Safeguarding Policy

Mary Elliot Academy

Last date ratified & signed by the Board of Trustees:	**November 2026**
To be reviewed annually:	**November 2027**

Contents

1. Introduction 3
2. Defining safeguarding 4
3. Key contacts 4
4. Roles and responsibilities 5
5. Reporting and responding to safeguarding concerns about pupils 9
6. Reporting concerns about adults or practice in school 10
7. Safeguarding pupils off site 10
8. Our local procedures 11
9. Records and information sharing 12
10. Site safety 13
11. Child-On-Child Abuse (COCA) 13
12. Pupils at greater risk of harm 15
13. Pupils who are questioning their gender 16
14. Annex A – Online Safety 18
15. Annex B – Specific safeguarding concerns in our school 20
16. Changes 29

1. Introduction

1.1. Mary Elliot Academy is a special provision for students aged 11-18 with severe and profound learning difficulties.

1.2. The academy is divided into four teaching pathways:
Severe Learning Difficulties (SLD) – Venture Pathway
Profound and Multiple Learning Difficulties (PMLD) – Aspire Pathway
Autistic Spectrum Conditions (ASC) – Endeavour Pathway
Post 16 – Consists of all three pathways

1.3. Mary Elliot Academy is committed to a strong culture of safeguarding, ensuring that all staff embrace the concept of "it could happen here" and recognise that safeguarding is everyone's responsibility. We ensure that pupils are respected, listened to, and supported when raising concerns. We remain child-centred and consider the child's voice, wishes, and lived experience in all safeguarding decisions. Safeguarding is embedded throughout school life, curriculum delivery, policies and decision-making.

1.4. We are committed to creating a culture of vigilance. We expect everyone who works in and visits our school to share this commitment. We encourage staff, pupils, and visitors to report anything that concerns them, and we will always act in the best interest of the child. Staff recognise that no single practitioner can have a full picture of a child's circumstances and therefore effective information sharing and multi-agency working are essential.

1.5. Our pupils have additional needs and often require support in highly individualised ways. This means that they are often more vulnerable than their peers. We are committed to educating them on how to stay safe, including when online, and to recognise when they may be at risk with these vulnerabilities in mind.

1.6. We ensure our pupils know how to get help when they need it. In line with the latest Working Together to Safeguard Children, we place importance on contextual safeguarding and consider risks in our local community when assessing the safety of our pupils.

1.7. The latest version of this policy is available on the school website and upon request. See our Trust Equality Information and Objectives (Public Sector Equality Duty) Policy for full information about how we meet these objectives.

2. Defining safeguarding

2.1. In line with Keeping Children Safe in Education 2026, we define safeguarding as:

2.1.1. Providing help and support to meet the needs of children as soon as problems emerge,

2.1.2. Protecting children from maltreatment, whether that is within or outside the home, including online,

2.1.3. Preventing the impairment of children's mental and physical health or development,

2.1.4. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care and

2.1.5. Taking action to enable all children to have the best outcomes.

2.2. Children includes everyone under the age of 18, though some of our learners in post-16 provision are aged 18 and over. We follow the same safeguarding principles for these pupils, though will refer to Adult Social Care for support when required.

3. Key contacts

Name	**Role**
Rachael Bowen	Designated Safeguarding Lead (DSL)
Jade Dowen	Family Liaison and Multi-Agency Coordinator
Katie Rogers Lara Latham Grace Murphy Rebecca Davies	Deputy DSL(s)
Lara Latham	Designated Teacher for Looked After Children
Simon Osborne	Safeguarding Governor
Abdullah Khalid	Chair of Governors
Weekdays 0300 555 2866 Evenings, weekends and bank holidays 0300 555 2922 or 0300 555 2836	Children's Social Care

0300 555 2922	Adult Social Care
01922 652322	LADO
01922 652 816	Virtual School
James Simoniti	Trust Safeguarding and Attendance Manager All external contact via enquiry@thrive.ac
Richard Chapman	Chief Executive Officer (CEO). All external contact via enquiry@thrive.ac

4. Roles and responsibilities

4.1. The DSL and Deputies will:

4.1.1. Take lead responsibility for safeguarding (DSL) with the support of the Deputy DSLs.

4.1.2. Be available during term time for staff to discuss any safeguarding concerns. Ensure robust cover arrangements are in place for periods when they are unavailable.

