- Young carers

Neglect can often be an indicator of further maltreatment and is often identified as an issue in serious case reviews as being present in the lead up to the death of the child or young person. It is important to recognise that the most frequent issues and concerns regarding the family in relation to neglect relate to parental capability. This can be a consequence of:

- Poor health, including mental health or mental illness
- Disability, including learning difficulties
- Substance misuse and addiction
- Domestic violence

School staff need to consider both acts of commission (where a parent/carer deliberately neglects the child) and acts of omission (where a parent’s failure to act is causing the neglect). This is a key consideration with regard to school attendance where parents are not ensuring their child attends school regularly.

Many of the signs of neglect are visible. However, school staff may not instinctively know how to recognise signs of neglect or know how to respond effectively when they suspect a pupil is being neglected. Children spend considerable time in school, so staff have opportunities to identify patterns over time and recognise and respond to concerns about their safety and welfare. All concerns should be recorded and reflected upon, not simply placed in a file.

Here are some signs of possible neglect:

Physical signs:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Emaciation
- Untreated medical problems
- The child seems underweight and is very small for their age
- The child is poorly clothed, with inadequate protection from the weather
- Neglect can lead to failure to thrive, manifest by a fall away from initial centile lines in weight, height and head circumference. Repeated growth measurements are crucially important
- Signs of malnutrition include wasted muscles and poor condition of skin and hair. It is important not to miss an organic cause of failure to thrive. If this is suspected, further investigations will be required
- Infants and children with neglect often show rapid growth catch-up and improved emotional response in a hospital environment

- Failure to thrive through lack of understanding of dietary needs of a child or inability to provide an appropriate diet; or may present with obesity through inadequate attention to the child's diet
- Being too hot or too cold – red, swollen and cold hands and feet or they may be dressed in inappropriate clothing
- Consequences arising from situations of danger – accidents, assaults, poisoning
- Unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor conditions
- Health problems associated with lack of basic facilities such as heating
- Neglect can also include failure to care for the individual needs of the child including any additional support the child may need as a result of any Disability Behavioural Signs:
- No social relationships
- Compulsive scavenging
- Destructive tendencies
- If they are often absent from school for no apparent reason
- If they are regularly left alone, or in charge of younger brothers or sisters
- Lack of stimulation can result in developmental delay, for example, speech delay, and this may be picked up opportunistically or at formal development checks
- Craving attention or ambivalent towards adults, or may be very withdrawn
- Delayed development and failing at school (poor stimulation and opportunity to learn)
- Difficult or challenging behaviour

APPENDIX 1E – PHYSICAL ABUSE

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

When dealing with concerns regarding physical abuse, refer any suspected non-accidental injury to the Designated Safeguarding Lead without delay so that they are able to seek appropriate guidance from the police and/or Children's Services in order to safeguard the Child. Staff must be alert to:

- Unexplained recurrent injuries or burns; improbable excuses or refusal to explain injuries.
- Injuries that are not consistent with the story: too many, too severe, wrong place or pattern, child too young for the activity described.
-

Physical signs:

- Bald patches
- Bruises, black eyes and broken
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- Scalds and burns
- General appearance and behaviour of the child may include:
- Concurrent failure to thrive measure height, weight and, in the younger child, head circumference.
- Frozen watchfulness: impassive facial appearance of the abused child who carefully tracks the examiner with his eyes.
- Bruising:
- Bruising patterns can suggest gripping (finger marks), slapping or beating with an object.
- Bruising on the cheeks, head or around the ear and black eyes can be the result of non-accidental injury.
- Other injuries:
- Bite marks may be evident from an impression of teeth.

- Small circular burns on the skin suggest cigarette burns.
- Scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically.
- Red lines occur with ligature injuries.
- Retinal haemorrhages can occur with head injury and vigorous shaking of the baby.
- Tearing of the frenulum of the upper lip can occur with force-feeding. However, any injury of this type must be assessed in the context of the explanation given, the child's developmental stage, a full examination and other relevant investigations as appropriate.
- Fractured ribs: rib fractures in a young child are suggestive of non-accidental injury
- Other fractures: spiral fractures of the long bones are suggestive of non-accidental injury

Behavioural signs:

- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress for gym
- Chronic running away
- Fear of medical help or examination
- Self-destructive tendencies
- Fear of physical contact – shrinking back if touched
- Admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study')
- Fear of suspected abuser being contacted
- Injuries that the child cannot explain or explains unconvincingly
- Become sad, withdrawn or depressed
- Having trouble sleeping
- Behaving aggressively or be disruptive
- Showing fear of certain adults
- Having a lack of confidence and low self-esteem
- Using drugs or alcohol
- Repetitive pattern of attendance: recurrent visits, repeated injuries
- Excessive compliance
- Hyper-vigilance

APPENDIX 1F – SEXUAL ABUSE

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-

penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children in looking at or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Sexual abuse is usually perpetrated by people who are known to and trusted by the child – e.g. relatives, family friends, neighbours, people working with the child in school or through other activities.

Characteristics of child sexual abuse:

- It is usually planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic.
- Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent. This can be done in person or via the internet through chatrooms and social networking sites.
- Grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives. Again, this can be done in person or via the internet through chatrooms and social networking sites.

In young children behavioural changes may include:

- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys.
- Being overly affectionate – desiring high levels of physical contact and signs of affection such as hugs and kisses.
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or childminder.
- They may start using sexually explicit behaviour or language, particularly if the behaviour or language is not appropriate for their age.
- Starting to wet again, day or night/nightmares.

In older children behavioural changes may include:

- Extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia.
- Personality changes such as becoming insecure or clinging.
- Sudden loss of appetite or compulsive eating.
- Being isolated or withdrawn.
- Inability to concentrate.
- Become worried about clothing being removed.
- Suddenly drawing sexually explicit pictures.
- Trying to be 'ultra-good' or perfect; overreacting to criticism.
- Genital discharge or urinary tract infections.
- Marked changes in the child's general behaviour, for example, they may become unusually quiet and withdrawn, or unusually aggressive, or they may start suffering from what may seem to be physical ailments, but which can't be explained medically.
- The child may refuse to attend school or start to have difficulty concentrating so that their schoolwork is affected.
- They may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities.
- The child may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person.
- Children who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour.
- Low self-esteem, depression and self-harm are all associated with sexual abuse.

Physical signs and symptoms for any age child could be:

- Medical problems such as chronic itching, pain in the genitals, venereal diseases.
- Stomach pains or discomfort walking or sitting.
- Sexually transmitted infections.

- Any features that suggest interference with the genitalia. These may include bruising, swelling, abrasions or tears.
- Soreness, itching or unexplained bleeding from penis, vagina or anus.
- Sexual abuse may lead to secondary enuresis or faecal soiling and retention.
- Symptoms of a sexually transmitted disease such as vaginal discharge or genital warts, or pregnancy in adolescent girls.
-

APPENDIX 1G – SEXUAL ABUSE BY YOUNG PEOPLE

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children. Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educational inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

APPENDIX 1H – ASSESSMENT

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

Equality – Consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies.

Consent – Agreement including all the following:

- Understanding that is proposed based on age, maturity, development level, functioning and experience.
- Knowledge of society’s standards for what is being proposed.
- Awareness of potential consequences and alternatives.
- Assumption that agreements or disagreements will be respected equally.
- Voluntary decision.
- Mental competence.

Coercion – The young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

APPENDIX 2

APPENDIX 2A – CHILD SEXUAL EXPLOITATION (CSE)

Safeguarding and promoting the welfare of children includes protecting children from abuse, neglect, and exploitation. Exploitation involves situations where children are manipulated or coerced into activities that benefit others financially, sexually, or in any other way.

‘Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity, (a) in exchange for something the victim needs or wants, and/or (b), for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology’. (DfE – February 2017)

The definition and further guidelines can be found in the DfE document: Child sexual exploitation – Definition and a guide for practitioners.

Who is at risk?

Child sexual exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.

The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face, and it can happen online. It can also occur between young people.

In all its forms, CSE is child abuse and should be treated as a child protection issue.

APPENDIX 2B – WARNING SIGNS AND VULNERABILITIES CHECKLIST

The evidence available points to several factors that can increase a child’s vulnerability to being sexually exploited. The following are typical **vulnerabilities in children prior to abuse**:

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality).
- History of abuse (including familial child sexual abuse, risk of forced marriage, risk of ‘honour based’ violence, physical and emotional abuse and neglect).
- Recent bereavement or loss.
- Gang association either through relatives, peers or intimate relationships (in cases of gang associated CSE only).
- Attending school with young people who are sexually exploited.
- Learning disabilities.
- Unsure about their sexual orientation or unable to disclose sexual orientation to their families.
- Friends with young people who are sexually exploited.
- Homeless.
- Lacking friends from the same age group.
- Living in a gang neighbourhood.
- Living in residential care.
- Living in a hostel, bed and breakfast accommodation or a foyer.
- Low self-esteem or self-confidence.

- Young carer.

The following signs and behaviour are generally seen in children who are already being sexually exploited:

- Missing from home or care.
- Physical injuries.
- Drug or alcohol misuse.
- Involvement in offending.
- Repeat sexually transmitted infections, pregnancy and terminations.
- Absent from school.
- Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites.
- Estranged from their family.
- Receipt of gifts from unknown sources.
- Recruiting others into exploitative situations.
- Poor mental health.
- Self-harm.
- Thoughts of or attempts at suicide.

