Safeguarding and Child Protection Policy

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Bradford Diocesan Academies Trust

Immanuel College
Church of England Academy

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1. Trust Policy Statement

Bradford Diocesan Academies Trust (BDAT) considers the safeguarding of pupils in all of our schools as the highest priority in our organisation. The Trust is committed to ensuring that everyone working in our schools understands their safeguarding responsibilities.

This Trust-wide policy applies to all staff, including the Board of Trustees, Governors and Central Staff, paid staff, volunteers and sessional workers, agency staff, students or anyone working for and on behalf of the Bradford Diocesan Academies Trust.

As part of our focus on diversity and inclusion, BDAT pledges that our policies will seek to promote equality, fairness, and respect for all staff and pupils. Our policies reflect the BDAT values of inclusion, compassion, aspiration, resilience, and excellence. By working closely with a range of stakeholders, such as our school, union, and HR colleagues, we have ensured that BDAT's policies do not unlawfully discriminate against anybody.

This policy has been implemented following consultation with the recognised trade unions and will be reviewed on an annual basis to reflect changes in local and national guidance.

For the purpose of this policy, the term Trust refers to BDAT. The term school and the term academy are interchangeable. The term pupil and the term student are interchangeable.

2. Introduction

This BDAT Safeguarding and Child Protection Policy has been developed in accordance with the principles established by the Children's Act 1989, the Education Act 2002, the Children's Act 2004, Keeping Children Safe in Education (KCSiE) (September 2025 edition) and in line with locally agreed guidance and procedures.

Bradford Diocesan Academies Trust (BDAT) and the Local Governing Bodies (LGBs) of all academies take seriously their responsibilities under section 157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our schools to identify, assess and support those children and young people who are suffering harm. The following links provide further information, and should be read as necessary:

- Keeping Children Safe in Education - September 2025
- Working Together to Safeguard Children 2023
- What to do if you're Worried a Child is Being Abused - March 2015
- Information Sharing: Advice for Practitioners - May 2024
- Children Act 1989
- Children Act 2004
- Education Act 2002
- Teachers' Standards
- SEND Code of Practice
- Bradford Children and Families Trust Safeguarding Procedures
- West Yorkshire Consortium Inter-Agency Safeguarding and Child Protection Procedures

3. Aims of the Policy

The aims of the BDAT Safeguarding and Child Protection Policy are as follows:

- To protect the children and young people who attend BDAT's schools.
- To provide all staff and volunteers with the overarching principles that guide our approach to safeguarding and child protection; staff and volunteers also need to be au fait with relevant academy policies in situ.
- To support child development in ways that will foster security, confidence, and independence.
- To raise the awareness of staff, volunteers, governors and parents for the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide systematic means of monitoring children known or thought to be at risk of harm.
- To emphasise the need for good levels of communication between all members of staff.
- To develop a structured procedure within the Trust which will be followed by all in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially the Police and Children's Social Services.
- To ensure that all adults who have access to children have been checked as to their suitability.

4. Ethos and Commitment

BDAT believes that a child or young person should never experience abuse of any kind. We all have a responsibility to promote the welfare of children and young people and to keep them safe. We are wholly committed to practice in a way that protects them.

BDAT Trustees are committed to improving outcomes for all children and young people, and this underpins all of the development and work throughout the Trust.

Safeguarding is considered everyone's responsibility and, as such, our schools aim to create the safest environment within which every student has the opportunity to achieve and flourish. We do this by:

- Working in partnership with other agencies and establishing effective working relationships with parents, carers, and other stakeholders.
- Providing learning opportunities throughout our curriculum that equips our students at an age-appropriate level with the skills and knowledge they need to keep themselves safe.
- Enabling all of our students to have their voice heard by giving them mechanisms to speak to trusted adults when they feel concerned or worried.
- Ensuring that all of our staff receive high quality and regular safeguarding training that means they are alert to signs and indicators of abuse and know what to do when they have a concern.
- Recognising that some children are more vulnerable to abuse (e.g. those with Special Educational Needs and Disabilities) and that intervening as early as possible is vital in preventing harm from occurring.
- Implementing child protection procedures when there is a concern that a child has been harmed or is at risk of harm.
- Always operating with a child-centred approach when fulfilling our safeguarding responsibilities and acting in the best interests of the child.

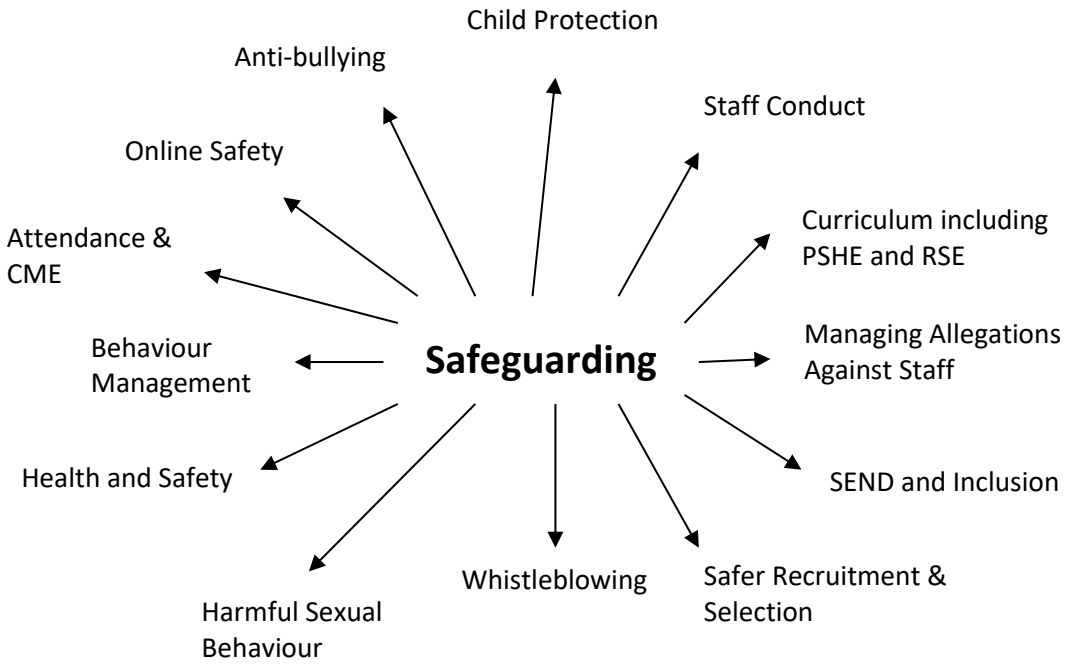
5. Definition of Safeguarding

Safeguarding and promoting the welfare of children is defined as:

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

The term 'Child' or 'Children' includes everyone under the age of 18.

The diagram below demonstrates the wide umbrella of safeguarding and provides some examples of the other policies that relate to safeguarding.



6. The Safeguarding Team at Immanuel College

The Head Teacher is Mr S Mulligan

The Designated Safeguarding Lead (DSL) who takes the lead for Child Protection is Mr J Paterson (Deputy Headteacher)

The Deputy Designated Safeguarding Lead (DDSL) is M S Hacking (Chaplain)

The name of the Designated Teacher for Children who are Looked After is Mr J Paterson (Deputy Headteacher)

The Chair of Governors is Mrs D Sterling

The named Governor for safeguarding is Mrs E Pienaar

If you have a safeguarding concern about a pupil, please make us aware using one of the following means:

Telephone - call 01274 425900 and ask for a designated safeguarding officer. E-mail - safeguarding@immanuel.BDAT-academies.org

Further details about the Immanuel College Safeguarding Team can be found on our website (https://www.immanuelcollege.org/about-immanuel/safeguarding/)

7. Roles and Responsibilities

This section of the policy provides details of the responsibilities of Trustees, Governors and staff in relation to safeguarding.

7.1 Trust Board

The BDAT Trust Board has a legal responsibility to make sure that the schools have an effective safeguarding policy and procedures in place and monitors that the schools comply with them. The Trust Board will do this by:

- receiving and scrutinising biannual reports from the Head of Safeguarding at Trust Board meetings
- nominating a Safeguarding Trustee to provide additional support and challenge to the Head of Safeguarding outside of Trust Board meetings
- maintaining oversight of compliance checks and safeguarding quality assurance activities across all BDAT schools
- engaging with safeguarding training (including online safety) on a regular basis so that they have the knowledge to provide strategic challenge around the Trust's approach to safeguarding
- delegating operational responsibilities to LGBs as defined below and set out in the BDAT Scheme of Delegation

7.2 Local Governing Body (LGB)

The LGB of each BDAT school has a responsibility to make sure that their school has an effective safeguarding policy and procedures in place and monitors that the schools comply with them. The LGB do this by:

- appointing a named Safeguarding Governor who has lead responsibility for oversight of the school's safeguarding arrangements
- receiving and scrutinising a half-termly safeguarding report from the Designated Safeguarding Lead (DSL) at each LGB meeting
- engaging with safeguarding training (including online safety) on a regular basis so that they have the knowledge to provide strategic challenge around the school's approach to safeguarding
- maintaining oversight of and, where appropriate, contributing to compliance checks and safeguarding quality assurance activities in their school

7.3 BDAT Head of Safeguarding

BDAT's Head of Safeguarding is responsible for the strategic leadership of safeguarding across the Trust. They will fulfil this responsibility by:

- ensuring that Trust policies and procedures are reviewed and updated in line with national and local requirements with relevant changes being disseminated to all BDAT schools
- ensuring that there are systems in place to support the effective management of safeguarding across BDAT, especially the role of DSLs, training for all staff and supervision as appropriate

- maintaining up to date knowledge of all aspects of safeguarding through continuing professional development opportunities
- ensuring that there is support and advice available for academy Headteachers and DSLs relating to safeguarding concerns, particularly when they are complex and/or relate to allegations against staff
- ensuring that compliance checks and quality assurance processes are in place to measure effectiveness of safeguarding practice across the Trust
- providing information about safeguarding across BDAT to the Trust Board on a biannual basis so that they can effectively undertake their responsibilities in relation to safeguarding

7.4 Academy Headteachers

The Headteacher in each BDAT school has overall responsibility for the safeguarding arrangements in their school. They will fulfil this responsibility by:

- ensuring that a Designated Safeguarding Lead (DSL) with role specific training forms part of their senior leadership team and that they have sufficient time to undertake the role
- ensuring consistent line management of the DSL takes place so that they are empowered in their role to safeguard and promote the welfare of all pupils
- offering day-to-day support and guidance to the DSL, as well as formal supervision as required
- oversee the promotion of safeguarding throughout their school so that all staff understand their responsibilities and pupils know what to do if they are worried or concerned
- maintaining up to date knowledge of their safeguarding responsibilities as Headteacher
- ensuring appropriate cover is in place in the absence of the DSL
- ensuring that a senior member of staff is in place as the Designated Teacher for Looked After and Previously Looked After Children
- ensuring that pupils are provided with opportunities through the curriculum to learn how to keep themselves safe at all times, including when online
- ensuring all recruitment procedures are undertaken in line with safer recruitment practice in line with the BDAT Recruitment and Selection Toolkit
- ensuring that all staff feel able to raise concerns about poor or unsafe practice and that these concerns are handled sensitively in line with Managing Allegations and Whistleblowing policies, including referral to the Local Authority Designated Officer and Disclosure and Barring Service/Teaching Regulation Agency if necessary
- contributing to compliance checks and safeguarding quality assurance activities in their school
- informing the Trust Executive Team where there is a serious safeguarding incident or an allegation against a member of staff that results in a referral to the Local Authority Designated Officer (LADO)