4.1.3. Lead on referrals to local authority children's social care; the Channel Programme where there is a radicalisation concern; the DBS where relevant, in relation to allegations of abuse made against staff; and where a crime has been committed, to the Police, where appropriate.

4.1.4. Ensure that the school fulfils its duty to safeguard pupils who are not on school site.

4.1.5. Act as a source of support, advice and expertise for all staff. Liaise with relevant staff in school, e.g., SENCO, Senior Mental Health Lead, attendance lead, online safety providers, etc.

4.1.6. Act as a point of contact with the safeguarding partners and share information with them as required.

4.1.7. Liaise with the Headteacher to keep them informed of issues, especially police investigations and ongoing enquiries under section 47 of the Children Act 1989.

4.1.8. Liaise with the case manager as required and the LADO for child protection concerns in cases which concern a staff member. Ultimately,

the Headteacher will oversee this, but the DSL is likely to play a key role in supporting.

4.1.9. Promote engagement with parents and/or carers in safeguarding and promoting the welfare of pupils.

4.1.10. Take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues of pupils and through identifying the impact these may have on attendance, engagement and achievement at school.

4.1.11. Work with the Designated Teacher to ensure that the school knows the cohort of children who have or have had a social worker, their academic progress and attainment, and maintain high aspirations for this cohort.

4.1.12. Ensure records are kept in line with good record-keeping practice as outlined in the latest Keeping Children Safe in Education.

4.1.13. Ensure safeguarding files are transferred to new schools within 5 days, ensuring safe transit and confirmation of receipt. Where the DSL has concerns about the risk posed by a child to themselves or others, they will arrange a meeting with the receiving DSL to discuss the child.

4.1.14. Ensure that this policy and safeguarding procedures are accessible to all new and existing staff, that this is reviewed at least annually and is available publicly.

4.1.15. Liaise with local safeguarding partners to ensure that staff are aware of any training opportunities and the latest local policies.

4.1.16. Update formal training every two years, covering the content outlined in KCSIE, and ensure any Deputy DSLs also renew this training. Update own knowledge and skills at least annually.

4.1.17. Work to understand the views of pupils and encourage a culture of listening to, and engaging with, pupils.

4.1.18. Work with key members of staff to ensure any Restrictive Physical Intervention is completed in line with guidance and reviewed. See the Trust Safe Touch Policy for further details.

4.1.19. Hold and share information in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and the guidance around information sharing in KCSIE.

4.1.20. Be open to challenge from other members of staff and recognise that this is important for effective safeguarding.

4.1.21. Liaise with the Trust Safeguarding and Attendance Manager where support is needed or a significant incident occurs.

4.2. **The Governing Body will:**

4.2.1. Review and approve this policy at each review and hold the Headteacher to account over its implementation.

4.2.2. Appoint a safeguarding governor to oversee safeguarding compliance and the effectiveness of this policy.

4.2.3. Review Keeping Children Safe in Education at least annually.

4.2.4. Engage with safeguarding training, including training at induction, that equips the governing body with the skills to provide strategic challenge in relation to safeguarding.

4.2.5. Be aware of the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), which place duties on organisations and individuals to process personal information fairly and lawfully and to keep information they hold safe and secure. In addition, adhere to the ICO guidance, which includes information on obligations and how to comply with them.

4.2.6. Review the filtering and monitoring system and processes to ensure compliance with Keeping Children Safe in Education.

4.3. **All staff will:**

4.3.1. Receive appropriate safeguarding and child protection training, including online safety, Prevent and emerging concerns, at least annually.

4.3.2. Understand local Family Help arrangements and the distinction between school-led support and support coordinated by the local authority and other safeguarding partners. They will contribute to these where relevant.

4.3.3. Understand the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (child protection) that may follow a referral, along with the role they might be expected to play in such assessments.

4.3.4. Know what to do if they suspect, or a child tells them they are, being abused, exploited, or neglected and maintain an appropriate level of confidentiality.