Evidence shows that any child displaying several vulnerabilities from the above lists should be considered to be at high risk of sexual exploitation.

All schools should ensure that there is a dedicated lead person with responsibility for implementing local guidance in respect of Child Sexual Exploitation. This would normally be the DSL.

The DSL must ensure they are aware of the guidance on Child Sexual Exploitation on BSCB Website.

The DSL must ensure that all staff are aware of signs and symptoms of CSE and know that these must be reported and recorded as child protection concerns. The DSL must follow the Bolton Safeguarding for dealing with issues of CSE, including completion of the screening tool.

APPENDIX 3

APPENDIX 3A – EFFECTS OF DOMESTIC ABUSE ON CHILDREN AND YOUNG PEOPLE

The impact of domestic abuse on the quality of a child's or young person's life is very significant. Children and young people who live with domestic abuse are at increased risk of behavioural problems, emotional trauma, and mental health difficulties in adult life.

KCSIE 2026 reiterates the Domestic Abuse Act 2021 that domestic abuse:

- can be psychological, physical, sexual, financial, or emotional
- can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships. This is explored further below.

The impact of domestic abuse on children and young people can be wide-ranging and may include effects in any or all of the following areas:

1. **Physical:** Children and young people can be hurt either by trying to intervene and stopping the violence or by being injured themselves by the abuser. They may develop self-harming behaviour or eating disorders. Their health could be affected, as they may not be being cared for appropriately. They may have suicidal thoughts or try to escape or blank out the abuse by using drugs, alcohol or by running away.

2. **Sexual:** There is a high risk that children and young people will be abused themselves where there is domestic abuse. In homes where living in fear is the norm, and situations are not discussed, an atmosphere of secrecy develops, and this creates a climate in which sexual abuse could occur. In addition to this, children and young people may sometimes be forced to watch the sexual abuse of their mother/carer. This can have long-lasting effects on the sexual and emotional development of the child/young person.
3. **Economic:** The parent or carer of the child or young person may have limited control over the family finances. Therefore, there might be little or no money available for extra-curricular activities, clothing or even food, impacting on their health and development.
4. **Emotional:** Children and young people will often be very confused about their feelings – for example, loving both parents/carers but not wanting the abuse to continue. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many children and young people feel guilty, believing that the abuse is their fault. They are often pessimistic about their basic needs being met and can develop suicidal thoughts. Some children and young people may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.
5. **Isolation:** Children and young people may become withdrawn and isolated; they may not be allowed out to play; and if there is abuse in the home, they are less likely to invite their friends around. Schooling may be disrupted in many ways, and this may contribute to their growing isolation. They may frequently be absent from school as they may be too scared to leave their mother alone. They may have to move away from existing friends and family – e.g. into a refuge or other safe or temporary accommodation.
6. **Threats:** Children and young people are likely to have heard threats to harm their mother/father. They may have been directly threatened with harm or heard threats to harm their pet. They also live under the constant and unpredictable threat of violence, resulting in feelings of intimidation, fear and vulnerability, which can lead to high anxiety, tension, confusion and stress.

This clearly highlights that living with domestic abuse has a significant impact on a child's ability to achieve the outcomes around impairment of their health and development or that may be at significant harm. In this regard AJI will seek advice from the LA around any S17 or S47 enquiries as advised by social care.

APPENDIX 3B – WHAT YOU MIGHT SEE IN SCHOOL

- Unexplained absences or lateness – either from staying at home to protect their parents or hide their injuries, or because they are prevented from attending school.
- Children and young people attend school when ill rather than staying at home.
- Children and young people are not completing their homework, or making constant excuses, because of what is happening at home.
- Children and young people who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home.
- Children and young people display difficulties in their cognitive and school performance.
- Children and young people whose behaviour and personality changes dramatically.
- Children and young people who become quiet and withdrawn and have difficulty in developing positive peer relations.
- Children and young people displaying disruptive behaviour or acting out violent thoughts with little empathy for victims.
- Children and young people who are no trouble at all.

This list is not exhaustive – this is intended to give you an idea of some of the types of behaviour that could be presented.

APPENDIX 3C – WHAT SCHOOLS CAN DO

Schools can create an environment which both promotes their belief and commitment that domestic abuse is not acceptable, and that they are willing to discuss and challenge it.

For many victims, the school might be the one place that they visit without their abusive partner. It would help if schools displayed posters or had cards/pens available with information about domestic abuse and contact details for useful agencies: for example, NSPCC **0808 800 5000** and Child Line **0800 11 11**; Parent line **0808 800 2222**.

Greater Manchester Constabulary – Police Domestic Abuse Units 101.

Bolton Social care and/or any Social Care authorities of the town where the child may live.

Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which male power is used to control women. The underlying attitudes which legitimate and perpetuate violence against women should be challenged by schools as part of the whole school ethos.

Schools can support individual children and young people by:

- Introducing a **whole-school philosophy** that domestic abuse is unacceptable.
- **Responding to disclosures and potential child protection concerns**; Recognising that domestic abuse and forced marriage may be a child protection concern; policies and procedures must include domestic abuse.
- **Giving emotional support** – The child or young person might need referral to a more specialist service or need additional support to complete coursework, exams etc.
- **Facilitating a peer support network** – Children and young people can become isolated but often welcome talking to friends about their problems.
- **Offering practical support** – If children or young people are new to the school, they may not yet have a uniform, they may also need financial help with extra-curricular activities, or they may be unfamiliar with the syllabus, the area, where to hang out, etc.
- **Providing somewhere safe and quiet** to do their homework or just to sit and think.
- **Improving the self-esteem and confidence** of children and young people by offering them opportunities to take on new roles and responsibilities.
 - offering tasks which are achievable and giving praise and encouragement.
 - monitoring their behaviour and setting clear limits.
 - criticising the action, not the person.
 - helping them to feel a sense of control in their school lives.
 - involving them in decision making.
 - helping them to be more assertive.
 - respecting them as individuals.
 - encouraging involvement in extracurricular activities.
 -

From the expect respect education toolkit – women’s aid operation encompass.

APPENDIX 3D – OPERATION ENCOMPASS

Operation Encompass is a police and education early information sharing partnership enabling schools to offer immediate support for children and young people experiencing domestic abuse. Information is shared by the police with a school’s trained Key Adult (Designated Safeguarding Lead) prior to the start of the next

school day after officers have attended a domestic abuse incident, thus enabling appropriate support to be given, dependent upon the needs and wishes of the child. Children experiencing domestic abuse are negatively impacted by this exposure; domestic abuse has been identified as an Adverse Childhood Experience and can lead to emotional, physical and psychological harm. Operation Encompass aims to mitigate this harm by enabling immediate support, making a child's day better and giving them a better tomorrow.

The DSL's responsibility – the DSL should:

- View the Operation Encompass website (www.operationencompass.org) for further information.
- Ensure the Safeguarding Education Adviser has up to date contact information.
- Ensure the Operation Encompass referral record document is retained in the same way as other child protection documents, in a secure place.
- Identify and brief a colleague who can deputise in his/her absence.
- Ensure that all teaching staff are aware of Operation Encompass and understand the confidential nature of any information passed to them and that this information must be treated in the same way as any other child protection information.
- Inform parents that the school is part of Operation Encompass (using the template letter supplied).
- Inform the Governing Body that the school is part of Operation Encompass and the Governor with responsibility for safeguarding should have a working knowledge of the principles.
- Include details of Operation Encompass in the school prospectus and on the school website to ensure that all new parents are informed of the school's involvement.
- Consider displaying Operation Encompass posters around the school.
-

On receiving a Domestic Abuse notification, the DSL should:

- complete the Operation Encompass referral record.
- notify class teachers or year leaders.
- If there's no change to the child's behaviour – just monitor and log the DA.
- If the child displays poor behaviour choices / seems upset / withdrawn, offer the relevant support needed.

Bear in mind

- Victims of the incident may be anxious that the information will be shared inappropriately.
- Notification may not give details as to which parent is the perpetrator / victim – any disclosure to the 'wrong' parent could heighten risk.
- Need to be aware who is 'connected' to the child – e.g. TA / lunchtime supervisor may be the child's relative / friend of the family.
- **Inappropriate sharing of information could heighten the risk for the victim and/or the child.**

APPENDIX 4

APPENDIX 4A – FORCED MARRIAGE – A FORM OF DOMESTIC ABUSE AND A CRIME IN ENGLAND AND WALES

Forced Marriage should be recognised as a human rights abuse – and should always invoke child protection procedures within the school.

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

A forced marriage is not the same as an arranged marriage. In an arranged marriage the families take a leading role in choosing the marriage partner. The marriage is entered into freely by both people.

APPENDIX 4B – WARNING SIGNS

Warning signs can include a sudden drop in performance, truancy from lessons and conflicts with parents over continuation of the student's education.

There may be excessive parental restrictions and control, a history of domestic abuse within the family, or extended absence through sickness or overseas commitments. Students may also show signs of depression or self-harming, and there may be a history of older siblings leaving education early to get married.