7.5 Academy Designated Safeguarding Leads (DSLs)

The DSL is a member of the senior leadership team in all BDAT schools and they are responsible for the strategic leadership of safeguarding and child protection in their school. They are supported by a Deputy Designated Safeguarding Lead (DDSL) and, depending on the size of the school, a wider safeguarding team, all of whom are trained to DSL level. The DSL fulfils their responsibilities by:

- ensuring that there is a well-understood, open and efficient mechanism for staff to raise safeguarding concerns about pupils and regularly promote this. This is done through the Child Protection Online Management System (CPOMS) in all BDAT schools

- ensuring that there is a culture of listening to children and all pupils have a means to speak to a trusted adult if they are worried or concerned
- ensuring that they are suitably trained to carry out the DSL role and that this training is kept up to date
- providing the wider staff body with safeguarding training (including online safety) on a regular basis through means including face to face sessions, staff briefings, signposting and other communication methods
- ensuring that all concerns raised (whether by staff, through pupil disclosures or otherwise) are acted upon and written records are kept of actions taken
- considering whether any concerns received need to be referred on to external agencies including Children's Social Care or the Police and doing so without delay if necessary
- offering support to staff who bring concerns and providing appropriate feedback as to the actions taken where appropriate
- maintaining written records of all concerns, actions taken and reasons for these actions using CPOMS, even when there is no need to make an onward referral
- ensuring that all such records are kept confidentially and securely whilst also understanding that information sharing is vital to keeping children safe
- ensuring that school is represented by an appropriate member of staff in all child protection procedures and multi-agency meetings
- following the Bradford Children's Services escalation procedure where they are concerned that a referral or child protection case is not progressing acceptably
- taking lead responsibility for the online filtering and monitoring systems and processes in place at their school
- forging and maintaining effective working relationships with external agencies
- providing information about safeguarding to the LGB on a regular basis so that they can effectively undertake their responsibilities in relation to safeguarding
- working with the BDAT Head of Safeguarding in relation to compliance checks and safeguarding quality assurance activities in school
- consulting with the Headteacher and/or Head of Safeguarding about any complex concerns

Further information about the role of the Designated Safeguarding Lead can be found in KCSIE 2025 Annex C.

7.6 All Staff

The Trust and our LGBs recognise that for this policy to be effective, it is essential that all staff understand what safeguarding is and that know that it is everyone's responsibility. All staff in all of our schools will fulfil this responsibility by:

- engaging with safeguarding training on a regular basis in order to develop their understanding of the signs and indicators of abuse and of their school's safeguarding procedures
- knowing how to respond to a student who discloses abuse
- sharing any safeguarding concerns immediately with the DSL by speaking with them or a member of the safeguarding team and providing a written record on CPOMS
- always operating using a child-centred approach and with the best interests of the child at their heart
- conducting themselves in a professional manner at all times in line with the staff code of conduct
- reading mandatory documentation such as KCSIE Part 1 and Annex B in line with specified timescales

- contributing towards the provision of a safe environment where children can learn, no matter what their job role

8. Providing a Safe and Supportive Environment

8.1 Safer Recruitment and Selection

Throughout BDAT, we ensure that all appropriate safer recruitment measures detailed in KCSIE 2025 Part 3 are applied in relation to everyone who works in the school including volunteers, agency staff and contractors. This includes:

- ensuring that the BDAT Recruitment and Selection Toolkit is used for all recruitment processes and at least one member of every recruitment panel is safer recruitment trained
- carrying out the required checks in relation to an applicant's identity, qualifications, right to work in the UK and obtaining an enhanced DBS and children's barred list check
- obtaining written confirmation from third party organisations that adults who are accessing school sites have been subject to the appropriate checks
- maintaining a Single Central Record in each school and the central team that covers all staff (including supply), governors and trustees, volunteers, contractors and any other third parties who work in school. This record details the dates that all relevant checks were undertaken for each adult
- all staff completing an annual declaration confirming that they have had no convictions since their enhanced DBS check was undertaken.

8.2 Site Security

Visitors to our schools, including contractors and agency staff, will have their ID verified upon arrival and will be asked to sign in. They are given an ID badge that demonstrates that they have been through this process.

All visitors are expected to observe the school's safeguarding and health and safety regulations, which will be shared with them upon their arrival.

The Headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site based upon the written confirmation relating to the checks that have been undertaken in relation to their suitability to work with children.

8.3 Safer Working Practice

The Teaching Standards state that teachers, including Headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. All staff who work within our schools are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.

In accordance with the Safer Working Practice Consortium's 'Guidance for Safer Working Practice for those with Children and Young People in Education Settings' (February 2022) and linked to our Staff Code of Conduct and Whistleblowing Policy; safe working practices in our schools ensure that pupils are safe and that all staff:

- understand their responsibilities to safeguard and promote the welfare of pupils

- are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- should work, and be seen to work, in an open and transparent way including self-reporting if their conduct or behaviour falls short of these guiding principles
- should acknowledge that deliberately invented/malicious allegations are rare and that all concerns should be reported and recorded
- should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation
- should not consume or be under the influence of alcohol or any other substance, including prescribed medication, which may affect their ability to care for children
- should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure and Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct, prohibition from teaching by the Teaching Regulation Agency (TRA)
- should continually monitor and review practice to ensure this guidance is followed
- should be aware of and understand this safeguarding and child protection policy, arrangements for managing allegations against staff, the staff code of conduct, whistleblowing procedures and the procedures of the local safeguarding children partnership

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Further details can be found in the BDAT Whistleblowing Policy.

No disciplinary action will be taken against any member of staff who acts in good faith in reporting concerns about a colleague. If the staff member or volunteer feels unable to raise a concern within school or to the Trust, or feels that their genuine concerns are not being addressed or taken seriously, they can contact the NSPCC Whistleblowing Helpline (0800 028 0285: 8.00am – 8.00pm Mon to Fri; email address: help@nspcc.org.uk).

8.4 Risk Assessments

Risk assessments are taken seriously and used to good effect to promote safety. Risk assessments are available for all aspects of work in BDAT schools including, but not limited to, premises and equipment, on-site activities, off-site activities, venues used and transport. Where relevant, risk assessments are carried out for individual pupils, and supported by action plans identifying how potential risks would be managed.

Individual risk assessments are also used when deciding a response to a child demonstrating potentially harmful behaviour such as sexually harmful behaviour, or when identifying whether a child may be particularly vulnerable, such as a child at risk of Child Sexual Exploitation.

8.5 Pupil Information

In order to keep children safe and provide appropriate care for them, all BDAT schools require accurate and up to date information regarding:

- names, contact details and relationship to pupils of any persons with whom the child normally lives
- names and contact details of all persons with parental responsibility (if different from above)

- emergency contact details (if different from above), ensuring that if the person(s) with parental responsibility is unable to collect their child, this emergency contact could collect them and keep them safe until either the person(s) with parental responsibility is available or a more suitable arrangement is made. We strongly encourage all parents and carers to provide more than one emergency contact, providing the school with additional options to make contact with a responsible adult when there are absence, welfare and/or safeguarding concerns
- details of any persons authorised to collect the child from school (if different from above)
- any relevant court orders in place including those which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- if the child is or has been subject to a Child Protection Plan
- if the child is or has been subject to the Early Help or Child In Need (CIN) processes
- if the child is a Child Looked After by the local authority (CLA), also known as a child in care, or has been previously looked after
- the name and contact detail of their G.P.
- any other factors which may impact on the safety and welfare of the child

We will collate, store and agree access to this information, ensuring all information held electronically is stored securely with due regard to meeting the requirements of the Data Protection Act 2018, UK GDPR and safeguarding requirements.

8.6 Safeguarding Information for Pupils

We are committed to ensuring that all of our pupils are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. We aim for all pupils to know that there is a Designated Safeguarding Lead (DSL) in their school, who is a senior member of staff with responsibility for child protection.

Likewise, pupils are informed in an age-appropriate way that there is a Deputy DSL and safeguarding team who they can talk to if the DSL was not in school. We inform all pupils of whom they might talk to, both in and out of school, their right to be listened to and heard and what steps can be taken to protect them from harm.

We recognise that some of our pupils may have additional needs that impact upon their ability to communicate. Our safeguarding teams will explore all options, taking advice from the SENDCO as required, to ensure that the voices of all children are heard, verbally or otherwise.

Where there are any concerns, children will be given a proper explanation (appropriate to age and understanding) of what action is being taken on their behalf and why.

Pupils in our schools are treated with dignity and respect and their views are listened to. Our arrangements for consulting with and listening to pupils are through a range of student voice activities and student leadership opportunities that are determined by leadership teams in each academy.

Safeguarding is a priority reflected in the curriculum, which is used to educate pupils about safeguarding issues and is tailored to local concerns in each of our schools. For more information about contextual safeguarding across BDAT, please see **Appendix One**. A more localised and specific version can be found in each of our school's versions of this policy to reflect the particular context of their school community.

8.7 Partnership with Parents

BDAT shares a purpose with parents to educate and keep children safe from harm.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission to do so, or it is necessary to do so, in order to protect a child.
We will share with parents or those persons with parental responsibility, any concerns we may have about their child unless to do so may place a child at increased risk of harm.

The DSLs in our schools will consult with Bradford Children's Social Care where safeguarding concerns arise that require the advice or guidance from other safeguarding professionals. Where students do not live in Bradford, the respective children's services will be contacted in the local authority in which they live.

We encourage parents to discuss any concerns they may have with a member of the safeguarding team in their child's school and we encourage parental feedback to our schools on safeguarding concerns.

We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents. The DSL will determine which members of staff "need to know" personal information and what they "need to know" for the purpose of supporting and protecting the child.

Schools make parents aware of our Safeguarding and Child Protection Policy and ensure that this policy and others are accessible at all times via the school and Trust websites. Posters, displays, newsletters, social media and other communication means also ensure that safeguarding has a high profile throughout every BDAT school.

8.8 Multi-Agency Working

Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies should ensure that schools contribute to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard, promote the welfare and protect the safety of children.

BDAT has both a duty and clear powers to share, hold and use information for these purposes. Further detail can be found in the following government guidance: Information Sharing: Advice for Practitioners - May 2024.