4.3.5. Know not to promise a child that they will not tell anyone about a report of any form of abuse.

4.3.6. Reassure pupils that they are being taken seriously and assure them that they are not causing a problem by reporting.

4.3.7. Be aware that children may not feel ready or be able to tell someone that they are being abused, exploited, or neglected, and/ or they may not recognise their experiences as harmful.

4.3.8. Know the indicators of abuse, neglect, exploitation and modern slavery, exercise professional curiosity and know that such issues are rarely standalone ones.

4.3.9. Be aware that technology is a significant component in many safeguarding and wellbeing issues and the risks young people face online.

4.3.10. Know how to report concerns about safeguarding practices within the school via whistleblowing procedures or other means.

4.3.11. Know how to report safeguarding concerns about another member of staff or adult in school.

4.3.12. Read and understand Part 1 and Annex A of Keeping Children Safe in Education.

4.3.13. Feel able to challenge and question safeguarding arrangements.

4.4. **The Trust Safeguarding and Attendance Manager will:**

4.4.1. Deliver, or arrange delivery of, a safeguarding audit at least annually that is shared with Senior Leaders, governors and Trustees.

4.4.2. Provide advice and support in managing safeguarding in the setting, where appropriate.

4.4.3. Offer Anchoring Sessions for the DSL at least termly.

4.4.4. Convene three DSL forums per academic year, to connect DSLs across the Trust and brief DSLs on emerging concerns.

4.4.5. Support with multi-agency working, particularly where escalation is required or where there are challenges in effective collaboration.

4.4.6. Support Attendance Teams to ensure that the link between attendance and safeguarding remains embedded.

5. Reporting and responding to safeguarding concerns about pupils

5.1. All safeguarding concerns must be reported, no matter how small they may seem.

5.2. Where staff or visitors have a safeguarding concern about a pupil, they should report this as soon as possible to the DSL or Deputies by recording on CPOMS.

5.2.1. Where the individual believes that the concern is urgent, they should speak with the DSL or Deputy DSL immediately, interrupting if necessary.

5.2.2. In the extreme situation that the individual is unable to contact the DSL or Deputies, they should contact another member of the Senior Leadership Team or the Trust Safeguarding and Attendance Manager. They may also contact children's social care themselves – see section 'Our Local Procedures' for information on how to do this.

5.3. All concerns must be recorded in writing on CPOMS, even if they are initially shared verbally. They should record:

5.3.1. A first-hand account,

5.3.2. Reference only facts, not opinions,

5.3.3. A clear and comprehensive summary of the concern.

5.4. The DSL or Deputy will then decide upon which action to take. This could include:

5.4.1. Providing pastoral support in school,

5.4.2. Making a referral for Early Help/Targeted Family Help or

5.4.3. Making a referral to children's social care.

5.4.4. See section 'Our local procedures' for further information.

5.5. In the vast majority of cases, the concern will be shared with parents or carers, and we will look to work collaboratively with families. However, where it is believed that sharing the concern will put the child at greater risk of harm, we may make a referral to children's social care without informing parents or carers.

5.6. The action taken should be recorded on CPOMS, including how the matter was resolved and the rationale for any action taken.

6. Reporting concerns about adults or practice in school

6.1. Where staff or visitors have a safeguarding concern about an adult in school, they should report this to the Headteacher via email, even if it is verbally reported first.

6.2. If their concern relates to the Headteacher, they should report this to the Chief Executive Officer via the email speakup@thrive.ac, marking the message as urgent. The Trust Safeguarding and Attendance Manager should also be contacted to support with this. They may also contact the Local Authority Designated Officer (LADO) themselves.

6.3. It is vital to report all concerns, even if they seem small. 'Low-level concerns' may form a wider picture of inappropriate behaviour and will support leaders to address emerging concerns early. Low-level concerns could include incidents such as:

6.3.1. Being over-friendly with pupils,

6.3.2. Appearing to have 'favourite' pupils or

6.3.3. Humiliating pupils.

6.4. When a matter is reported, the Headteacher/CEO will decide whether it meets the harm threshold and refer to the LADO if so. For further details on managing allegations against adults, including details on the LADO process, see the Trust Safeguarding Concerns and Allegations Made About Staff, Supply Staff, Contractors and Volunteers Policy.