APPENDIX 4C – THE JUSTIFICATIONS

Most cases of forced marriage in the UK involve South Asian families. This is partially a reflection of the fact that there is a large established South Asian population in the UK. It is clear, however, that forced marriage is not a solely South Asian phenomenon. There have been cases involving families from East Asia, the Middle East, Europe and Africa.

Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas, or a British Citizen being sent abroad. Parents who force their children to marry often justify it as protecting them, building stronger families and preserving cultural or religious traditions. They may not see it as wrong.

Forced marriage can never be justified on religious grounds: every major faith condemns it and freely given consent is a prerequisite of Christian, Jewish, Hindu, Muslim and Sikh marriage.

APPENDIX 4D – CULTURE

Often parents believe that they are upholding the cultural traditions of their home countries, when in fact, practices and values there have changed. Some parents come under significant pressure from their extended families to get their children married.

APPENDIX 4E – THE LAW

Sexual intercourse without consent is rape, regardless of whether this occurs within the confines of a marriage. A girl who is forced into marriage is likely to be raped and may be raped until she becomes pregnant.

In addition, the Forced Marriage Civil Protection Act (2007) makes provision for protecting children, young people and adults from being forced into marriage without their full and free consent through Forced

Marriage Protection Orders. Breaching a Forced Marriage Protection Order is a criminal offence. The Anti-Social Behaviour, Crime and Policing Act (2014) makes it a criminal offence, with effect from 16th June 2014, to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the marriage takes place);
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured into it or not).

APPENDIX 4F – WHAT TO DO IF A STUDENT SEEKS HELP

- The student should be seen immediately in a private place, where the conversation cannot be overheard.
- The student should be seen on her own, even if she attends with others.
- Develop a safety plan in case the student is seen i.e. prepare another reason why you are meeting.
- Explain all options to the student and recognise and respect her wishes. If the student does not want to be referred to Children's Services, you will need to consider whether to respect the student's wishes or whether the student's safety requires further action to be taken. If you take action against the student's wishes you must inform the student.
- Establish whether there is a family history of forced marriages, i.e. siblings forced to marry.
- Advise the student not to travel overseas and discuss the difficulties she may face.
- Seek advice from the Forced Marriage Unit.
- Liaise with Police and Children's Services to establish if any incidents concerning the family have been reported.
- Refer to Police if there is any suspicion that there has been a crime or that one may be committed.
- Refer the student with her consent to the appropriate local and national support groups, and counselling services.

APPENDIX 4G – WHAT TO DO IF THE STUDENT IS GOING ABROAD IMMINENTLY

The Forced Marriage Unit advises education professionals to gather the following information if at all possible — it will help the unit to locate the student and to repatriate her:

- A photocopy of the student's passport for retention — encourage her to keep details of her passport number and the place and date of issue.
- As much information as possible about the family (this may need to be gathered discreetly).
- Full name and date of birth of student under threat.
- Student's father's name.
- Any addresses where the student may be staying overseas.
- Potential spouse's name.
- Date of the proposed wedding.
- The name of the potential spouse's father is known.
- Addresses of the extended family in the UK and overseas.

Specific information

It is also useful to take information that only the student would know, as this may be helpful during any interview at an embassy or British High Commission, in case another person of the same age is produced pretending to be the student.

Professionals should also take details of any travel plans and people likely to accompany the student. Note also the names and addresses of any close relatives remaining in the UK and a safe means to contact the student, for example, a secret mobile telephone that will function abroad.

APPENDIX 4H – FORCED MARRIAGE: WHAT EDUCATORS SHOULD NOT DO:

- Treat such allegations merely as domestic issues and send the student back to the family home.
- Ignore what the student has told you or dismiss the need for immediate protection.
- Approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to your concern and may place the student in danger.
- Contact the family in advance of any enquiries by the Police, Children's Services or the Forced Marriage Unit, either by telephone or letter.
- Share information outside child protection information sharing protocols without the express consent of the student.
- Breach confidentiality except where necessary in order to ensure the student's safety.
- Attempt to be a mediator.

APPENDIX 5

APPENDIX 5A – FEMALE GENITAL MUTILATION (FGM) & BREAST IRONING – A FORM OF HUMAN RIGHTS ABUSE

What is FGM?

FGM includes procedures that intentionally alter or injure the female genital organs for non-medical reasons.

There are four known types of FGM, all of which have been found in the UK:

Type 1 – Clitoridectomy: partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris).

Type 2 – Excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the 'lips' that surround the vagina).

Type 3 – Infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris.

Type 4 – Other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterising the genital area.

FGM is sometimes known as 'female genital cutting' or 'female circumcision'. Communities tend to use local names for this practice, including 'sunna'.

Why is FGM carried out?

It is believed that:

- It brings status and respect to the girl and that it gives a girl social acceptance, especially for marriage.
- It preserves a girl's virginity/chastity.
- It is part of being a woman as a rite of passage.
- It upholds the family honour.
- It cleanses and purifies the girl.
- It gives the girl and her family a sense of belonging to the community.
- It fulfils a religious requirement believed to exist.
- It perpetuates a custom/tradition.
- It helps girls and women to be clean and hygienic.
- It is cosmetically desirable.
- It is mistakenly believed to make childbirth safer for the infant.

Religion is sometimes given as a justification for FGM, for example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM, and some women have been told that having FGM will make them 'a better Muslim'. However, senior Muslim clerics at an international conference on FGM in Egypt in 2006 pronounced that FGM is not Islamic, and the London Central Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

Within which communities is FGM known to be practised?

According to the Home Office it is estimated that up to 24,000 girls under the age of 15 are at risk of FGM. UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leonean, Egyptian, Nigerian and Eritrean, as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

Obviously, this not to say that all families from the communities listed above practise FGM, and many parents will refuse to have their daughters subjected to this procedure. However, in some communities a great deal of pressure can be put on parents to follow what is seen as a cultural or religious practice.

Is FGM harmful?

FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short and long-term effects on physical and psychological health.

FGM is carried out on children between the ages of 0 and 15, depending on the community in which they live. It is often carried out without any form of sedation and without sterile conditions. The girl or young woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear and feelings of abandonment.

Where the vagina is cut and then sewn up, only a very small opening may be left. This is often seen as a way to ensure that when the girl enters marriage, she is a virgin. In some communities the mother of the future husband and the girl's own mother will take the girl to be cut open before the wedding night.

Repeat urinary tract infections are a common problem for women who have undergone FGM, and for some, infections come from menstruation being restricted. Many women have problems during pregnancy and childbirth. The removal of the clitoris denies women physical pleasure during sexual activity and some groups will practise complete removal to ensure chastity.

Is it illegal?

FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries, including the UK. The Female Genital Mutilation Act (2003) came into force in 2004. The act makes it illegal to:

- Practise FGM in the UK.
- Take girls who are British nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in that country.
- Aid and abet, counsel or procure the carrying out of FGM abroad. The offence carries a penalty of up to 14 years in prison, and/or a fine.
-

APPENDIX 5B – SIGNS, SYMPTOMS AND INDICATORS

The following list of possible signs and indicators are not diagnostic but are offered as a guide as to what kind of things should alert professionals to the possibility of FGM.

Things that may point to FGM happening:

- A child talking about getting ready for a special ceremony.
- A family arranging a long break abroad.
- A child's family being from one of the 'at-risk' communities for FGM (see above).

- Knowledge that an older sibling has undergone FGM.
- A young person talks of going abroad to be 'cut' or get ready for marriage.
-

Things that may indicate a child has undergone FGM:

- Prolonged absence from school or other activities.
- Behaviour changes on return from a holiday abroad, such as the child being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between their legs.
- Mentioning something somebody did to them that they are not allowed to talk about.
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinary tract infection.
- Disclosure.

APPENDIX 5C – MANDATORY REPORTING DUTY

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime

Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

Further information on when and how to make a report can be found in the following Home Office guidance: 'Mandatory Reporting of Female Genital Mutilation – Procedural Information' (October 2015). Two updated guidance documents about FGM have been published and can be found on the links below.

1. Female Genital Mutilation: Guidance for schools (National FGM Centre):
<http://nationalfgmcentre.org.uk/wp-content/uploads/2019/06/FGM-Schools-Guidance- National-FGM-Centre.pdf>
2. Female genital mutilation: the facts (Home Office):
<https://www.gov.uk/government/publications/female-genital-mutilation-leaflet>
- 3.

APPENDIX 5D – WHAT IS BREAST IRONING?

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa.

APPENDIX 5E – WHY DOES BREAST IRONING HAPPEN?

The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping. Consequently, breast ironing is more prevalent in Cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing.

APPENDIX 5F – BREAST IRONING IS PHYSICAL ABUSE

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-Based Violence. Although, countries where breast ironing is prevalent, have ratified the African Charter on Human Rights to prevent harmful traditional practices. It is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

APPENDIX 5G – BREAST IRONING IN THE UK

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1000 girls at risk. Keeping Children Safe in Education (2020) mentions breast ironing on page 87, as part of the section on so-called 'Honour-Based Violence'. Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible. Schools need to know the risk level within their communities and tackle the risk as appropriate.

APPENDIX 5H – WHAT SHOULD SCHOOLS DO?