We recognise that it is essential to establish positive and effective working relationships with other agencies. Agencies that we work with across our schools to promote a safe and supportive environment for our students include but are not limited to:

- Bradford Children's Social Care
- Police

- Health
- Child and Adolescent Mental Health Service
- Barnardos
- School Nursing Team
- National Youth Advocacy Service
- Youth Justice Service
- Young Carers
- Early Help

Safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role they **must** set out how they will work together and with any relevant agencies. Bradford Children and Families Trust Safeguarding Procedures and West Yorkshire Consortium Inter-Agency Safeguarding and Child Protection Procedures provide more information as to how this operates.

As a Trust we will cooperate with Children's Social Care where they are conducting child protection enquiries. Furthermore, our DSLs will endeavour to attend appropriate multi-agency meetings such as Early Help Plans, Team Around the Child meetings, Child In Need meetings, Initial and Review Child Protection Case Conferences, and Children Looked After (CLA) reviews. We will provide written reports as required for these meetings and, wherever possible, these reports will be shared with parents prior to the meetings. We appreciate that attendance and contribution to these meetings may require key members of staff to be contactable and available during school holidays.

Where partner agencies such as the police and/or social care attend our schools to conduct enquiries under section 47 of The Children Act 1989, the DSL will inform the Headteacher as to the nature of the enquiries. Consideration will always be given to the requirement for children to have an appropriate adult present.

DSLs throughout BDAT are aware of the requirement in the Police and Criminal Evidence Act 1984 for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The DSL (or their deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded via CPOMS.

If having been informed of the vulnerabilities, the DSL (or their deputy) does not feel that the officer is acting in accordance with PACE, they will ask to speak with a supervisor or contact 101 to escalate their concerns.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult means, in the case of a child:

1. The parent/carer or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. A social worker of a local authority
3. Failing these, some other responsible adult aged 18 or over who is not:
    a. a police officer;
    b. employed by the police;
    c. under the direction or control of the chief officer of a police force; or
    d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the following guidance: PACE Code C 2019 and DFE Guidance on Searching, Screening and Confiscation - July 2022.

8.9 Staff Training

All BDAT staff will receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do in their school if they have a concern.

All BDAT staff will undertake training each September covering as a minimum:

- Signs and symptoms of abuse and neglect
- School level procedures for responding to concerns
- Responding to child-on-child abuse
- Online safety including their role in relation to filtering and monitoring systems
- Their school's behaviour policy
- Their school's response to children that go missing in education
- Recognising and responding to concerns relating to Female Genital Mutilation
- The staff code of conduct, whistleblowing and allegations management processes

All BDAT staff will be made aware of the increased risk of abuse to certain groups of pupils, including but not limited to children with special educational needs and disabilities, children looked after by the local authority, children previously looked after by the local authority, and young carers.

Staff are also made aware of risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, child on child abuse, sexual harassment and sexual violence in school, extremism, female genital mutilation and honour based abuse; and will receive training in relation to keeping children safe online.

This training is replicated through the induction process for any members of staff who join BDAT during the academic year.

All BDAT staff are provided with a copy of the following policies on an annual basis and must sign a declaration to say that they have received, read and understood them:

- KCSIE 2025 Part 1 and Annex B
- Their school's version of this Safeguarding and Child Protection Policy
- Their school's behaviour policy

- Procedures for managing children who are missing education
- Staff Code of Conduct
- Whistleblowing Policy

In all BDAT schools, the DSL, their deputy and any other members of the safeguarding team will attend formal training every two years. This training will include up to date information about local safeguarding partnership inter-agency procedures.

In addition, our DSLs and their teams will update their knowledge and skills at least annually to keep up with any developments relevant to their role and will be supported to access inter-agency training as part of their continuing professional development.

Safeguarding and child protection training will be provided to governors and trustees annually by the BDAT Head of Safeguarding.

8.10 Alternative Provision including Work Placements

BDAT is committed to safeguarding our children even when they access their education in alternative provision for a period of time within the school day/week. The BDAT Head of Safeguarding completes safeguarding quality assurance at all alternative providers used by our schools.

Our schools seek written reassurance that any alternative provision provider has acceptable safeguarding practices in place including; their response to concerns about a child; safer recruitment processes; attendance and child missing education procedures; and appropriate information sharing procedures. We ensure that we have written confirmation as to the location our pupils will be accessing education at all times, noting that some providers operate across multiple sites.

We also obtain a written statement from the provider that they have completed all the vetting and barring checks that are necessary on their staff, and that they will do so if any new staff are employed after a pupil's placement has started.

When organising work placements the school will ensure that the placement provider has policies and procedures in place to safeguard students.

All placements where pupils access their education in alternative settings will be kept under regular review (at least half-termly) to ensure that they continue to meet the needs of the pupils attending and continue to be safe.

Further information can be found in Alternative Provision Statutory Guidance - January 2013 and the BDAT Alternative Provision Statement.

8.11 Use of School Sites for Out-of-Hours Activities

When out-of-school hours activities are provided and managed by our schools, all relevant policies and procedures, including this Safeguarding and Child Protection Policy, will apply.

If other organisations deliver services or activities on BDAT premises, our schools will ensure that they have appropriate safeguarding processes in place, including rigorous checks on the suitability of the adults involved to work with children. This will also involve verifying the existence of suitable safeguarding and child protection policies.

In cases where such arrangements are established, our schools will also facilitate effective communication and collaboration between the provider and our academy on safeguarding matters.

Safeguarding requirements will be incorporated into the service level agreements, and failure to comply will lead to termination. We will consult the guidance on Keeping Children Safe in Out-of-School Settings: Code of Practice – September 2023 to outline the expected safeguarding arrangements for these providers.

In the event that an allegation is made against an adult involved in delivering services or activities on one of our school premises, we will apply the BDAT Managing Allegations and Low Level Concerns Policy.

9. Allegations and Safeguarding Concerns about Staff, Volunteers and Third Parties

BDAT takes allegations against members of staff very seriously and acknowledges that if concerns are not addressed as early as possible, they can create unsafe working environments and leave staff and children increasingly vulnerable.

Where an allegation is made against any person working in or on behalf of the school, or a person using the school premises as an out-of-school setting, the procedures detailed in Keeping Children Safe in Education 2025 (Part 4) and the BDAT Managing Allegations and Low Level Concerns Policy will be followed.

Concerns about colleagues in the context of pupil welfare and safeguarding may arise in a number of ways, for example (but not limited to):

- poor attitude or practice that potentially impacts on the general well-being of children and that needs addressing;
- aspects of poor practice witnessed by others;
- staff speaking against the ethos of the academy;
- non-compliance with trust's policies and procedures relating to safeguarding.

More specifically, allegations may be made against an adult working within the Trust by a child or colleague in relation to abuse. All of the above will be seen as reportable matters, and discussions must take place without delay with the Headteacher.

Both allegations that meet the harm threshold for a referral to the Local Authority Designated Officer (LADO) and allegations/concerns that do not meet the harm threshold, referred to as 'low level concerns', will be reported by staff to the Headteacher in their school and a written record will be made detailing the nature of the allegation/concern, the actions taken and the reasons for decision-making.

9.1 Managing Allegations that may Meet the Harm Threshold

The harm threshold is where a concern or allegation indicates that an adult has:

1. behaved in a way that has harmed a child, or may have harmed a child;
2. possibly committed a criminal offence against or related to a child;

3. behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
4. behaved or may have behaved in a way that indicates they may not be suitable to work with children;

Staff should share, without delay, any allegations/concerns that may meet the harm threshold with the Headteacher so that a referral can be made to the LADO. If the concern is about the Headteacher, staff should report the concern to the Chair of their school's LGB.

In the case of allegations/concerns relating to a member of the BDAT Central Team, they should be directed to the Chief Executive Officer (CEO). If the concerns are relating to the CEO, they should be reported to the Chair of the Trust Board.

It is important to note, however, that anyone can contact the LADO if they need to do so for advice or support, especially if their concerns relate to the conduct of management with children and young people or holistic organisational practice.

Whilst we acknowledge such allegations may be false, malicious, or misplaced, we also acknowledge that they may be founded and shall therefore be treated with respectful uncertainty, investigated properly and in line with agreed procedures of the Local Authority Designated Officer (LADO) for Bradford.

Internal decisions in such cases should never be finalised without the advice of the LADO. If a referral to LADO, Children's Social Care, or anyone else is not made, the decision, rationale for the decision and the name and post of the decision maker must be recorded.

The needs of the child or children will remain at the centre of all action taken. With this in mind, any referral to the LADO will also be accompanied by consultation with Children's Social Care. This is to establish from the outset whether the concerns identified meet the threshold for a Section 47 child protection investigation and/or the police in respect of any criminal investigation.

Allegations of historical abuse should be responded to in the same way as contemporary concerns. In such cases, it is important to find out whether the person against whom the allegation is made is still working with children and if so, to inform the person's current employer or voluntary organisation or refer their family for assessment.

9.2 Managing Concerns that do not Meet the Harm Threshold

As part of the BDAT approach to safeguarding, we will encourage an open and transparent culture to identify concerning, problematic or inappropriate behaviour early, thereby minimising the risk of abuse and harm to children. This will help to ensure that adults working in or on behalf of our schools, or using the school premises as an out-of-school setting, are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

Lower-level concerns and allegations that do not meet the harms test could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone in contravention to policy

- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- acting in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work

Low-level concerns about a member of staff should be reported to the Headteacher, without delay, in line with the BDAT Managing Allegations Procedures.

Where lower-level concerns and allegations that do not meet the harms test are reported or identified, BDAT will ensure that they are appropriately dealt with and recorded. Where considered relevant, we will ensure parents/carers are informed.

It would not be unusual for people to know and believe that practice is not acceptable, but feel unable to respond because of the fear:

- they might not be right to have the concerns that they do
- for their own job and prospects if they report another colleague
- of isolation by other staff
- about what might happen to the member of staff in the long term

It is particularly difficult if staff members are also close friends and/or partners in a relationship. The reasons why staff may not wish to report their colleagues have to be understood.

It must be recognised that the child's welfare always remains paramount, and it can be very easy to lose sight of the impact on others of being on the receiving end of unacceptable and sometimes illegal behaviour.

Issues about attitude and poor practice may be dealt with internally and as part of the member of staff's professional development. If such low level concerns, however, are persistent and any plan with that member of staff has not brought about the necessary improvement, advice from the LADO should be sought, and appropriate people included in the decision-making process.

10. Recognising Abuse and Other Safeguarding Concerns

BDAT staff and other adults in school are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.

This section of the policy provides details about the different types of abuse as well as other specific safeguarding issues that are included in KCSIE 2025.