6.5. Where there are concerns about general safeguarding practice in the school, these should be reported to the Headteacher. Trust-wide concerns should be reported to the CEO by emailing speakup@thrive.ac.

6.6. For further details on reporting concerns about practice, and whistleblowing more generally including external organisations to contact, see the Trust Whistleblowing Policy.

7. Safeguarding pupils off site

7.1. We have a responsibility to safeguard all pupils, including those who are off site. This includes:

7.1.1. **Absent pupils** – We proactively seek contact when we have not heard from parents/carers and conduct home visits when necessary. See our Attendance Policy for further information.

7.1.2. **Pupils attending Alternative Provision (AP)** – We conduct due diligence on all providers to ensure that we are satisfied that they provide a safe environment for our pupils, obtaining written confirmation of safeguarding checks on their staff. Once commissioned, we receive attendance notifications and conduct half-termly reviews to ensure it remains suitable.

7.1.3. **Pupils attending work experience** – We ensure that organisations have suitable procedures in place for protecting children from harm and ensure that an adult with an appropriate DBS certificate is supervising the pupils, which may include a member of school staff.

8. Our local procedures

8.1. Family Help, sometimes called Early Help or Targeted Family Help

8.1.1. Prior to receiving Family Help, children and families will be supported through universal and early support family services such as Family Hubs, schools and education providers, GPs and universal health services as well as the voluntary and community services.

8.1.2. For early support from specialist services such as housing, social care, police and wider services when we require additional support from our multi agency colleagues, we will request a Locality Conversation, accessed: https://www.walsallfamilyhubs.co.uk/family-hubs/walsall-family-hubs/families-first-children-partnership-page/our-family#main

8.1.3. The support provided must also empower families to become resilient over time and build connections to their local community. Our school has attended the Families First Training and follows the pathway as outlined. Families First for Children - Instruction Manual (Procedures and Processes) Final.pdf

8.1.4. If Family Help is appropriate our designated safeguarding lead/deputy will lead/contribute to the Family First Assessment, accessed: https://www.walsallfamilyhubs.co.uk/family-hubs/walsall-family-hubs/families-first-children-partnership-page/our-family#main liaising with external agencies and complete any required requests and/or assessments. Wider school staff may be required to support other agencies and professionals contribute to information gathering and take the role of Family Help Coordinator.

8.1.5. All children and families receiving additional support will be part of the ongoing review process with consideration given to any escalating needs/concerns which may require a referral to Children's Services for assessment for statutory services.

8.2. **Referrals to Children's Social Care**

8.2.1. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care and if appropriate the police is made immediately. Referrals should follow the local referral process, detailed here: https://go.walsall.gov.uk/children-and-young-people/family-help/request-help-and-support-or-report-safeguarding-concern-child

8.3. If, after a referral, the child's situation does not appear to be improving, our academy will consider following local escalation procedures to ensure our concerns have been addressed and, most importantly, that the child's situation improves.

9. Records and information sharing

9.1. We recognise the importance of information sharing between practitioners and local agencies. We are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging or when a child is already known to the local authority's children's social care.

9.2. The school is also part of Operation Encompass. This national initiative ensures the police share information with the DSL about any domestic abuse incidents to which a child has been present. This allows the DSL to provide timely support to the child as required by the start of the next school day.

9.3. We have due regard to the relevant data protection principles, understanding that The Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. At Mary Elliot Academy, we understand that the Data Protection Act 2018 and the GDPR do not prevent the sharing of information to keep children safe.

9.4. In line with our mandatory duty, we will notify our local authority if we become aware of any private fostering, to allow the local authority to check that the arrangement is suitable and safe for the child. Private fostering occurs when a child under the age of 16 (under 18 if disabled)

is provided with care and accommodation by a person who is not a parent, a person with parental responsibility for them, or a relative, in their own home.

10. Site safety

10.1. All staff members are responsible for ensuring the buildings and school site are secure and for reporting any concerns that arise.

10.2. The identities of all visitors and volunteers entering the school are checked. Visitors are expected to sign in and out at Reception, and to display a visitor's badge while on the school site. Any individual who is unknown or not identifiable will be challenged by our staff for clarification and reassurance.