Where schools have a concern about a child, they should contact Children's Social Care Services. If the concerns are based on more concrete indicators, i.e. the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister. Schools should make a child protection referral and inform the Police as required by the mandatory reporting duty. Schools should not:

- Contact the parents before seeking advice from Children's Social Care.
- Make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM or Breast Ironing as a form of abuse, however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM and Breast Ironing may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM or Breast Ironing.

APPENDIX 5I – THE 'ONE CHANCE' RULE

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance' of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

APPENDIX 6

APPENDIX 6A – SHARING NUDES AND SEMI-NUDES (PREVIOUSLY KNOWN AS SEXTING)

What is 'sharing nudes and semi-nudes'?

'Sharing nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing devices via services like Apple's Airdrop which works offline

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'pics'

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships as well as between those who are not in a relationship.

It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- Children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- Children and young people digitally manipulate an image of a young person into an existing nude online
- Images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts

Nude or semi-nude images, videos or live streams may include more than one child or young person. Creating and sharing nudes and semi-nudes of under 18-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children and young people complex. There are also a range of risks which need careful management from those working in education settings.

Many professionals may refer to 'nudes and semi-nudes' as:

- Youth produced sexual imagery or 'youth involved' sexual imagery
- Indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18
- 'Sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- Image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes

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

Incidents can broadly be divided into two categories:

AGGRAVATED: Incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can further be sub-categorised into:

- ☐ **Adult-involved:** Adult offenders attempt to develop relationships by grooming children and young people, in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family friends, relatives, community members or contacted via the internet. The images may be solicited by adult offenders
- ☐ **Youth only – intent to harm:** These cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people
- ☐ **Youth only – reckless misuse:** No intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly, and a victim may have been harmed as a result.

EXPERIMENTAL: Incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can further be sub-categorised into:

- **Romantic:** Incidents in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair
- **‘Sexual Attention Seeking’:** The phrase ‘Sexual Attention Seeking’ is taken directly from the typology however it is important to note that incidents within this category can be a part of normal childhood. A child or young person should not be blamed for taking and sharing their image
- **Other:** Cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (Age 9 or younger) who did not appear to have sexual motives

The Law – Much of the complexity in responding to youth produced sexual imagery is due to its legal status. Making, possessing and distributing any imagery of someone under 18 which is ‘indecent’ is illegal. This includes imagery of yourself if you are under 18. ‘Indecent’ is not defined in legislation. Indecent imagery does not always mean nudity; however, images are likely to be defined as such if they meet one or more of the following criteria:

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

The law criminalising indecent images of children was created long before mass adoption of the internet, mobiles and digital photography. It was also created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children and young people. Despite this, children and young people who share nudes and semi-nudes of themselves, or peers, are breaking the law.

The National Police Chiefs Council (NPCC) has made clear that incidents involving sharing of nudes and semi-nudes should have an immediate focus on safeguarding children. Schools may respond to incidents without involving the police. Where the police are notified of incidents of sharing nudes and semi-nudes they are obliged, under the Home Office Counting rules and National Crime Recording Standards, to record the incident on their crime systems. The incident will be listed as a ‘crime’ and the child or young person involved may be listed in relation to it. **This is not the same as having a criminal record.**

Every ‘Crime’ recorded on police systems has to be assigned an outcome from a predefined list of outcome codes. As of January 2016, the Home Office launched a new outcome code (Outcome 21) to help formalise the discretion available to the police when handling crimes such as sharing nudes and semi-nudes. This means that even though a young person has broken the law, and the police could provide evidence that they have done so, the police can record that they chose not to take further action as it was not in the public interest.

Action to take in the case of an incident of sharing nudes and semi-nudes

When an incident involving nudes and semi-nudes comes to the attention of any member of staff in school:

- The incident should be referred to the DSL (or equivalent) as soon as possible
- The DSL (or equivalent) should hold an initial review meeting with appropriate staff. This may include staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- There should be subsequent interviews with the children or young people (if appropriate)

- Parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm
- A referral should be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or at risk of immediate harm at any point in the process

It is important to note that a disclosure may not be a single event, and the child and young person may share further information at a later stage therefore multiple reviews and risk assessments may be needed depending on the situation

Any direct disclosures by a child or young person should be taken seriously. A child or young person who discloses they are the subject of an incident of sharing nudes and semi-nudes is likely to be embarrassed and worried about the consequences. It is likely that disclosure in the school is a last resort, and they may have already tried to resolve the issue themselves

When a disclosure is made, the member (or members) of staff should ensure the child is feeling comfortable and appropriate and sensitive questions are asked, in order to minimise further distress or trauma to them.

In cases where nudes and semi-nudes have been shared, AJI will follow guidance given to schools and colleges by the UK Council for internet Safety (UKCIS) [Sharing nudes and semi-nudes \(December 2020\)](#)

If there is an indecent image of a child on a website or a social networking site, then you should report the image to the site hosting it. In the case of an incident involving a child or young person where you feel that they may be at risk of abuse then you should report the incident directly to the NCA Child Exploitation and Online Protection (CEOP) <https://www.ceop.police.uk/safety-centre>, so that law enforcement can make an assessment, expedite the case with the relevant provider and ensure that appropriate action is taken to safeguard the child Further information is available from the [NSPCC and UKCIS Sharing nudes and semi-nudes: advice for education settings, working with children and young people](#).

APPENDIX 6B – ACTION TO TAKE IN THE CASE OF AN INCIDENT

STEP 1 – DISCLOSURE BY A STUDENT

Disclosures should follow the normal safeguarding practices and protocols. A student is likely to be very distressed especially if the image has been circulated widely and if they don't know who has shared it, seen it or where it has ended up. They will need pastoral support during the disclosure and after the event. They may even need immediate protection or a referral to Social Care.

The following questions will help decide upon the best course of action:

- Is the student disclosing about themselves receiving an image, sending an image or sharing an image?
- What sort of image is it? Is it potentially illegal or is it inappropriate?
- Are the School Child Protection and Safeguarding Policies and Practices being followed? For example, has the DSL been consulted and is their advice and support available?
- How widely has the image been shared and is the device in their possession?
- Is it a school device or a personal device?
- Does the student need immediate support and or protection?
- Are there other students and or young people involved?
- Do they know where the image has ended up? (This situation will need to be handled very sensitively. Whatever the nature of the incident, ensure school safeguarding and child protection policies and practices are adhered to).

STEP 2 – SEARCHING A DEVICE

It is highly likely that the image will have been created and potentially shared through mobile devices. The image may not be on one single device but may be on a website or on a multitude of devices; it may be on either a school-owned or personal device. It is important to establish the location of the image but be aware that this may be distressing for the young person involved, so be conscious of the support they may need.

When searching a mobile device, the following conditions should apply:

- The action is in accordance with the school's child protection and safeguarding policies.
- The search is conducted by the head teacher, or a person authorised by them.
- A member of the safeguarding team is present.
- The search is conducted by a member of the same sex.

If any illegal images of a child are found, you should consider whether to inform the police. As a general rule, it will almost always be proportionate to refer any incident involving "aggravated" sharing of images to the police, whereas purely "experimental" conduct may proportionately be dealt with without such referral, most particularly if it involves the child sharing images of themselves.

Any conduct involving, or possibly involving, the knowledge or participation of adults should always be referred to the police.

If an "experimental" incident is not referred to the police, the reasons for this should be recorded in writing. Always put the child first. Do not search the device if this will cause additional stress to the student/person whose image has been distributed.

If there is an indecent image of a child on a website or a social networking site, then you should report the image to the site hosting it. In the case of a sexting incident involving a child or young person where you feel that they may be at risk of abuse then you should report the incident directly to CEOP www.ceop.police.uk/ceop-report, so that law enforcement can make an assessment, expedite the case with the relevant provider and ensure that appropriate action is taken to safeguard the child.

STEP 3 – WHAT TO DO AND NOT DO WITH THE IMAGE

If the image has been shared across a personal mobile device:

- Confiscate and secure the device.
- Don't view the image unless there is a clear reason to do so.
- Don't send, share or save the image anywhere.
- Don't allow students to view images or send, share or save them anywhere.
-

If the image has been shared across a school network, a website or social network:

- Block the network to all users and isolate the image.
- Don't send or print the image.
- Don't move the material from one place to another.
- Don't view the image outside of the protocols of your safeguarding policies and procedures.
-

STEP 4 – WHO SHOULD DEAL WITH THE INCIDENT?

Whoever the initial disclosure is made to must act in accordance with the school safeguarding policy, ensuring that the DSL or a senior member of staff is involved in dealing with the incident.

The DSL should always record the incident. Senior Management should also always be informed. There may be instances where the image needs to be viewed, and this should be done in accordance with protocols. The best interests of the child should always come first. If viewing the image is likely to cause additional stress, staff should make a judgement about whether or not it is appropriate to do so.

STEP 5 – DECIDING ON A RESPONSE

There may be a multitude of reasons why a student has engaged in sharing nudes and semi-nudes. It may be a romantic/sexual exploration scenario, or it may be due to coercion.

It is important to remember that it won't always be appropriate to inform the police, this will depend on the nature of the incident. However, as a school it is important that incidents are consistently recorded. It may also be necessary to assist the young person in removing the image from a website or elsewhere.