10.1 Children who may be Particularly Vulnerable to Abuse

Some children may be at an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that all pupils throughout BDAT receive equal protection, we will give special consideration to children who are:

- disabled or who have special educational needs
- young carers who undertake caring responsibilities within their family
- affected by parental substance misuse, domestic abuse or parental mental health needs
- misusing substances
- suffering with a mental health need
- asylum seekers
- vulnerable to being bullied or engaging in bullying
- homeless or living in temporary accommodation
- living transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, gender identity, religion, disability or sexuality
- at risk of exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage or honour based abuse
- within the court system
- have a family member in prison
- at risk of being drawn into extremism
- persistently or severely absent from education
- in receipt of multiple suspensions or at risk of permanent exclusion

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

BDAT recognises that vulnerability can be experienced by children at different times in their life for different reasons. Our schools are vigilant in recognising potential vulnerability as it emerges and acting swiftly to put support in place for children and families.

10.2 Types of Abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation (see 10.4).

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adults and by other children and young people, known as child-on-child abuse. Keeping Children Safe in Education - September 2025 and Working Together to Safeguard Children 2023 refer to four categories of abuse:

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

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

are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

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 a 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 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.

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 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 (including via the internet). 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.

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 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.

10.3 The Prevent Duty

Children are vulnerable to extremist ideology and radicalisation. Just like any other form of abuse, protecting them is a vital part of our approach to safeguarding throughout BDAT.

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

This definition was updated by the government in March 2024 to provide a stricter characterisation that government can use to make sure that extremist organisations and individuals are not being legitimised or given a platform through their interactions with government. It reads:

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. *negate or destroy the fundamental rights and freedoms of others; or*
2. *undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or*
3. *intentionally create a permissive environment for others to achieve the results in (1) or (2).*

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

Under the Counter-Terrorism and Security Act 2015, we are aware that we must have due regard to the need to prevent people from being drawn into terrorism, and that this is known as the Prevent Duty.

In order to fulfil the Prevent Duty, staff in all of our schools have received training to help them to identify children who may be vulnerable to radicalisation, and BDAT is committed to accessing further training to ensure that all staff are up to date and aware of this duty. Further information can be found in the BDAT Prevent Policy.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online, so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

If staff do identify children for whom this may be a concern, they will apply the usual referral process and pass this information to the DSL in their school with immediate effect.

The DSL will contact the local authority's Prevent Coordinator should there be concerns about a child or family linked to potential radicalisation or extremism. The Prevent Coordinator will then assist the DSL regarding whether a referral is appropriate and whether this child or family will need to be referred to the Channel Panel.

The Prevent Team can be contacted as follows:
Danielle King (Prevent Coordinator) – Danielle.king@bradford.gov.uk
Assia Hussain (Prevent Education Officer) – assia.hussain@bradford.gov.uk

All BDAT schools will also incorporate the promotion of fundamental British Values into the PSHE curriculum in order to help build pupils' resilience and enable them to challenge extremist views. We

will provide a safe space in which children and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

Radicalisation will also be considered within current online safety policies, procedures and curriculum in terms of having suitable filtering and monitoring in place and also raising awareness with staff, parents and children about the increased risk of online radicalisation, through the use of the internet, artificial intelligence, social media and gaming.

10.4 Child Exploitation

Criminal Exploitation (CCE) including County Lines
BDAT recognises that specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators may threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons for a sense of protection and may often commit crimes themselves. Such vulnerability is not always recognised and victims may be criminally exploited even if the activity appears to be something they have agreed to or consented to.

Criminal exploitation of girls can be different from boys with girls often being at a higher risk of sexual exploitation.

Key indicators to identifying potential involvement in child criminal exploitation involve:

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

Child Sexual Exploitation (CSE)
BDAT is aware that Child Sexual Exploitation (CSE) 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.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge. CSE can affect any child who has been coerced into engaging in sexual activities including 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited.

Staff throughout BDAT have been made aware of some of the key indicators of CSE through annual basic awareness safeguarding training. In addition, we appreciate that we have a role to play in the prevention of CSE through educating our students via the PSHE curriculum.

If staff do identify children for whom CSE may be a concern they will follow normal safeguarding process and child protection procedures. Staff must pass this information to the DSL immediately. The DSL will then assess the level of concern and consider referring cases where relevant to children's social care and the Child Exploitation (CE) Hub.

We also appreciate that we have a role to play in sharing intelligence relevant to perpetrators of CSE, and therefore if such information should come to light within school, the DSL will share this appropriately with the police.

Further information about this topic can be found in DFE Guidance on Child Sexual Exploitation.

Child Financial Exploitation (CFE)
BDAT recognises that children can also be exploited financially. It can take many forms, use different types of currency and often involves fraud or money laundering. Children anywhere can be a victim of this crime and it can take place both online and offline.

Criminals may trick children into sharing their bank details, persuade children to hold money that has been obtained illegally, or actively involve children in scams.

Financial exploitation can be linked to other types of abuse. For example, children may be groomed into sharing indecent images of themselves online and then blackmailed for money in order to stop the images being shared publicly. This is known as sextortion.

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.

Tackling modern slavery is a complex process involving partner agencies. We have a part to play in identifying signs and indicators of this form of exploitation and ensuring appropriate referrals are made through the DSL to the Police, Children's Social Care and the National Referral Mechanism.

10.5 Female Genital Mutilation (FGM)

BDAT understands that Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia, and know that FGM is illegal in the UK, is a form of child abuse and has long-lasting harmful consequences.

We are aware that 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 years of age. This mandatory duty commenced in October 2015.

Staff are trained in the awareness of the indicators of FGM. If they were to directly observe (e.g. if involved in intimate care) or indirectly become aware of other potential indicators, they must follow the normal safeguarding process, passing this information to the DSL immediately. The DSL will then

assess this information and support the staff member in reporting the concerns to the Police as per their mandatory reporting duty, as well as making a referral to Children's Social Care.

Staff will not undertake any examination of a student.

10.6 Domestic Abuse

BDAT understands that the cross-government definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to: psychological, physical, sexual, financial and emotional harm.

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, wellbeing, development, and ability to learn.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

If staff do identify children for whom domestic abuse (DA) may be a concern, they must follow the normal safeguarding process, passing this information to the DSL immediately. The DSL will then refer cases where relevant to Early Help or Children's Social Care and share information where necessary with the Domestic Abuse Hub within the context of the daily Multi-Agency Risk Assessment Conference meetings.

Where notifications are received from the Domestic Abuse Hub, this information will be added to a child's chronology and child protection record to ensure that appropriate support can be provided where necessary.

Operation Encompass

Operation Encompass is an initiative that directly connects the police with schools to ensure better outcomes for children who are subject or witness to police-attended incidents of domestic abuse.

One of the principles of Operation Encompass is that all incidents of domestic abuse are shared with schools, not just those where an offence can be identified. It is a system that provides rapid support within the school environment meaning children are better safeguarded against the short, medium and long term effects of domestic abuse.

Operation Encompass provides an efficient, confidential channel of communication between the police, via the Domestic Abuse Hub, to the Designated Safeguarding Lead in school. This enables the immediate and discrete recognition of the child's situation by key school staff, ensuring a secure and sympathetic environment is provided and the broader effects of abuse are addressed.

This information is shared by the Police with schools regardless of whether parental permission to share the information has been provided at the time of Police attendance at the domestic incident.

All records are managed at Child Protection level and are recorded securely and directly onto the individual child safeguarding record in school in full accordance with General Data Protection Regulations (GDPR 2018) and the Data Protection Act 2018.

10.7 Honour Based Abuse

BDAT recognises that so-called 'honour-based' abuse (HBA) 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. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

10.8 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. 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 perpetrators use perceived cultural practices to coerce a person into marriage.

In addition, 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.

Schools and colleges can play an important role in safeguarding children honour-based abuse.
Staff throughout BDAT receive training to understand that honour-based abuse including forced marriage is a safeguarding concern and they will follow the normal safeguarding process and child protection procedures by passing any concerns to the DSL immediately. The DSL will then assess this information and where necessary make appropriate referrals to Children's Social Care and the Police.

In dealing with such a concern the safeguarding team will work with other safeguarding agencies following government's Right to Choose Guidance.

10.9 Child-on-Child Abuse

BDAT understands that children can, and sometimes do, abuse other children (sometimes referred to as child-on-child abuse). This can happen both inside and outside of school and online.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);

- abuse in intimate personal relationships between peers;
- physical abuse such as 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);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- 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;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth involved sexual imagery). This may also include the use of artificial intelligence to create fake images or videos of this nature;
- upskirting or down-blousing, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals, breasts or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Staff throughout BDAT have received training in recognising the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

Our staff understand that even if there are no reports of such abuse in school it does not mean it is not happening, it may be the case that it is just not being reported. Staff are aware that it is important that if they have any concerns regarding child-on-child abuse, they speak to the Designated Safeguarding Lead.

All BDAT staff are trained to understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Staff are clear that whilst these may be responded to through behaviour management processes, there is also a need for this information to be shared with the DSL in order to address any underlying safeguarding concerns.

Our staff are particularly vigilant of pupils with identified SEND and those experiencing other vulnerabilities who may be particularly susceptible to child-on-child abuse.

Child-on-child abuse often meets the threshold for the recording and investigation of criminal offences by the Police and should never be considered as 'just banter' or 'part of growing up'.

Staff becoming aware of any incident of child-on-child abuse must follow the normal safeguarding process by passing this information to the DSL immediately. The DSL will assess this information and, where necessary, make appropriate referrals to Children's Social Care and potentially the Police, should criminal offences be identified.

Child-on-child allegations that do not meet the threshold for police investigation will be subject of internal school investigation by the DSL and/or senior leaders at the school. This will involve speaking to the victim and any witnesses to secure accounts of the allegation. All findings including any additional information secured, will be considered when making decisions around resolution of the allegation. Outcomes may involve application of the school behaviour policy.

BDAT recognises that victims of child-on-child abuse need to be supported and, with parental consent, may secure external agency support where this is deemed appropriate. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe.

A victim should never be given the impression that they are creating a problem by reporting child-on-child abuse, nor should a victim ever be made to feel ashamed for making a report.

We also recognise that perpetrators of child-on-child abuse may have identified unmet needs of their own and, with parental consultation, may secure external agency support where this is deemed appropriate.

A bespoke helpline is available for children and young people who have experienced abuse at school, and for worried adults and professionals who may need support and guidance. If they are concerned about something, they can contact the NSPCC helpline: Report Abuse in Education on 0800136663 or email help@nspcc.org.uk.

Appendix Four provides information about the initial response to a disclosure of child on child abuse and further information can also be found in Part 5 of KCSIE 2025.

10.10 Youth Involved Sexual Imagery

Where there is a disclosure from a pupil and/or we become aware that a child may have been involved in sending 'youth involved sexual imagery' which is sometimes referred to as 'sexting' or sending 'nudes or semi nudes', our schools will refer to the guidance in the UKCIS document 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

Our staff understand that when youth involved sexual imagery comes to their attention:

- The incident must be referred to the DSL immediately
- The DSL should hold an initial review meeting with appropriate school staff
- There will be subsequent interviews with the young people involved (as appropriate)
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- The DSL will assess the information available and with the use of appropriate risk assessment tools, decide the appropriate response by the school to such an incident. The Bradford Partnership Harmful Sexual Behaviour Protocols may be useful in this process.
- If at any point in the process it has been established a young person has been harmed or is at risk of harm, or such behaviour involves a young person communicating with an adult, then a referral will be made to Children's Social Care and/or the Police immediately

Staff should never intentionally view any youth involved sexual imagery. This decision can only be taken by the DSL in exceptional circumstances where it is necessary to safeguard a child and will be done so in line with the DFE guidance linked above.