10.3. The school will not accept the behaviour of any individual, parent, or anyone else who threatens the school's security or makes others feel unsafe. Such behaviour may result in a decision to refuse the person access to the school site. See our Trust Parent Communications and Code of Conduct Policy for further details.

11. Child-On-Child Abuse (COCA)

11.1. Our pupils have a right to learn in a safe environment, and we do not tolerate COCA – whether it is inside or outside of school, or online. We do not accept the attitudes of 'boys will be boys', or 'it's just part of growing up'.

11.2. We recognise that some of our pupils may display behaviour when dysregulated, arising from their needs. Such behaviour rarely has intent to harm – however, we understand that the 'victim' of such actions will still be harmed. We always ensure that support is offered to pupils affected by COCA, regardless of intent.

11.3. We recognise the following behaviours as COCA:

11.3.1. Bullying (including cyberbullying, prejudice-based and discriminatory bullying)

11.3.2. Abuse in intimate personal relationships between children (also known as teenage relationship abuse)

11.3.3. Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online

element which facilitates, threatens and/or encourages physical abuse)

11.3.4. Serious physical assault and harm, or the threat of harm with a weapon

11.3.5. Harmful sexual behaviour, including misogyny, sexual violence and sexual harassment.

11.3.6. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

11.3.7. Consensual and non-consensual sharing of self-generated intimate images and/or videos, including ai-generated images, manipulated images and deepfakes – these will all trigger a safeguarding response.

11.3.8. Upskirting, which is a criminal offence

11.3.9. Initiation/hazing-type violence and rituals

11.4. The school recognises that misogyny may contribute to harmful sexual behaviour, sexual harassment, sexual violence, online abuse and coercive behaviour. Staff will actively challenge misogynistic attitudes, language and behaviour and respond through safeguarding and behaviour procedures. The school educates pupils about respectful relationships, consent, equality and the impact of discriminatory and misogynistic behaviour.

11.5. We proactively work to reduce the risk of COCA through our curriculum. This is tailored to our pupils' needs and level of understanding and outlines that such actions are not acceptable. Staff also work to develop positive relationships between pupils and support them in their self-regulation.

11.6. Concerns around COCA should be reported on CPOMS using appropriate categories, where they will be reviewed by the Behaviour and Safeguarding Teams.

11.7. We are particularly mindful of the impact of sexual COCA. Any sexual violence will be accompanied by a risk assessment and we will consider reporting the matter to the police. Furthermore, support will be provided to both parties where appropriate, which may include a referral to Children's Social Care.

11.8. Technology is a key component in facilitating COCA. We therefore do not allow pupils' phones and smart technology, such as smart-watches, in school – they must be handed in on arrival and pupils are not allowed them until they leave.

11.9. Mary Elliot Academy recognises that some pupils may display behaviour when dysregulated as a result of their needs and that such behaviour may have little or no intent to harm. However, the pupil affected may still experience harm. Appropriate support will therefore be offered to pupils affected by child-on-child abuse regardless of intent.

12. Pupils at greater risk of harm

12.1. As Mary Elliot Academy is a special school, all pupils in our setting have an Education, Health and Care Plan (EHCP), meaning that they have a range of Special Educational Needs and Disabilities. They are therefore often far more vulnerable than their peers and we will always work collaboratively with other involved agencies to ensure that they are safeguarded effectively. However, we recognise that some pupils may be especially vulnerable, such as:

12.2. **Pupils who have a social worker**

12.2.1. We record where a pupil has a social worker and maintain contact to share information, when appropriate.

12.3. **Looked After Children (LAC) and Previously Looked After Children (PLAC)**

12.3.1. We record where a pupil is LAC or PLAC, and the appropriate contact arrangements for carers. Our Designated Teacher works with the Virtual School to promote the educational achievement of these pupils.