If indecent images of a child are found:

- Act in accordance with your child protection and safeguarding policy, e.g. notify DSL.
- Store the device securely.
- Carry out a risk assessment in relation to the young person (see Appendix B of the Safeguarding Children in Education Guidance for a Sexting Risk Assessment pro-forma and flow chart).
- Make a referral if needed.
- Contact the police (if appropriate).
- Put the necessary safeguards in place for the student, e.g. they may need counselling support, immediate protection and parents must also be informed.
- Inform parents and/or carers about the incident and how it is being managed.

STEP 6 – CONTACTING OTHER AGENCIES – MAKING A REFERRAL

If the nature of the incident is high-risk, consider contacting Children's Social Care. Depending on the nature of the incident and the response, you may also consider contacting Local Police or referring the incident to CEOP.

Understanding the nature of the incident, whether experimental or aggravated, will help to determine the appropriate course of action.

STEP 7 – CONTAINING THE INCIDENT AND MANAGING PUPIL REACTION

Sadly, there are cases in which victims have had to leave or change schools because of the impact the incident has had on them. The student will be anxious about who has seen the image and where it has ended up. They will seek reassurance regarding its removal from the platform on which it was shared. They are likely to need support from the school, their parents and their friends. Education programmes can reinforce to all students the impact and severe consequences that this behaviour can have. Consider engaging with your Local Police and asking them to talk to the students.

Other staff may need to be informed of incidents and should be prepared to act if the issue is continued or referred to by other students. The school, its students and parents should be on high alert, challenging behaviour and ensuring that the victim is well cared for and protected. The students' parents should usually be told what has happened so that they can keep a watchful eye over their child, especially when they are online at home.

Creating a supportive environment for students in relation to the incident is very important.

STEP 8 – REVIEWING OUTCOMES AND PROCEDURES TO PREVENT FURTHER INCIDENTS

As with all incidents, a review process ensures that the matter has been managed effectively and that the school has the capacity to learn and improve its handling procedures. Incidents of sexting can be daunting for a school to manage, especially if the image has been widely shared between pupils in school.

Further information is available from the NSPCC.

APPENDIX 7

APPENDIX 7A – RADICALISATION AND EXTREMISM & PREVENTING RADICALISATION

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' safeguarding approach.

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

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

APPENDIX 7B – WHAT IS PREVENT?

Prevent is the Government's strategy to stop people becoming terrorists or **supporting terrorism in all its forms**. Prevent works at the pre-criminal stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour.

The Counterterrorism and Security Act (2015), places a duty on specified authorities, including schools and colleges, to have due regard to the need to prevent people from being drawn into terrorism ("The Prevent duty"). The Prevent duty reinforces existing duties placed upon educational establishments for keeping children safe by:

- Ensuring a broad and balanced curriculum is in place in schools to promote the spiritual, moral, social and cultural development of pupils.
- Assessing the risk of pupils being drawn into extremist views.
- Ensuring safeguarding arrangements by working in partnership with local authorities, police and communities.
- Training staff to provide them with the knowledge and ability to identify pupils at risk.
- Keeping pupils safe online, using effective filtering and usage policies.

APPENDIX 7C – WARNING SIGNS / INDICATORS OF CONCERN

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

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors. It is vital that school staff are able to recognise those vulnerabilities. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

Factors which may make pupils more vulnerable may include:

- **Identity Crisis:** The pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- **Personal Crisis:** The pupil may be experiencing family tensions, a sense of isolation, low self-esteem, they may have dissociated from their existing friendship group and become involved with a new and different group of friends, they may be searching for answers to questions about identity, faith and belonging.
- **Personal Circumstances:** Migration, local community tensions and events affecting the pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government Policy.
- **Unmet Aspirations:** The pupil may have perceptions of injustice, a feeling of failure and/or a rejection of civic life.

- **Experiences of Criminality:** Involvement with criminal groups, imprisonment, poor resettlement or reintegration.
- **Special Educational Need:** Pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

Pupils who are vulnerable to radicalisation may also be experiencing:

- Substance and alcohol misuse.
- Pressure.
- Influence from older people or via the Internet.
- Bullying.
- Domestic violence.
- Race/hate crime.

Behaviours which may indicate a child is at risk of being radicalised or exposed to extremist views could include:

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists.
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- Pupils accessing extremist material online, including through social networking sites.
- Possessing or accessing materials or symbols associated with an extremist cause.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Pupils voicing opinions drawn from extremist ideologies and narratives, which may include justifying the use of violence to solve societal issues.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group or cause.
- Changing their style of dress or personal appearance to accord with the group.
- Attempts to recruit others to the group/cause.
- Using insulting to derogatory names for another group.
- Increase in prejudice-related incidents committed by that person. These may include:
 - Physical or verbal assault
 - Provocative behaviour
 - Damage to property
 - Derogatory name calling
 - Possession of prejudice-related materials
 - Prejudice related ridicule or name calling
 - Inappropriate forms of address
 - Refusal to cooperate
 - Attempts to recruit to prejudice-related organisations
 - Condoning or supporting violence towards others
 - Parental reports of changes in behaviour, friendship or actions and requests for assistance.
 - Partner schools, local authority services, and police reports of issues affecting pupils in other schools.

APPENDIX 7D – REFERRAL PROCESS

All concerns about young people vulnerable to radicalisation should be referred to the DSL in the first instance. The DSL will follow safeguarding procedures managing/assessing the risk behaviours above including:

- Talking to the young person about their behaviour/views/on-line activity/friends etc.
- Discussion with parents/carers about the concerns.
- Checking out on-line activity, including social media if possible.
- Providing in-house support, if available.
- Providing Early Help targeted support if necessary.

Contacting Social Care and/or referring to the Channel Panel team

If concerns persist, then the DSL should make a referral to the social services, usually with the knowledge and

consent of the young person/family, though this is not always possible if the risk or threat may harm the young person/family/others.

The referral will then be subject to a triage process to decide whether or not it meets the threshold for a referral to Channel. If it does, the DSL should be prepared to attend the Channel Panel Meeting to share the concerns and help identify any intervention required. Further feedback to the Channel Panel will be expected following intervention to decide whether there are still concerns. Further information can be found in the BSCB.

APPENDIX 8

APPENDIX 8A – CRIMINAL EXPLOITATION – COUNTY LINES – WHAT IS COUNTY LINES?

County Lines is a very serious issue where criminal gangs set up a drug dealing operation in a place outside their usual operating area. Gangs will move their drug dealing from big cities (e.g. London, Manchester, Liverpool etc.) to smaller towns and rural areas in order to make more money. This can have a really big effect on the community who live there and bring with it serious criminal behaviour.

The UK Government defines county lines as:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Child Criminal Exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

Child Criminal Exploitation is common in county lines and 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.

Criminal exploitation of children is broader than just county lines and includes, for instance, children forced to work on cannabis farms or to commit theft.

APPENDIX 8B – CRIMES ASSOCIATED WITH COUNTY LINES

Drugs

County lines commonly involve the illegal distribution and dealing of seriously dangerous drugs from one city/town to another. The most common drugs involved are heroin and cocaine (crack and powder), but also MDMA, cannabis, amphetamines and spice.

Violence

Gangs sometimes use violence to threaten children and young people when recruiting them. Gangs also violently assault children and young people working for them if they find their drugs or money to be missing.

Weapons such as firearms, knives, bats, acid are sometimes used to make violent threats.

Exploitation

Gangs recruit and use children and young people to move drugs and money for them. Children as young as 11 years old are recruited, often using social media. They are exploited and forced to carry drugs between locations, usually on trains or coaches. They are also forced to sell drugs to local users.

Sexual Exploitation

Young girls are often groomed and forced into relationships with gang members and are made to perform sexual acts.

Signs to look out for

A young person’s involvement in county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs.

- Are they always going missing from school or their home?

- Are they travelling alone to places far away from home?
- Do they suddenly have lots of money/lots of new clothes/new mobile phones?
- Are they receiving much more calls or texts than usual?
- Are they carrying or selling drugs?
- Are they carrying weapons or know people that have access to weapons?
- Are they in a relationship with or hanging out with someone/people that are older and controlling?
- Do they have unexplained injuries?
- Do they seem very reserved or seem like they have something to hide?
- Do they seem scared?
- Are they self-harming?
-

APPENDIX 8C – TERMS ASSOCIATED WITH COUNTY LINES

Here are some words/terms that are commonly used when describing county lines activity. Someone using these words might be involved in or might know of County Lines activity.

Cuckooing

Cuckooing is when drug gangs take over the home of a vulnerable person through violence and intimidation, using it as their base for selling/manufacturing drugs.

Signs of cuckooing:

- An increase in people coming and going.
- An increase in cars or bikes outside.
- Litter outside.
- Signs of drug use.
- You haven't seen the person who lives there recently or when you have, they have been anxious or distracted.

Going Country

This is the most popular term that describes County Lines activity. It can also mean the act of travelling to another city/town to deliver drugs or money.

Trapping

The act of selling drugs. Trapping can refer to the act of moving drugs from one town to another or the act of selling drugs in one.

Trap House

A building used as a base from where drugs are sold (or sometimes manufactured). These houses usually are occupied by someone (usually adult drug users) but sometimes young people are forced to stay in trap houses.

Trap line

This refers to when someone owns a mobile phone specifically for the purpose of running and selling drugs.