10.11 Sexual Violence and Harassment

Sexual violence and sexual harassment involving children is a form of child-on-child abuse. It can occur between children of any age and sex. It can happen inside or outside of school and online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and offline.

Children with Special Educational Needs and Disabilities (SEND) are 3 times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and
- communication barriers and difficulties overcoming these barriers.

Any reports of abuse involving children with SEND in our schools will therefore require close liaison between the DSL and the SENDCO.

BDAT staff are made aware through safeguarding training of the specific stance to take on this subject including:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras, and lifting up skirts.

Staff awareness training also includes:

- raising awareness that not recognising, acknowledging, or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it
- understanding that all of the above can be driven by wider societal factors beyond our schools, such as everyday sexist stereotypes and everyday sexist language

Each school within BDAT ensures that a whole school approach is taken to such safeguarding concerns and includes preventative education through the school PSHE/RSHE curriculum.

Where there is an incident, all staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating

a problem by reporting abuse, sexual violence, or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

Sexual violence involves the criminal sexual offences defined in the Sexual Offences Act 2003 which include: Rape, Assault by Penetration, Sexual Assault and Causing someone to engage in sexual activity without consent.

In relation to the issue of consent the following legal definitions apply:

- a child under the age of 13 can never consent to any sexual activity
- the age of true consent is 16
- sexual intercourse without consent is rape

Sexual Harassment is defined as unwanted conduct of a sexual nature and can include online behaviour. BDAT takes all such reports seriously and they will receive the same high standard of care that any other safeguarding concern receives.

A multi-agency approach will be undertaken when responding to all such concerns, however, our schools will always take immediate action to protect children despite the actions of any other agency.

These actions may include an immediate safety plan in respect of the needs of the victim and will address any risks identified to any child in respect of an alleged perpetrator of sexual violence or sexual harassment to ensure children are protected from harm.

Any safety plan or risk assessment will be fluid and may change to reflect developments during the management of the case.

All such reports will be managed by the Designated Safeguarding Lead in line with KCSIE 2025 Part 5 guidance.

There are a number of options we may consider in respect of the management of a report of sexual violence or sexual harassment between children and each case will receive an appropriate bespoke response once all the facts are known.

Irrespective of any potential criminal outcome, we have a duty to safeguard all children and may deal with any such report on a balance of probability basis when considering the outcomes for the children involved. Should an outcome involve a move to an alternative school for any child, then full information sharing of the case will be undertaken with the Designated Safeguarding Lead professional at that school.

Appendix Four provides information about the initial response to a disclosure of child-on-child abuse and further information can also be found in Part 5 of KCSIE 2025.

10.12 Attendance and Children Absent from Education

BDAT promotes good attendance and understands that persistent or unexplainable absences can be an indicator for children with welfare and safeguarding concerns. Knowing where our pupils are during school hours is an extremely important aspect of our safeguarding practice. Consequently, in all of our schools we ensure that information is shared between the DSL and those responsible for attendance.

Our staff are aware that patterns in absence can be indicators of safeguarding concerns such as child exploitation and are alert to the signs of children who may be at risk of travelling to conflict zones or honour based abuse.

Likewise, our schools understand that a parent failing to inform us that a child has an authorised absence could be a cause for concern and thus will follow their local attendance procedures in these circumstances in order to locate the child and ensure that they are safe. In line with best practice, all of our schools expect to have at least two emergency contact numbers for every pupil and threefor those in the Early Years.

All BDAT schools have a duty to investigate unauthorised absences to establish if safeguarding concerns are evident and we also recognise that Bradford Local Authority has a statutory duty to ensure that all children and young people of compulsory school age receive suitable and appropriate education. We will, therefore, support the Local Authority in ensuring that this duty is carried out effectively.

Our schools all pay due regard to the DFE Guidance on Working Together to Improve School Attendance in the way that attendance at school is promoted and managed at local level.

There are specific duties in respect of Children Missing Education (CME) and there are strict guidelines in respect of both the definition of CME and the legalities of deleting a pupil from a school roll as per the following guidance:

DFE Guidance on Children Missing Education
The School Attendance (Pupil Registration) (England) Regulations 2024

Where a pupil leaves one of our schools**,** the Local Authority will be notified as soon as grounds for the deletion are met but no later than when the name is deleted from the register. The grounds for deletion include where a pupil:

- has been taken out of school by their parents and is being educated outside the school system e.g. is in elective home education
- has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered
- has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age
- is in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning at the end of that period
- has been permanently excluded

10.13 Serious Violence

Staff throughout BDAT are aware of the indicators which may signal children are at risk from, or are involved with serious violent crime. These may include but are not limited to 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.

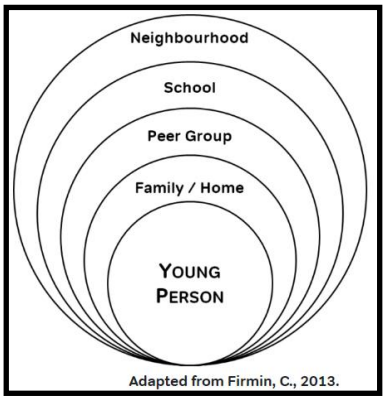
Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Factors which heighten risk and increase the likelihood of involvement in serious violence, include 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.

Our response to such concerns will involve a partnership approach, which may involve referral into Children's Social Care, the Police and other partnership services.

10.14 Contextual Safeguarding

Contextual safeguarding is an approach to understanding and responding to young people's experiences of harm beyond their families. It recognises the different relationships that young people form in school, their communities and online can feature safeguarding risks that could cause them harm.



Parents and carers can have little influence over these extra-familial contexts so it is important that professionals work in partnership to assess contextual safeguarding risks and provide intervention that can keep young people safe from harm.

BDAT recognises that all of our schools have different contextual safeguarding risks depending on factors including the communities they serve and their physical location. For more information about contextual safeguarding across BDAT, please see **Appendix One**. A more localised and specific version can be found in each of our school's versions of this policy to reflect the particular context of their school community.

All staff are made aware of the contextual safeguarding risks at their school through training and should report any concerns to the DSL via CPOMS in line with normal safeguarding procedures.

10.15 Children with Family Members in Prison

BDAT understands that children who have members of their family in prison are more likely to underachieve and fail to reach their potential than their peers and may require specific services and support.

Families and children of people in prison will be seen as families first and our schools will work to ensure their needs are appropriately met. This will include providing support to ensure the voice of the child is considered when seeking contact with a family member in prison.

10.16 Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them, or for crimes they have witnessed. The families of children may also be subject to child arrangements processes through the family court system.

We recognise that both circumstances may be stressful for children and appropriate support will be provided in line with local and national guidance.

10.17 Homelessness

BDAT are aware that being homeless or being at risk of becoming homeless presents a real risk to the welfare of a child. Indicators that a family may be at risk of becoming homeless include household debt, rent arrears, domestic abuse and anti-social behaviour.

We recognise that referrals to Bradford Housing Options Service may be necessary. Concerns around homelessness may also require an accompanying referral to Children's Social Care where welfare concerns are identified, or a child has been harmed or is at risk of harm.

In some cases in our secondary schools, children over the age of 16 could be living independently of their parents or carers, for example through exclusion from the family home. Where this situation is identified, Children's Social Care will be the lead agency and the DSL at school will ensure that an appropriate referral has been made to them in the first instance.

The Homeless Reduction Act 2017 places a legal duty on councils to provide advice and support.

10.18 Private Fostering

A 'privately fostered' child is a child under the age of 16 (18 if disabled) who is cared for and accommodated by someone other than a parent or close relative for more than 28 consecutive days.

We recognise that any child separated from their parent is potentially vulnerable and thus there is a responsibility to ensure that the alternative care meets their welfare and safety needs.

The parents or those with parental responsibility and the private foster carer have a duty to notify the local authority of this arrangement.

In accordance with Part 9 of The Children Act 1989, where a private fostering arrangement is identified in respect of any child, we will inform the local authority of such an arrangement in order to ensure the child will be satisfactorily safeguarded and their welfare promoted.

10.19 Mental Health

Throughout BDAT, our staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only trained professionals should attempt to make a diagnosis, however, our school staff are well placed to observe children on a day-to-day basis and identify behaviour that might suggest a child is experiencing a mental health problem or be at risk of developing one.

Where children have suffered potentially harmful adverse childhood experiences, this can have a lasting effect throughout childhood and into their adult life.

All concerns identified about child mental health problems identified by a member of staff will be referred to the DSL via CPOMS so the most appropriate follow up action can be taken.

There are a number of services with access to trained professionals that are available to support schools across Bradford and school staff are best placed at local level to work with parents and carers to help children access the most appropriate support.

10.20 Online Safety including Filtering and Monitoring

BDAT recognises that it is essential our pupils are safeguarded in the online world. Each of our schools has a standalone Online or E-Safety Policy that details their whole school approach to protecting and educating their pupils in the use of technology and online.

The breadth of issues classified within online safety is considerable and ever evolving, particularly given the rapid development of generative artificial intelligence tools which can exacerbate these issues. These risks can be categorised into four areas, known as the four Cs:

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

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Staff throughout BDAT receive training around online safety as part of their safeguarding training. Concerns are reported to the DSL in their school via CPOMS in the same way as other safeguarding issues.

Filtering and Monitoring

Online filtering and monitoring systems are essential in safeguarding pupils online throughout BDAT. Throughout the Trust we use Smoothwall Filter, a cloud-based web filter that is designed specifically for schools and is part of the Internet Watch Foundation. Smoothwall Filter blocks internet access to harmful sites and inappropriate content and meets all technical requirements set out by the DFE Digital and Technology Standards. It is our goal to strike a balance between maintaining a secure online environment and minimizing any disruptions to teaching and learning activities.

The Smoothwall Filter system filters all internet feeds, across all devices and operating systems, preventing access to any web content that is on the blocked list.

Smothwall Filter identifies the device/IP address (and where possible the individual), time and date of attempted access and search term or content being blocked. Smoothwall Filter is able to have different policies in place for each school, to ensure the provision meets the needs of individual schools, pupils and staff.

All BDAT schools also have keystroke monitoring in place through software called Smoothwall Monitor who are also members of the Internet Watch Foundation. Smoothwall Monitor is a real-time digital monitoring solution that flags up safeguarding concerns when users view or type harmful content. This also captures activity outside of web browsers e.g. when a pupil might be typing a document.

It is the responsibility of the DSL in each of our schools to respond to any alerts from either Smoothwall Filter or Smoothwall Monitor and ensure that appropriate actions have been taken to safeguard the pupils involved. Records should be maintained on CPOMS in line with safeguarding procedures.