12.3.2. Where they have left local authority care, we will obtain the details of and work with their Personal Advisor.

12.4. **Pupils requiring mental health support**

12.4.1. Staff are aware that mental health problems may be an indicator of other safeguarding concerns, or concerns in themselves. They have four key roles:

12.4.2. Promoting good mental wellbeing and preventing the onset of mental illness,

12.4.3. Observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,

12.4.4. Ensuring early targeted support is provided, and liaison with/referral to specialist services where needed.

12.5. **Persistently or Severely Absent pupils**

12.5.1. We proactively offer support to such pupils and their families, recognising that high levels of absence can indicate serious safeguarding concerns, such as child exploitation, neglect and many others. Our routine monitoring of attendance patterns ensures that we spot these patterns early. See our Attendance Policy for further information about this.

12.5.2. Where we have concerns that a child is a Child Missing Education (CME), we contact the Local Authority's CME team. Details can be found here - https://go.walsall.gov.uk/practitioner-support/children-missing-education.

12.6. **Lesbian, Gay, Bisexual or Transgender/Gender Questioning pupils**

12.6.1. Such pupils may be targeted by their peers, regardless of whether they are 'out' or simply perceived to be 'different'. We do not tolerate bullying in our school and actively look out to ensure that these pupils are not being targeted.

12.6.2. We take a cautious approach that considers the individual needs of each child, working in partnership with parents/carers (other than in exceptionally rare circumstances where involving parents/carers would constitute a significant risk of harm to the child).

12.7. **Young carers**

12.7.1. We are mindful that, despite the challenges many of our children face, they may also have care responsibilities at home, for parents/carers or siblings.

12.7.2. To identify young carers, we develop strong working relationships with pupils, families and other services.

12.7.3. Where young carers are identified, we support them by discussing individualised support plans and consider referrals to other services. Local Authority advice may also be sought in relation to local support available. Further details can be found here - https://go.walsall.gov.uk/children-and-young-people/family-help/young-carers

13. Pupils who are questioning their gender

13.1. As noted above, we recognise these pupils as especially vulnerable and proactively work to minimise the risk of bullying.

13.2. We do not initiate action around social transition. Prior to any such arrangement being supported by the school, we await a request from the pupil or their parent/carer.

13.2.1. Where such a request is made by a pupil, we will discuss this with them and their parents/carers, unless there is a genuine belief that involving parents/carers would constitute a greater risk to the child than not involving them. Where these apply, the DSL will consider the appropriate course of action.

13.2.2. Where a pupil initiates a discussion where they question their gender with staff, but makes no request to socially transition, this will not be routinely shared with parents/carers if the pupil does not want this. However, if safeguarding risks become apparent, this may need to be shared on a case-by-case basis.

13.3. Where there is agreement from the child, their parents/carers and the school that it is in the best interests of the child, we will cautiously accommodate social transition within our setting.

13.4. A record of all conversations and decision making around the above processes will be recorded on CPOMS. Furthermore, if the circumstances of the case change, the situation may be reviewed.

13.5. Where social transition is accommodated in school, certain limitations will still apply. For example, their biological sex will still be recorded on school systems and their legal name will show on official documents.

13.5.1. They will also still be required to use toilets assigned to their biological sex and compete with peers of the same biological sex for safety reasons in Physical Education lessons.

13.5.2. Accommodations are in place within our school to accommodate this, including gender-neutral, lockable toilet rooms and mixed PE lessons.

13.6. Should a pupil wish to 'de-transition' following an accommodation of social transition, the same process would apply.

14. Annex A – Online Safety

14.1. Online safety is a crucial part of our safeguarding ethos. However, this landscape is continuously changing, particularly with the emergence of Artificial Intelligence (AI) in recent years. Our approach to online safety is based on addressing the following categories of risk:

14.1.1. **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, misinformation, disinformation (including fake news), conspiracy theories, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

14.1.2. **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit the user for sexual, criminal, financial or other purposes

14.1.3. **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

14.1.4. **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

14.2. Filtering, monitoring and acceptable use

14.2.1. To manage risk in school, we use robust filtering and monitoring systems – Smoothwall is our provider. Where these identify concerns, these are recorded on CPOMS and investigated by the DSL or a Deputy. Where concerns appear to be substantiated, concerns are dealt with in line with this policy. These systems are reviewed annually by the DSL and Trust Safeguarding and Attendance Manager. See our Trust Filtering and Monitoring Policy for further details.