APPENDIX 8D – WHAT TO DO IF YOU HAVE CONCERNS THAT A YOUNG PERSON IS INVOLVED IN COUNTY LINES

Follow your normal safeguarding procedures and refer to your school's DSL. The DSL will refer on to Children's Social Care and/or the Police, if the young person is at immediate risk of harm.

Further information is available in the regional guidance of the BSCB.

Further guidance is available in the Home Office's publication 'County Lines: criminal exploitation of children and vulnerable adults.'

APPENDIX 9

FORM 1: LOGGING A CONCERN ABOUT A CHILD'S SAFETY AND WELFARE – ALL STAFF AND VISITORS

Pupil's Name		Date of birth		Year Group	
Date		Time			
Name (Print)			Signature		
Position					
Note the reason(s) for recording the Incident					
Details of concern/incident – Record the who/what/where/when factually (continue on reverse of sheet if necessary):					
Any other relevant information (witnesses, immediate action taken etc.)					
Action Taken					

Reporting Staff Signature		Date	
DSL Response / Outcome			
DSL Signature		Date	

Check to make sure your report is clear now and will also be clear to a stranger reading it next year.

PLEASE PASS THIS FORM TO YOUR DESIGNATED SAFEGUARDING LEAD

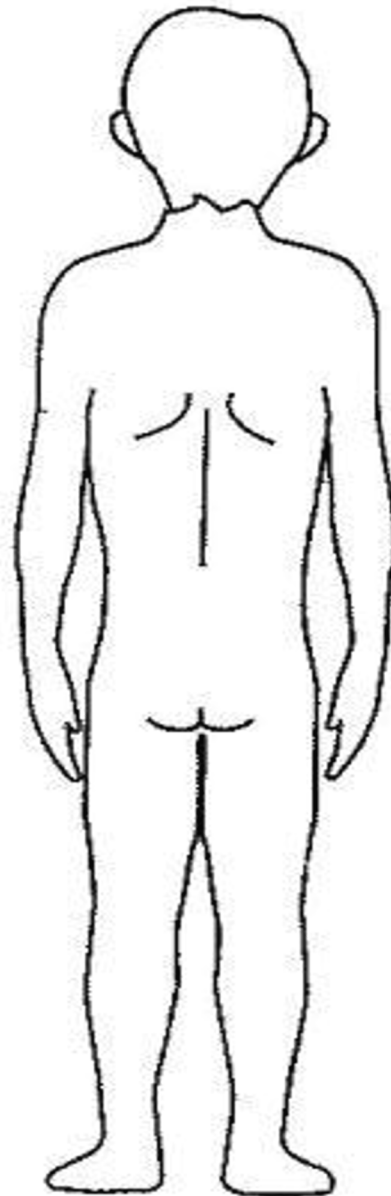
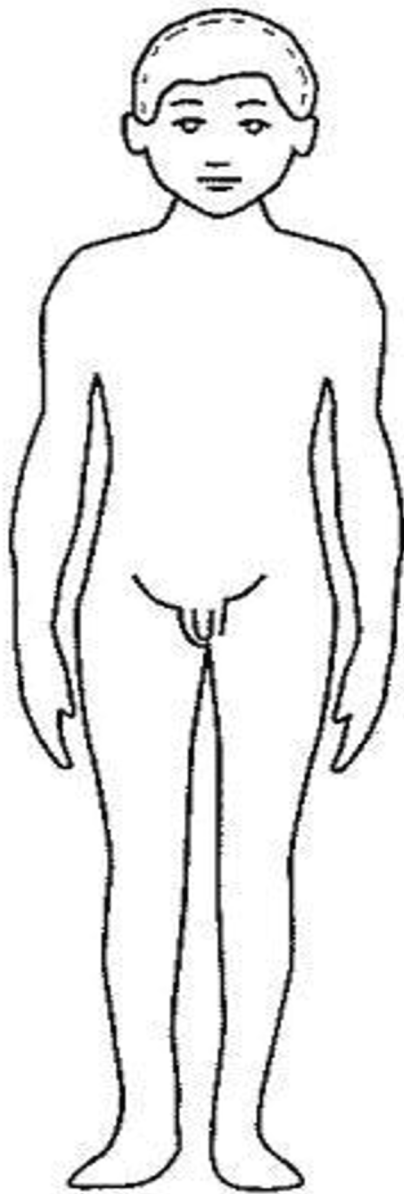
Continuation Sheet

Continuation Sheet	
Incident /Concern; other relevant information; Action Taken; Outcome	
Pupils Name	
Date	Details

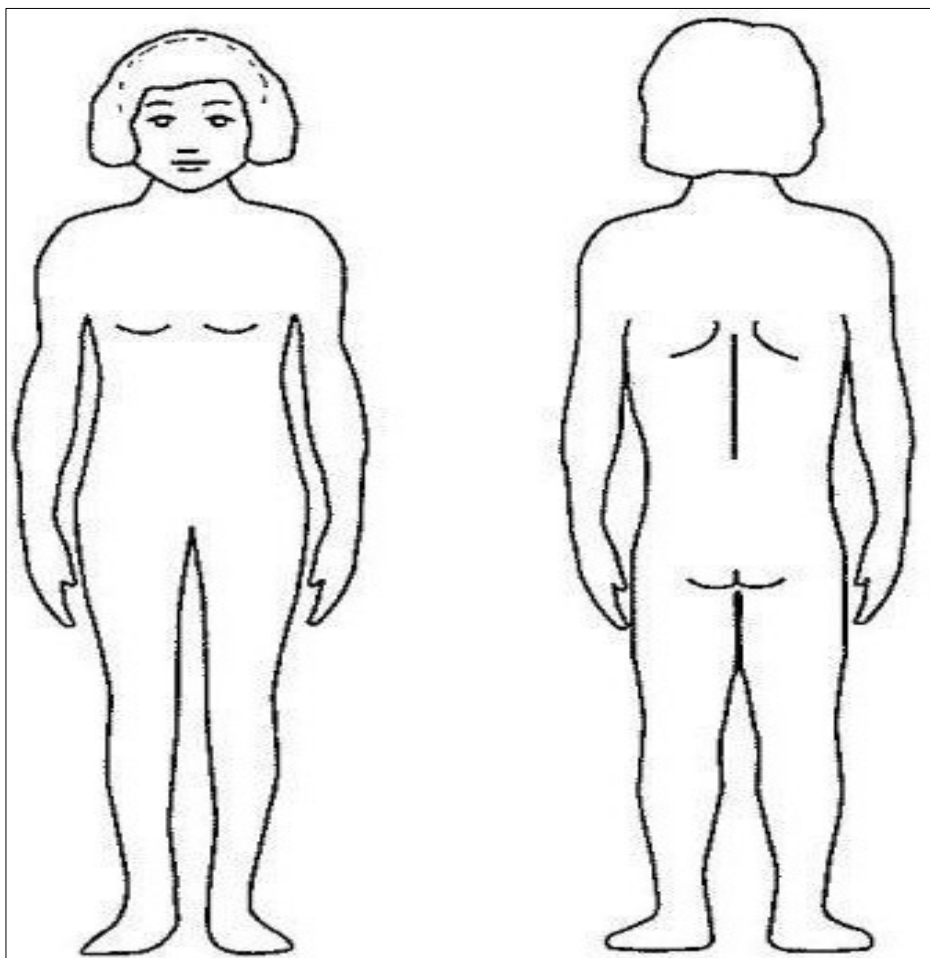
Signature	

APPENDIX 10

APPENDIX 10A – MALE BODY MAP



APPENDIX 10B – FEMALE BODY MAP



APPENDIX 11

FORM 2: FRONT SHEET: CHILD PROTECTION / WELFARE CONCERNS RECORD

Date File Started	
Name of child	
Any Other Names by which child is known, if Relevant	
Date of Birth	
Address	
Post code	

Family Members i.e. Parents, Carers, Siblings			
Name	Relationship	Address	School Details

Contact Details of other Professionals		
Name	Agency	Address

--	--	--

Are any other Child Protection Files held in School relating to this Child or another Child closely connected to him / her? YES / NO

APPENDIX 12

FORM 3: CHECKLIST FOR HANDLING AND RECORDING ALLEGATIONS OR COMPLAINTS MADE AGAINST A MEMBER OF STAFF OR VOLUNTEER

Name of Member of Staff who is subject of Allegation / Complaint	
Position of Member of Staff who is subject of Allegation / Complaint	
Is the Complaint Written or Verbal?	
Complaint made by	
Relationship to Child	
Name of Child	
Age of Child	
Date of Birth	
Parents / Carers Name and Address	
Date of Alleged Incident/s	
Did the Child attend on these Date/s?	
Nature of the Complaint. Continue on a separate sheet if necessary	

Other Relevant Information			
Senior LADO Advisor Contacted?	YES	NO	
If no, why not?			
Date Senior LADO Advisor Contacted			
Further Actions advised by Senior Advisor (LADO)			

Checklist

CHECKLIST	YES / NO	
Do you have details (either a written account or notes from a verbal account) of the alleged incident, signed and dated?	YES	NO
Have you checked if the incident could actually have taken place (i.e. was the child in the lesson; was the member of staff teaching the lesson that day)?	YES	NO
Is there evidence of significant harm – e.g. a visible injury?	YES	NO