To maintain the effectiveness of our filtering and monitoring systems, we are committed to conducting at least annual reviews across the Trust. These reviews allow us to assess the performance and suitability of our current provision in each of our schools and make necessary adjustments to ensure the continued protection of our pupils.

10.21 Additional Advice and Support

KCSIE 2025 Annex B contains a wealth of signposting information to sources of support, advice and guidance for school staff and parents. The safeguarding team in each BDAT school are also able to support parents and families with signposting to a wide variety of support through external agencies.

11 Taking Action to Ensure that Children are Safe at School and at Home

All staff throughout BDAT are responsible for reporting any safeguarding concerns they have to the DSL and Safeguarding Team within their school through CPOMS.

It is ***not*** the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All members of staff, however, have a duty to recognise concerns and maintain an open mind. Any child, in any family, in any school, could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".

11.1 Reporting a Concern

Where a member of staff recognises signs or indicators that a child may have unmet needs or welfare concerns these must always be passed on to the DSL immediately via CPOMS to ensure that any appropriate interventions and/or referrals can be actioned. These signs or indicators may be of one of the main four types of abuse or neglect or may relate to other specific safeguarding issues.

Examples of concerns that staff must immediately report are:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play;
- any explanation given which appears inconsistent or suspicious;
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g. worrying drawings or play);

- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment;
- any concerns that a child is presenting signs or symptoms of abuse or neglect;
- any significant changes in a child's presentation, including non-attendance;
- any hint or disclosure of abuse from any person;
- any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present);
- any potential indicators of Child Exploitation (CE);
- any potential indicators of FGM;
- any potential indicators of Radicalisation;
- any potential indicators of living in a household with Domestic Abuse;
- any children who they believe may benefit from early help.

The DSL will use the Bradford Continuum of Need to determine the threshold of concern and then will determine whether this can be dealt with within school or whether this may require an Early Help Assessment or a referral into Bradford Children's Social Care via the Integrated Front Door referral pathway.

11.2 Responding to Disclosure

Disclosures or information may be received from pupils, parents or other members of the public. BDAT recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff throughout BDAT will handle disclosures with sensitivity.

Such information cannot remain confidential, and staff will immediately communicate what they have been told to the DSL and make a contemporaneous record on CPOMS.

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the DSL in their school in order that they can make an informed decision of what to do next.

The DSL will ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. All possible efforts should be undertaken to obtain the child's voice, regardless of any communication needs the child may have. The SENDCO may provide additional support or advice to the DSL where there are communication barriers arising from special educational needs.

Child protection processes will always operate with the best interests of the child at their core.

All staff will:

- listen to and take seriously any disclosure or information that a child may be at risk of harm;
- try to ensure that the person disclosing does not have to speak to another member of school staff;
- clarify the information;
- try to keep questions to a minimum and of an 'open' nature e.g. using TED technique – 'Tell me, Explain to me, Describe to me….';
- try not to show signs of shock, horror or surprise;
- not express feelings or judgements regarding any person alleged to have harmed the child;

- explain sensitively to the person that they have a responsibility to refer the information to the Designated Safeguarding Lead. Children need to know that staff may not be able to uphold confidentiality where they are concerns about their safety or someone else's;
- reassure and support the child as far as possible;
- explain that only those who 'need to know' will be told whilst not promising blanket confidentiality;
- explain what will happen next and who will be involved as appropriate;
- record details including what the child has said in the child's words via CPOMS and record any visible signs, injuries or bruises on a Body Map. They should never take photos of any injuries;
- record the context and content of their involvement distinguishing between fact, opinion and hearsay;
- seek support themselves if they feel distressed as a result of the disclosure.

11.3 Action by the Designated Safeguarding Lead (or Deputy)

Following any information raising a concern, the Designated Safeguarding Lead (DSL) will consider:

- any urgent medical needs of the child;
- whether the child is subject to a Child Protection Plan;
- discussing the matter with other agencies involved with the family;
- consulting with appropriate professionals known to the child e.g. Early Help, Children's Social Care or a medical professional working with the child;
- the child's wishes.

Then DSL will then consider the following options:

- to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk;
- whether to make a child protection referral to the Children's Social Care via the Integrated Front Door referral pathway because a child is suffering or is likely to suffer significant harm;
- not to make a referral at this stage and manage the support for the child internally using the school's own pastoral support processes;
- if further monitoring is necessary;
- if it would be appropriate to undertake an assessment (e.g. Early Help) and/or make a referral to other services (e.g. CAMHS).

All information and actions taken, including the reasons for any decisions made, will be fully documented on CPOMS and the process depicted in the flowchart in **Appendix Three** will be followed.

If the DSL is of the view that concerns are not being responded to appropriately then these concerns will be escalated until the DSL feels that some resolution has been achieved. Initial escalation would be to the appropriate Children's Social Care Team Manager, however, may also involve escalation to the appropriate Service Manager or Head of Service if it is felt necessary to do so. The Bradford District Safeguarding Children's Partnership - Resolving Professional Disagreements flowchart provides further information.

11.4 Reporting Directly to Child Protection Agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with Children's Social Care, Police or the NSPCC if:

- the situation is an emergency and the DSL, their deputy, the Headteacher and the Trust Head of Safeguarding are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety
- for any other reason, they make a judgement that direct referral is in the best interests of the child.

11.5 Action Following a Child Protection Referral

The Designated Safeguarding Lead or other appropriate member of staff will:

- make regular contact with the social worker involved to stay informed;
- wherever possible, contribute to the strategy discussion and initial assessment;
- provide a report for, attend and contribute to any subsequent child protection conference;
- if the child or children are made the subject of a child protection plan, contribute to the child protection plan and attend core group meetings and review conferences;
- where possible, share all reports with parents prior to meetings;
- where in disagreement with a decision made by Children's Social Care e.g. not to apply child protection procedures or not to convene a child protection conference, follow the guidance in the Bradford District Safeguarding Children's Partnership - Resolving Professional Disagreements
- where a child subject to a child protection plan moves from the school or goes missing, school will immediately inform their allocated social worker.

11.6 Early Help

An Early Help Assessment coordinated by a Lead Professional enables professionals to ensure that children, young people and families get the help they need.

An Early Help Assessment will enable the needs of the child or young person and their family to be identified and the best services to be co-ordinated to meet their needs. The Lead Professional will organise a Team Around the Family meeting with the parent(s), children (where appropriate) and relevant services to co-ordinate the Early Help Plan.

Effective Early Help relies upon local agencies working together and using the Early Help Assessment to:

- Identify children and young people and their families who would benefit from early help;
- Undertake an assessment of the need for early help; and
- Provide additional, targeted or enhanced early help services to address the assessed needs of a child and their family which focus on activity to significantly improve the outcomes for the child.

Before determining what services are to be provided for a particular child or young person, so far as is reasonably practicable and consistent with the child's welfare, professionals will consider the child

or young person's perception of their circumstances and what they want to change, and any ideas they have about what will help.

Where parents or a young person do not consent to Early Help or do not use the services offered, then the Lead Professional should make a judgement as to whether, without significant help, the needs of the child will escalate. If so, a referral into Children's Social Care via the Integrated Front Door referral pathway may be necessary.

Where a child or young person or their family has very complex needs or the Early Help Plan has not resulted in the desired improvement outcomes for the child or young person, an assessment by a Children's Social Care may be appropriate.

Lead Professionals can be from external agencies but may also be DSLs or school staff. Early Help Co-Ordinators are available to support Lead Professionals with all aspects of the Early Help Process. For more information and guidance please see the Safer Bradford website.

11.7 Recording and Monitoring

Throughout BDAT, accurate records of concerns, discussions and decisions will be made on CPOMS as soon as practicable and will clearly distinguish between observation, fact, opinion and hypothesis.

All records will state who is providing the information, their job role, the date and time, information will be recorded in the child's words where possible, and a note made of the location of any injuries seen via the Body Map function.

The DSL in each school will ensure that there is an appropriate method for members of staff or volunteers without CPOMS access to pass on safeguarding concerns or information (e.g. via a paper Cause for Concern Form).

Safeguarding records will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached including the rationale behind them and the outcome.

All documents will be securely retained in an electronic 'Child Protection File', separate from the child's school file, on CPOMS. This will be configured to ensure that appropriate levels of access are in place for all staff. Any paper copies will be locked away and accessible only to the Headteacher and DSL.

The creation, retention and maintenance of all child protection files will meet the requirements of the Data Protection Act 2018 (which includes the General Data Protection Regulations 2018).

11.8 Transfer of Child Protection Files

It is the responsibility of all BDAT schools to maintain the original child protection file whilst the child is a pupil with them.

When a child leaves a school, their original child protection file must be transferred to their new school as soon as possible, and certainly within 5 days for an in-year transfer or within the first 5 days of the start of a new term.

This original file will be transferred separately from the main pupil file. This is usually undertaken between Designated Safeguarding Leads at both schools and may be undertaken electronically.

In circumstances where a child is moving to a school where electronic file transfer is not possible, child protection files should be clearly marked as confidential, for the attention of the DSL only and transferred by recorded delivery so that they can be signed for. A receipt should be obtained which states when the file was transferred and who delivered and received the file.

A transferring school does not need to keep copies of child protection files, however, may have good reason to do so, such as a copy of the child's chronology and any documents that the school created e.g. risk assessments and documents in relation to involvement with ongoing proceedings, in an archive file. Any such files must be kept in accordance with the BDAT GDPR Policy and associated date retention rules.

The receipt of the transferred file should be kept alongside this archive. Any archived files are stored securely in the same way as an active file.

It is the responsibility of the final school a child attends to maintain the original child protection file until the child reaches the age of 25 years old.

If the child goes missing from education or is removed from roll to be electively educated at home, any child protection file will be transferred and sent to the local authority Education Safeguarding Team.

12 Confidentiality and Sharing Information

Throughout BDAT, all staff will understand that safeguarding and child protection issues warrant a high level of confidentiality, not only out of respect for the pupil involved, but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss safeguarding concerns with the DSL (or Deputy in their absence). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

It is important to note, however, that KCSIE emphasises that any member of staff can contact Children's Social Care if they are concerned about a child.

Child protection information will be stored and handled in line with the UK GDPR and Data Protection Act 2018. Information sharing is guided by the following principle - information is:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure

Information sharing decisions will be recorded, whether or not the decision is taken to share. Child protection information will be stored within CPOMS, separately from the pupil's file.

The DSL will normally obtain consent from the pupil and/or their parents to share sensitive information within school or with outside agencies. Where there is good reason to do so, the DSL may share information without consent and will record the reason for not obtaining consent (e.g. where they feel that to gain consent may put the child at an increased risk of harm).

If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to their Headteacher and school Data Protection Officer to consider in line with the BDAT GDPR Policy.

KCSIE 2025 P.55 states that, '***DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare***. *If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information* ***must not*** *be allowed to stand in the way of the need to safeguard and promote the welfare of children*.'