14.2.2. These systems are not foolproof and staff must physically monitor pupils' device usage, and report any issues that they identify to the DSL.

14.2.3. IT users in school must follow our Trust Acceptable Use Policy.

14.3. Learning about online safety

14.3.1. Online safety is a key aspect within safeguarding updates shared with staff, Governors and Trustees annually. It is not treated as a standalone issue.

14.3.2. It is the responsibility of parents/carers to keep their children safe online when they are not in school. However, we recognise that this can be challenging and are committed to supporting parents/carers develop their knowledge about online safety. We do this through information in newsletters and contacting parents to provide advice where concerns are identified.

14.3.3. A key development in recent years is the emergence of AI. We recognise the life changing possibilities that AI creates for our pupils and see this as an opportunity. However, it also presents serious risks, particularly around deepfakes, 'neurotypical bias' and over-reliance on the technology. Where AI is used by a pupil to abuse or humiliate their peers, this will be treated as COCA. See our Trust AI Policy for further information.

14.3.4. Pupils in our school are also taught how to use the internet safely. We do this through our curriculum, which is tailored to the needs of each curriculum pathway.

15. Annex B – Specific safeguarding concerns in our school

15.1. KCSIE splits abuse into four main categories:

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

15.1.2. **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet another person's needs. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as 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 beyond a child's developmental capabilities, as well as overprotection, limiting exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), 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, although it may occur alone.

15.1.3. **Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming 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.

15.1.4. **Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy,

for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. It is important to note that for our pupils, withholding medication may be a serious form of neglect, particularly where this is essential for their health.

15.2. There are a number of other safeguarding concerns that ALL staff need to be aware of. These are detailed further in Annex A of KCSIE, which all staff should read. They are detailed below with emphasis on how they may manifest in our setting.

15.3. **Child Criminal Exploitation (CCE):** where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE can also occur through the use of technology. Our pupils are at particular risk of exploitation due to their vulnerability. Some of the following can be indicators of CCE:

15.3.1. Children who appear with unexplained gifts or new possessions

15.3.2. Children who associate with other young people involved in exploitation

15.3.3. Children who suffer from changes in emotional well-being

15.3.4. Children who misuse drugs and alcohol

15.3.5. Children who go missing for periods of time or regularly come home late

15.3.6. Regularly miss school or education, or do not take part in education

15.4. **County lines:** a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas, using dedicated mobile

phone lines or other forms of "deal line". Exploitation is an integral part of the county lines offending model, with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence towards victims (and their families) if they attempt to leave the county lines network.

15.5. **Serious violence**: where children are involved with serious violent crime, which may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Indicators may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. There is a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

15.5.1. Staff must immediately report concerns regarding a child carrying, possessing, displaying or expressing an intention to use a weapon to the DSL or Deputy DSL. The DSL will assess risk and determine appropriate safeguarding action, including partnership working with police and other agencies where required.

15.5.2. Where there are concerns around a risk of a pupil becoming involved in serious violence, the DSL will contact the Trust's "Risk of Vulnerability for Use of Violence (RVV) Panel" for advice - rvv-panel@thrive.ac .

15.6. **Child Sexual Exploitation (CSE):** can be a one-off occurrence or a series of incidents over time and ranges from opportunistic to complex organised abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. Indicators can be similar to the indicators of CCE, as well as:

15.6.1. Referring to older children or adults as 'boyfriends' or 'girlfriends'; and

15.6.2. Children who suffer from sexually transmitted infections or become pregnant.

15.7. **Modern Slavery and the National Referral Mechanism:** modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

15.7.1. The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting victims of exploitation and modern slavery. Whatever form it takes, exploitation and modern slavery are child abuse, and relevant child protection procedures must be followed if modern slavery or trafficking is suspected.

15.8. **Child abduction and community safety incidents**: child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances) and by strangers.

15.9. **Cybercrime**: criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber-dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

15.9.1. Unauthorised access to computers (illegal 'hacking'), for example, accessing a school's computer network to look for test paper answers or change grades awarded.

15.9.2. 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.

15.9.3. 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.

15.9.4. Where concerns around cybercrime are prevalent, we will consider engaging with the Cyber Choices programme from the National Crime Agency, to support the child to channel their skills safely and legally.