Has a criminal offence taken place – e.g. has excessive force been used, that could be classed as an assault?	YES	NO
Has the incident been reported to anyone else – e.g. the Police?	YES	NO
Were there any witnesses to the incident – if so, have you made a note of names?	YES	NO
Are parents aware of the allegation?	YES	NO
Is the member of staff aware of the allegation?	YES	NO
Have you reported the allegation to the Senior Adviser for Safeguarding Children in Education or LADO?	YES	NO

REMEMBER! Do not attempt to Investigate the Allegation yourself

Your Name	
Your Position	
Signature	
Date	

APPENDIX 13

FORM 4: CHRONOLOGY – LOG OF INCIDENTS

Name of Pupil	
---------------	--

Date of Birth	
---------------	--

DATE	TIME	EVENT – DISCLOSURE / OBSERVATION / MEETING ETC	SUPPORTING DOCUMENTATION	STAFF INITIALS

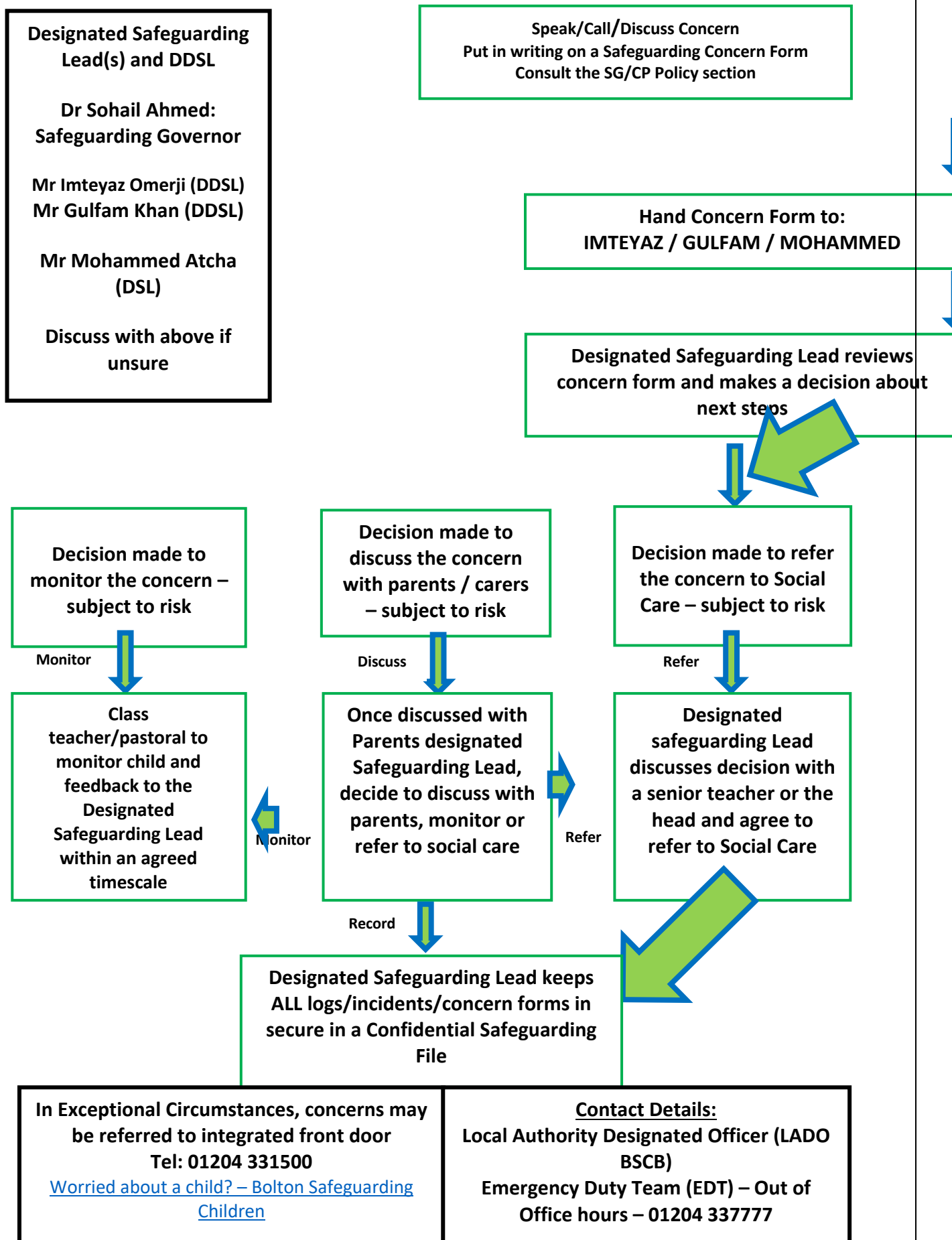
APPENDIX 14

Form 5: Log of Concerns Reported to the Designated Safeguarding Lead

DATE CONCERN RAISED	NAME AND ROLE OF PERSON RAISING THE CONCERN	NAME AND DATE OF BIRTH OF CHILD	ACTION (e.g. discussed with Parents, Monitor, referred to Social Care)	OUTCOMES (e.g. no further concerns, parents agreed to address, referred to early help, SC opened for assessment)

APPENDIX 15

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



AP

BROOKS SEXUAL BEHAVIOURS TRAFFIC LIGHT TOOL

<https://www.brook.org.uk/our-work/category/sexual-behaviours-traffic-light-tool>



SEXUAL BEHAVIOURS TRAFFIC LIGHT TOOL

Behaviours: age 0 to 5 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.



Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls



Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online



Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour.

They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains. Brook Sexual Behaviours Traffic Light Tool developed with permission from True Relationships & Reproductive Health, [2012]. Traffic Light guide to sexual behaviours in children and young people: identify, understand and respond. Brisbane: True Relationships & Reproductive Health, Australia. Limited Company registered in England and Wales, number 2466940. Registered Charity in England and Wales, number 708015. Registered Charity in Scotland, number SC043782.

Behaviours: age 5 to 9 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.



Green behaviours

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body



Amber behaviours

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex



Red behaviours

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations from this. Brook Sexual Behaviours Traffic Light Tool adapted with permission from True Relationships & Reproductive Health, [2012]. Traffic Lights guide to sexual behaviours in children and young people: identify, understand and respond. Brisbane: True Relationships & Reproductive Health Australia, Limited Company registered in England and Wales, number 2466940. Registered Charity in England and Wales, number 705013. Registered Charity in Scotland, number SC043722.



Behaviours: age 9 to 13 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.



Green behaviours

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peer



Amber behaviours

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs



Red behaviours

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains. Brook Sex and Relationship Traffic Light Tool adapted with permission from True Relationships & Reproductive Health, [2012]. Traffic Lights guide to sexual behaviours in children and young people: Be ready, understand and respond. Brisbane: True Relationships & Reproductive Health, Australia. Limited Company registered in England and Wales, number 2466940. Registered Charity in England and Wales, number 7090413. Registered Charity in Scotland, number SC045788.



Behaviours: age 13 to 17 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.



Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscurities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active



Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- asking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult-only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone



Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains. Brook Sexual Behaviours Traffic Light Tool adapted with permission from True Relationships & Reproductive Health. (2012). Traffic Lights guide to sexual behaviours in children and young people: identify, understand and respond. Brisbane: True Relationships & Reproductive Health, Australia. Limited Company registered in England and Wales, number 2466940. Registered Charity in England and Wales, number 703015. Registered Charity in Scotland, number SC045788.

SECTION 32 - COVID-19 ADDENDUM

The DfE has published updated guidance on the full return to schools from September 2020 and can be accessed at:

<https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirusoutbreak/guidance-for-full-opening-schools#contents>

This guidance outlines that as schools return to full operation, the following needs to be considered in relation to the safeguarding of pupils:

- School leaders should provide more time to safeguarding leads and deputies to help support staff and pupils.
- It is anticipated that during lockdown there may have been unseen and unknown safeguarding issues, and resources may be required to meet any additional demand.
- Communication with school nurses and public health officials should be robust to allow rapid and effective information sharing, response and support.

Please see COVID-19 Addendum to Safeguarding Policy for Further Details

APPENDIX 17

SCHEDULE OF CHANGES – SEPTEMBER 2026 UPDATE (V1 TO V2.0)

This schedule records the substantive changes made when the policy was updated from V1, which was written against Keeping Children Safe in Education 2025, to V2.0, which is written against Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026, the National Minimum Standards for Boarding Schools (May 2026), the Children’s Wellbeing and Schools Act 2026 and the Crime and Policing Act 2026. It is retained so that the governing body, the local authority and inspectors can see what changed, when and why.