13 Links to Other Guidance and Policies

This policy should be read in conjunction with the following guidance and other BDAT/Academy specific policies:

- DFE Guidance on Keeping Children Safe in Education
- Preventing Youth Violence and Gang Involvement
- Criminal Exploitation of Children and Vulnerable Adults: County Lines
- Relationships Education, Relationships and Sex Education and Health Education
- Teaching Online Safety in Schools
- Sharing Nudes and Semi-Nudes Advice for Education Settings
- Guidance for Safer Working Practice in Education Settings
- Children Missing Education Statutory Guidance
- DFE Digital and Technology Standards
- DFE Guidance on Working Together to Improve School Attendance
- Alternative Provision Statutory Guidance
- Behaviour in Schools Guidance
- Keeping Children Safe in Out-of-School Settings: Code of Practice
- Searching, Screening and Confiscation Guidance
- Positive Environments Where Children Can Flourish
- NPCC Guidance for Schools on When to Call the Police

- BDAT Equality Statement and Objectives
- BDAT GDPR Policy
- BDAT Recruitment and Selection Toolkit
- BDAT Health and Safety Policy
- BDAT Managing Allegations and Low Level Concerns Policy
- BDAT Whistleblowing Policy
- BDAT Attendance Statement

- BDAT Behaviour Statement
- BDAT Anti-Bullying Policy
- BDAT Prevent Policy

- Immanuel specific police that are accessible on our website:
    - Attendance policy
    - Behaviour policy
    - E-safety policy
    - Anti-bullying policy

Appendix One: Contextual Safeguarding Information at Immanuel College

Immanuel College recognises that safeguarding incidents and/or behaviours can be associated with factors outside of school and/or can occur between children outside the school. This extra-familial harm can take a variety of different forms which can include sexual exploitation, criminal exploitation and serious youth violence.

All staff, but especially the Designated Safeguarding Lead and their safeguarding team will consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. We will provide as much information as possible to children's social care (and if appropriate, the police) as part of any referral undertaken.

The below table indicates some of the contextual safeguarding factors that we recognise may affect our students, along with our safeguarding response.

Geographical Factors	Our Response
Some of our students live close to a busy railway line. Some of our students live close to the canal and river. Immanuel students live in an area with good transport links into Bradford, Leeds, towns in North Yorkshire as well as the M62 corridor. This means that our students could possibly be vulnerable to exploitation	Our PSHE curriculum uses information from the Transport Police regarding safety around tracks. Students are taught about keeping safe in PSHE. Other appropriate information is on our website under the Safeguarding page. Students are taught about exploitation through the PSHE curriculum, so they know how to keep themselves safe. The Designated Safeguarding Lead has undertaken specific training around child exploitation.
Social and Economic Factors	**Our Response**
Students are known to socialise in Bradford town centre as well as their more local communities. The cost-of-living crisis means that some families may be vulnerable to financial hardship	Students are taught about personal safety through the PSHE and assembly curriculum, so they know how to keep themselves safe when out and make positive decisions about their conduct outside of school. Our Christian values are taught through the Form Time curriculum so students know how to act with dignity and understand the impact of antisocial behaviour. If we are made aware that students are involved in any risk taking or antisocial behaviour, the school works closely with our Safer Schools Police Officer in order to assess and mitigate the risk. It is a school priority to continue building our communication and relationships with parents

which could lead to students living in poverty. Over 25% of our students reside in the area identified as the highest deprivation decile (indices of Deprivation Affecting Children Index) based on their postcode.	and families. We work with families to support as far as we reasonably can in ensuring that students are able to access their education and have a healthy meal whilst they are at school. There are also a range of services to whom we signpost or refer families who may need extra support.
Home or Cultural Factors	Our Response
The cost-of-living crisis means that some parents are likely to be under significant additional stress and pressure. This could lead to mental health issues and possible domestic abuse, which can then impact upon children. The most recorded crime in our postcode by far is Violence and Sexual Offences. The majority of students are connected to the internet and regularly use their devices to engage in online gaming and social media activity. This could make them vulnerable to online safety issues such as exposure to harmful material or exploitation.	It is a school priority to continue building our communication and relationships with parents and families. There are a range of services to whom we signpost or refer families who may need extra support when circumstances are difficult. We continue to monitor and respond appropriately to all notifications of Domestic or Sexual abuse. All students are taught about online safety through the PSHE, Form Time and assembly curriculum. Any new information regarding online threats are sent out to parents and also relevant guidance for safe internet usage is on our website. As a school we maintain a strict no phones policy whilst the students are in school in order to minimise possible cyber-bullying in school but we also respond proactively to any reports about issues happening outside of school hours via our Student Liaison Officers and Safer Schools Police Officer. We also work with local 3rd sector organisation to run awareness assemblies on topics such a 'sextortion' and 'child exploitation'.

Appendix Two: Useful Contacts at Bradford Local Authority

Children's Social Care
Integrated Front Door: 01274 433999 (Monday to Friday – 8.30 to 17.00)
Emergency Duty Team: 01274 431010 (all other times)

Website: https://www.bradfordcft.org.uk/

West Yorkshire Police
Emergency Telephone: 999
Non-Emergency Telephone: 101
Website: www.westyorkshire.police.uk/report-it

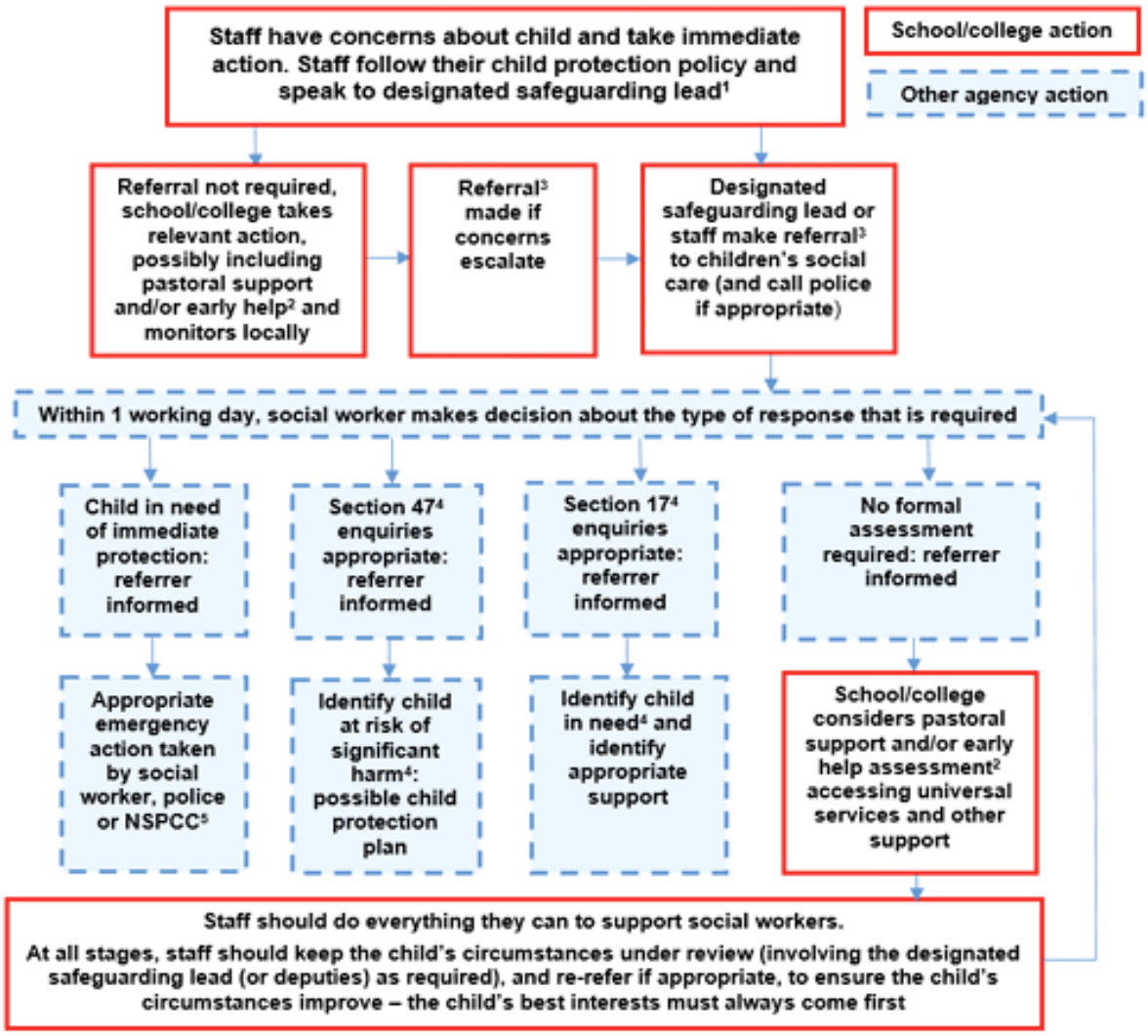
Other Useful Contacts

Team	Email	Telephone
Access Team	Education.Access@bradford.gov.uk	01274 439393
Attendance Support Team	Attendance@bradford.gov.uk	01274 435743
CE Hub	Child.Exploitation@bradford.gov.uk	01274 435080
Child Employment/Entertainment	cee@bradford.gov.uk	01274 437607
Children Missing Education	CME@bradford.gov.uk	01274 438877
Council Main Switchboard		01274 431000
Customer Contact Centre	childrens.enquiries@bradford.gov.uk	01274 432111
Early Years	earlyeducationfund@bradford.gov.uk	01274 437503
Educational Psychology Team	EducationalPsychologyTeam@bradford.gov.uk	01274 439444
Elective Home Education	electiveheducation@bradford.gov.uk	01274 439340
Holidays in Term Time Fines	PN@bradford.gov.uk	01274 439651
Housing	housingoptions@bradford.gov.uk	01274 435999
LADO	LADO@Bradford.gov.uk	01274 435600
Missing team	Childrens.enquiries@bradford.gov.uk	01274 439999
NSPCC Whistleblowing Helpline		0800 0280285
Prevent Coordinator	Danielle.King@bradford.gov.uk	07788264621
Prevent Education Officer	rachel.lee@bradford.gov.uk	07484923127
Prosecution/Penalty Notice	Attlegal@bradford.gov.uk	01274 439651
Safeguarding Complaints, Compliance & Advice	EdSafeTeam@bradford.gov.uk	01274 437043
School Admissions Team	schooladmissions@bradford.gov.uk	01274 439200
Social Communication Interaction & Learning Team (SCIL)	SCILTeam@bradford.gov.uk	01274 439500
Special Educational Needs & Disability Team (SEND)	SEN@bradford.gov.uk	01274 435750
Virtual School for Children Looked After	Jonathan.cooper@bradford.gov.uk	01274 436401

Appendix Three: KCSIE Flowchart of Actions where there are Concerns about a Child

A flowchart setting out the actions taken where there are concerns about a child

Figure 1



[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

[2] Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the early help process.