15.10. **Domestic abuse**: the Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

15.11. (a)physical or sexual abuse;

15.12. (b) violent or threatening behaviour;

15.13. (c) controlling or coercive behaviour;

15.14. (d) economic abuse (adverse effect on the victim to acquire, use or maintain money or other property; or obtain goods or services); and

15.15. (e) psychological, emotional or other abuse.

15.16. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Exposure to domestic abuse can have a serious, long-lasting emotional and psychological impact on children and therefore, children are now classified as victims and not merely witnesses where domestic abuse occurs. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

15.18. **Homelessness**: being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. 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. It should also be recognised that, in some cases, 16- and 17-year-olds may be living independently of their parents or guardians, for example, through their exclusion from the family home, and they will require a different level of intervention and support.

15.19. **Honour or faith-based abuse (including female genital mutilation and forced marriage):** encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

15.20. **Forced marriage:** forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Schools and colleges can play an important role in safeguarding children from forced marriage.

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

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

15.22. 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 to report to the police where they discover that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. If a victim discloses that FGM has been carried out on them, teachers must personally report to the police, alongside the DSL.

15.23. Potential risk factors may include when:

15.23.1. A female child is born to a woman who has undergone FGM

15.23.2. A female child has an older sibling or cousin who has undergone FGM

15.23.3. A woman/family believe FGM is integral to cultural or religious identity

15.23.4. A parent or family member expresses concern that FGM may be carried out on the girl

15.23.5. A girl talks about FGM in conversation, for example, a girl may tell other children about it

15.23.6. A child is taken on a long holiday to a country where FGM is prevalent

15.24. **Radicalisation**: We recognise that children may be susceptible to extremist ideology and radicalisation. As with other safeguarding risks, staff should be alert to changes in children's behaviour that could indicate they may need help or protection.

15.25. Our school adheres to the Prevent duty, and we have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". We build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues and promoting fundamental British values.

15.26. Staff should be alert to changes in children's behaviour that could indicate they may need help or protection. Staff should use their judgement in identifying children who might be susceptible to radicalisation and act proportionately, which may include the designated safeguarding lead (or deputy) making a Prevent referral.

15.27. Early indicators of radicalisation or extremism may include:

15.27.1. Showing sympathy for extremist causes

15.27.2. Glorifying or advocating violence, especially to other faiths or cultures

15.27.3. Intolerance of difference, including faith, culture, gender, race or sexuality

15.28. All our staff receive training on the Prevent duty annually.

15.29. If the school needs to make a Prevent referral, we follow the Local Authority process, outlined here: https://walsallsp.co.uk/children/professionals/professionals-working-with-children/prevent/

15.30. Training for key staff to complete Prevent referral is available here: https://www.gov.uk/guidance/prevent-duty-training

15.31. As part of managing the risk of radicalisation, we have clear protocols for ensuring that any visiting speakers, whether invited by staff or by children themselves, are suitable and appropriately supervised. In England, the Prevent duty complements schools' other responsibilities to ensure that speakers do not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Our protocols include using reputable companies and seeking references where appropriate.

15.32. We also maintain a Prevent Risk Assessment that outlines the steps that we take to manage the risk of radicalisation in our setting.

15.33. **Mental health**: all staff are aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. Mental health concerns could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where staff have a concern about a child's mental health that is also a safeguarding concern, they should report and record their concerns in line with this policy.

15.34. Staff should be alert to indicators including:

15.34.1. Significant changes in behaviour

15.34.2. Persistent anxiety or distress

15.34.3. Withdrawal from social situations

15.34.4. Ongoing difficulties sleeping

15.34.5. Self-harm

15.34.6. Neglect of personal care

15.34.7. Expressions of hopelessness or suicidal ideation

15.35. Where staff believe a child is at immediate risk of harm, emergency services will be contacted straight away by either calling 999 or seeking urgent medical assistance.

15.36. Positive mental health is a priority for Thrive Education Partnership. See our Trust Mental Health and Wellbeing Policy for further details.

16. Changes

Description	Date	Page	Section
Whole re-write of policy.	August 2026		