Where	What has changed
Cover page	Version raised to V2.0. Statutory framework, supersedes and scope rows added so the governing body and inspectors can see at a glance which guidance the policy is written against.
Section 1 – Introduction	Citation updated from Working Together 2018 and KCSIE 2025 to Working Together 2026 and KCSIE 2026. New paragraphs 1.6 to 1.10 setting out the full legislative and regulatory framework, the persons and settings to which the policy applies, the position of students aged 16 and over, the withdrawal of KCSIE Annex A, and the publication and review requirements.
Section 2 – Procedures	Low-level concerns wording updated to KCSIE 2026. Nine new commitments added covering the mandatory reporting duty, the offence of preventing a report, the school’s status as a relevant partner under the Children’s Wellbeing and Schools Act 2026, the Family Help model, the annual filtering and monitoring review, the mobile phone policy, weapons concerns, safeguarding for premises hirers, and evidencing safeguarding culture.
Section 3 – Training	All staff, including those who do not work directly with children, must now read Part One of KCSIE 2026 in full following the withdrawal of Annex A. New paragraphs 3.8 to 3.12 covering the expanded training syllabus, boarding-specific staff training, governor and trustee training, the central training record, and the briefing of hirers, visiting scholars and contractors.
Section 4 – Responsibilities	Governing body responsibilities extended to Part One assurance, the named senior leader for filtering and monitoring, the mobile phone policy, DSL capacity, co-operation with safeguarding partners and the annual safeguarding audit. DSL responsibilities extended to the mandatory reporting duty, filtering and monitoring, harm-location analysis, boarding oversight, Prevent and the Annex B role description.
Section 5 – Managing concerns	New paragraphs 5.12 to 5.16 setting out the statutory duty to report child sexual abuse under the Crime and Policing Act 2026, when the duty is triggered, how it is discharged at AJI, the consequences of failure to report, and the relationship between the statutory duty and the wider duty to refer all concerns.
Section 6.1 – Children absent from education	Reflects the KCSIE 2026 clarification that absence, as well as being missing, can indicate a safeguarding concern. Adds fortnightly review of absence data against safeguarding records, off-roll and onward destination checks, the children not in school registers, and the position where a boarder fails to return from a holiday or exeat.
Section 6.3 – Serious violence	Substantially expanded in line with KCSIE 2026. Adds the indicators of serious violence, the requirement to report any concern about a weapon to the DSL immediately, and the link to searching, screening and confiscation powers and

	the Serious Violence Duty.
Section 6.5 – Extremism and radicalisation	Updated to the current Prevent Duty Guidance and Channel Duty Guidance. Adds the written Prevent risk assessment, external speaker and visiting scholar approval process, due diligence on teaching materials, the referral pathway, and the recognition that Prevent applies to all ideologies and that vulnerability commonly coexists with other safeguarding concerns.
Section 6.8 – Child on child abuse	Retitled to “child on child abuse (including harassment and violence)” per KCSIE 2026. Rewritten to reflect the Part Five continuum from harmful sexual behaviour to sexual violence, the safeguarding response owed to the alleged perpetrator as well as the victim, misogyny and misandry, AI-generated and deepfake imagery, the handling of concerns raised by children and parents, the prohibition on non-disclosure agreements, and risk assessment where victim and alleged perpetrator share boarding accommodation.
Section 6.9 – Upskirting	Adds the cyberflashing offence and the intimate image offences created by the Online Safety Act 2023, including digitally altered and artificially generated images.
Sections 6.13 to 6.19 – New	Seven new subsections reflecting content newly added or expanded in KCSIE 2026: violence against women and girls and misogyny; mental health as a safeguarding issue; young carers; safeguarding children with medical conditions; sport, physical activity and one-to-one instruction; artificial intelligence, deepfakes and nudification tools; and mobile phones and personal devices.
Section 9 – Online safety	Retitled to include filtering and monitoring. New paragraphs 9.10 to 9.14 covering the mandatory annual effectiveness review and its recording, the balance between monitoring and boarders’ privacy, biometrics and CCTV, the safeguarding response required for all indecent image incidents however generated, the online safety curriculum, and communication with parents.
Section 10.4 – Alternative provision	Adds the KCSIE 2026 confirmation that the school remains responsible for the safeguarding of any pupil it places with an alternative provision provider.
Section 11 – Reasonable force	New paragraphs 11.8 to 11.11 recording the statutory prohibition of corporal punishment under section 548 of the Education Act 1996 and its application to boarding staff, visiting scholars, volunteers and prefects; the absence of any authority for prefects to use physical intervention or to search; alignment with current restrictive intervention guidance and NMS 15.3 monitoring; and the prohibition of seclusion.
Sections 12 and 13 – Records and information sharing	Adds the DfE data protection guidance for schools, the Data (Use and Access) Act 2025, the Single Unique Identifier, record quality standards, the Working Together 2026 expectation of proactive information sharing, the school’s status as a relevant partner, and the position on consent.
Section 16 – Safer recruitment	New paragraphs 16.12 to 16.19. Records the removal of the supervision exemption from regulated activity by the Crime and Policing Act 2026 with effect from 1 September 2026 and the resulting re-audit of every role and of the single central record; pre-appointment supervision arrangements; online searches; DBS checks and written agreements for staff households and others living on the premises under NMS 19.2 and 19.3; educational guardians; overseas checks; and DBS and TRA referral duties.
Section 17 – Allegations	New paragraphs 17.6 to 17.9 covering the distinction between allegations meeting the harm threshold and low-level concerns and the central record of the latter; the KCSIE 2026 content on allegations relating to organisations or individuals using school premises; transferable risk; and allegations concerning staff household members, guardians, host families, prefects and students aged 18 or over.

Section 18 – Position of trust	New paragraphs 18.4 to 18.6 recording that the Police, Crime, Sentencing and Courts Act 2022 extended the abuse of position of trust offences to those who teach, train, supervise or instruct a child in a religion, and setting out the school's conduct expectations, which go beyond the criminal threshold.
Section 20 – Whistleblowing	New paragraphs 20.6 to 20.8 recording the offence of conduct intended to prevent a report, protection under the Public Interest Disclosure Act 1998, the prohibition on non-disclosure agreements that would suppress a safeguarding disclosure, and the external routes available to staff, parents and students.
Section 24 – Safe environment	New paragraphs 24.4 to 24.6 covering the Terrorism (Protection of Premises) Act 2025, under which the school is a standard tier premises with an expected compliance deadline of spring 2027, the documented evacuation, invacuation, lockdown and communication procedures, the site security risk assessment including overnight security, and visitor and contractor controls.
Sections 29 and 30 – Related policies and contacts	Seventeen further policies and boarding records added to the list of related documents. National helpline contacts added, with a requirement that local contact details are verified at each annual review and displayed in every boarding house.
Section 31 – Hire of premises	Expanded per KCSIE 2026 to require pre-hire safeguarding assurance, a written agreement, defined areas and times, exclusion from boarding accommodation, the school's own reporting duty where an allegation arises, and application of the out-of-school settings guidance to any supplementary or evening provision.
Section 33 – Boarding	Substantially expanded against the May 2026 National Minimum Standards and the new KCSIE 2026 boarding section. Now addresses all four matters NMS 8.4 requires a boarding child protection policy to cover, namely sexual relationships between children, child on child abuse in shared overnight accommodation, significant gender imbalance, and the management of boarders' devices including access over mobile data. Also adds boarding governance, night supervision, staff accommodation boundaries, boarders' voice, complaints and advocacy, contact with parents, health and privacy, fire and emergency arrangements, lodgings, host families and educational guardians, and the 295-day children's home registration threshold.
Section 34 – New	Students aged 16 and over and adult students. Confirms that 16 and 17 year olds are children in law, addresses their specific vulnerabilities, applies the National Minimum Standards position that students aged 18 and over who are not pupils are not accommodated with pupils under 18, governs supervisory roles held by adult students following the removal of the supervision exemption, and sets out the school's duties under section 42 of the Care Act 2014 towards adults at risk.
Section 35 – New	Safeguarding in religious instruction and the residential faith setting. Applies the position of trust offences to religious teaching, sets conditions for one-to-one instruction, records that corporal punishment admits no religious or cultural justification, prohibits the use of religious authority to secure silence, confirms that concerns are never resolved through internal or community mediation, addresses fundamental British values, and provides for students with limited English or limited experience of life in the UK.
Section 36 – New	Safeguarding culture, assurance and regulatory compliance. Covers the separate met or not met safeguarding judgement, compliance with Part 3 of the Independent School Standards and the National Minimum Standards, the annual safeguarding self-evaluation and audit, the governing body's monitoring dataset, and notification and follow-up obligations.
Appendix 1A	Definitions of abuse updated from Working Together 2018 to Working

	Together 2026.
Whole document	References to KCSIE 2025 updated to KCSIE 2026 throughout. Pending tracked changes from the previous review cycle accepted. Contents page must be refreshed in Word before publication.

Actions required before or immediately after publication

- Refresh the contents page in Word so that the new sections and appendix appear with correct page numbers. Place the cursor in the contents, press F9 and select “update entire table”.
- Re-audit every staff, volunteer, visiting scholar, prefect and adult student role against the revised definition of regulated activity, and update the single central record. This is the highest priority action arising from this update.
- Confirm and record that every member of staff, including those who do not work directly with children, has read Part One of KCSIE 2026 in full, following the withdrawal of Annex A.
- Carry out and record the first annual filtering and monitoring effectiveness review, covering boarding accommodation as well as teaching areas, and name the senior leader responsible.
- Brief all staff on the statutory duty to report child sexual abuse and on the offence of preventing a report, and record attendance.
- Brief trustees and governors on this update and minute the approval of V2.0.
- Review the Behaviour, Anti-Bullying, Mobile Phone, Online Safety, Safer Recruitment, Lettings and Boarding policies for consistency with this version.
- Confirm the school’s Martyn’s Law public protection procedures are documented and that all staff, including night staff, have been trained, ahead of the expected spring 2027 deadline.