[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. See Working Together to Safeguard Children.

[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Working Together to Safeguard Children.

[5] This could include applying for an Emergency Protection Order (EPO).

Appendix Four: Bradford Local Authority Child Protection Procedures Flow Chart

On discovery or suspicion of child abuse - ACT
If in doubt - ACT

Inform your Designated Safeguarding Lead (DSL) for Child Protection

Designated Safeguarding Lead

If the DSL cannot be located, then please contact one of the following:

Deputy DSL	**Deputy DSL**	**Deputy DSL**

In the event the identified people are not available and there is a safeguarding concern, please refer to Children's Initial Contact Point on 01274 433999

On receipt of the information the DSL should take the following steps:

Where it is clear that a Child Protection Referral is needed, contact Children's Initial Contact Point without delay **Tel: 01274 433999**

Out of hours Emergency Duty Team **Tel: 01274 431010**

Where the DSL is not sure whether it is a child protection issue, they may seek advice from the Education Safeguarding Team **Tel: 01274 437043**

If you are asked to monitor the situation, make sure you are clear what you are expected to monitor, for how long, and how and to whom you should feedback information.

Remember to always make and keep a written record of all events and actions taken, date and sign each entry to this record.
Keep records confidential and secure and separate from the child's curriculum file.

Always demonstrate professional curiosity by following up with the DSL whether action has been taken and where appropriate how it has been resolved.

Staff should not assume a colleague, or another professional, will take action and share information that might be critical in keeping children safe.

Always remember, safeguarding is everyone's responsibility.

Appendix Five: Flowchart of Initial Actions when Responding to an Incident of Child on Child Abuse

School initial action flow chart

Disclosure is made

The victim should be reassured. Confidentiality must not be promised. The allegation must be immediately reported to the DSL (or deputy) and a record started.

Victim(s)

Immediate provision must be made for their physical and emotional safety. This may include being removed from lessons and offered a safe space in school. They should then be given the opportunity to write a statement (or to explain their allegation to a trusted adult of their choosing who will keep a record). This may need to take place later in the presence of a family member.

Alleged perpetrator(s)

The DSL will make an immediate risk assessment and take action to ensure the safety of the victim, perpetrator, other students, and staff. The Brook Traffic Light Tool appropriate to the age or stage of the alleged perpetrator should be referred to when assessing risk and need. This may include the immediate isolation of the alleged perpetrator(s).

Staff receiving disclosure

Staff must be given the time and space to write their account of the disclosure as soon as it is practicable. They must be advised to write in detail and to indicate where they have used the student's words verbatim. This should be recorded.

Decision to involve other agencies

The DSL (or deputy) will collate all documents and create a record of all interactions and investigations. The DSL (or deputy) will discuss the allegations with the Headteacher or other suitably qualified member of SLT. A decision will be made as to whether the allegation can properly be managed internally or whether other agencies should be involved.

Further information can be found in Part 5 of KCSIE 2025

Victim(s)

Arrangements will be made for families to be notified of the allegation. Safety and support advice will be given to families and a member of SLT will be assigned as their main contact. A record will be kept on CPOMS.

Alleged perpetrator(s)

Arrangements will be made for families to be notified of the allegation. Safety and support advice will be given to families and a member of SLT will be assigned as their main contact. A record will be kept on CPOMS.

Staff receiving disclosure

Arrangements will be made for families to be notified of the allegation. Safety and support advice will be given to families and a member of SLT will be assigned as their main contact. A record will be kept CPOMS.

Next steps

The DSL will lead on planning, to include:

- Appropriate support for the victim(s) and staff and appropriate support and sanctions for the perpetrator(s).
- Ongoing risk assessment and control measures.
- Investigation of the allegation and decisions on next steps.

Appendix Six: Table of Substantive Changes to Keeping Children Safe in Education 2025

The below tables explain where substantive changes have been made to KCSIE 2025:

Part One: Safeguarding Information for All Staff	
Summary	**About the Changes**
No changes made	

Part Two: The Management of Safeguarding	
Summary	**About the Changes**
Paragraph 128	Added a note to say that revised guidance on Relationships, Sex, and Health Education is expected in Summer 2025. This will be signposted to in the final version if it is published.
Paragraph 135	Updated to clarify that misinformation, disinformation and conspiracy theories are safeguarding harms.
Paragraph 142	Link added to the plan technology for your school service, which schools can use to assess themselves against the filtering and monitoring standards and receive personalised recommendations on how to meet them.
Paragraph 143	Link added to DfE guidance on the use of generative AI in education (2025) at end of filtering and monitoring section to support schools and colleges.
Paragraph 144	Wording amended in the cybersecurity standards for schools and colleges advice to clarify that it was developed to help schools improve their cyber resilience.
Paragraph 169-170	Information added that clarifies and reflects existing AP Guidance.
Paragraph 177	Updated to clarify 'working together to safeguard attendance' 'is now 'statutory' guidance.
Paragraph 199	Amended to clarify that the role of the virtual head has been extended to include responsibility for promoting the educational achievement of children in kinship care.
Paragraph 204	Added a note to say that revised guidance on Gender Questioning Children is expected in Summer 2025. This will be signposted to in the final version if it is published.
Paragraph 205	Removal of 'spectrum' and 'disorder' terminology to align with SEND code of practice.

Part Three: Safer Recruitment	
Summary	**About the Changes**
Paragraph 260	Reference to TRA's Employer Access Service removed and replaced with new link to GOV.UK page.
Paragraph 266	Reference to TRA's Employer Access Service removed and replaced with new link to GOV.UK page.
Paragraph 319	Reference to TRA's Employer Access Service removed and replaced with new link to GOV.UK page.
Paragraph 331	Information added that clarifies and reflects existing AP Guidance.

Part Four: Safeguarding Concerns or Allegations Made About Staff, including Supply Teachers, Volunteers and Contractors	
Summary	**About the Changes**
Paragraph 422	Amended to correct the title of the Information Commissioner's employment practice guidance.

Part Five: Child-on-Child Sexual Violence and Sexual Harassment	
Summary	**About the Changes**

Paragraph 545	Link added to the Lucy Faithfull Foundation's 'Shore Space', which offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours.

Annex B	
Summary	**About the Changes**
Page 157	Header removed
Page 163	Link added to the CSA Centre's Resources for education settings | CSA Centre.
Page 164	Link added to the Preventing Child Sexual Exploitation | The Children's Society.

Appendix Seven: Summary of Policy Changes

The below table provides a summary of changes to this policy over time:

September 2024	
Page	**Summary of Change**
Throughout	Updated all references to KCSIE 2023 to KCSIE 2024
3	Updated hyperlinks to ensure that they link to latest versions of guidance/legislation
6	• Moved details of the safeguarding team from an appendix into the main body of the policy so that it is more accessible for parents and stakeholders.
8	• Changed frequency of Head of Safeguarding's reports to Trust Board from 'termly' to 'biannually' to reflect practice. • Added in making a referral to the Teaching Regulation Agency (where necessary) to the Headteacher's responsibilities to reflect that this may be a requirement in cases of staff misconduct
9	• Changed frequency of DSL's reports to LGBs from 'half-termly' to 'regularly' to reflect that practice can vary in schools depending on their LGB arrangements. • Updated hyperlink to KCSIE 2024 Annex C
12	Updated the Appendix number for the Contextual Safeguarding appendix. Added in text to reflect that schools have a more localised version of this appendix within their own versions of this policy.
13	Replaced hyperlink to Information Sharing Guidance with latest version
16	• Added in that the BDAT Head of Safeguarding completes annual safeguarding quality assurance checks at all alternative providers used by BDAT schools • Added in a link to the BDAT Alternative Provision Statement
20	• Added in 'gender identity' to the reasons why a pupil may be more vulnerable to discrimination or maltreatment • Added in 'in receipt of multiple suspensions or at risk of permanent exclusion' as a reason why a pupil may be more vulnerable • Added in 'exploitation' when referring to types of abuse in line with updated terminology in KCSIE 2024
21	Updated to include the latest definition of 'Extremism' in line with latest Prevent guidance
22	Added in link to the BDAT Prevent Policy
27	Updated link to KCSIE 2024 Part 5
30	• Updated link to KCSIE 2024 Part 5 • Changed 'poor attendance' to 'persistent or unexplainable absences' in reference to potential indicator of a safeguarding concern in line with new KCSIE • Updated link to latest version of DFE Guidance on Working Together to Improve School Attendance • Added in link to new School Attendance (Pupil Registration) Regulations
32	Updated the Appendix number for the Contextual Safeguarding appendix. Added in text to reflect that schools have a more localised version of this appendix within their own versions of this policy.
34	Updated link to KCSIE 2024 Annex B
38	Added 'including the rationale behind them' to reflect that DSLs should make records of the reasoning behind their decision-making

40	Updated the paragraph number of KCSIE related to fears about information sharing
43	Updated list of useful contacts at Bradford Local Authority
46	Added in Bradford Local Authority's Child Protection Procedures flow chart
48	Replaced table of substantive changes to KCSIE 2023 with table of substantive changes to KCSIE 2024
49	Added in summary of policy changes
September 2025	
Page	**Summary of Change**
Throughout	Checked all hyperlinks are working and updated to the newest versions of any guidance (e.g. changing KCSIE 2024 to KCSIE 2025).
6	Reviewed school level safeguarding team to ensure that it is accurate for the new academic year
7	Updated frequency of safeguarding reports to the Trust Board to biannual rather than termly
12	Added in a paragraph noting that some children may have needs that impact on their ability to communicate and that staff will explore all options to hear the voices of children, whether it be verbally or non-verbally.
16	Strengthened the section on alternative provision in line with the changes to KCSIE 2025, including that all placements will be kept under regular review to ensure they are safe and meeting the needs of the pupils attending.
20	Added in a paragraph to note that any child can experience vulnerability at different times in their life and it is not binary as to whether a child is or isn't vulnerable. Highlighted that schools will be vigilant in recognising and responding to such circumstances as early as possible.
22	Updated contact details for the Bradford Prevent Education Officer
23	Added in artificial intelligence as a risk relating to online radicalisation
24	Added in paragraph on financial exploitation as a specific form of child exploitation
27	Added in that consensual and non-consensual sharing of nude and semi-nude images could include fake images or videos that are generated by artificial intelligence.
34	Added in specific reference to generative artificial intelligence as a concern that can exacerbate online safety risks. In the 'Content' section of online safety, added in misinformation, disinformation (including fake news) and conspiracy theories in line with the updates to KCSIE 2025.
34-35	Changed all references to Securely to Smoothwall Filter due to change in filtering provider across BDAT
36	Strengthened the paragraph on obtaining the child's voice to make clear that all possible efforts should be undertaken to gather it, regardless of any communication needs the child may have.
37	Added in hyperlink to the Bradford District Safeguarding Children's Partnership Professional Disagreements procedure.
39	Added in that staff will record their job role as part of CPOMS records so that the records have greater context