



Abbey Gate College

POLICY: Safeguarding	
Scope	Whole College
Responsibility	DSL
Reviewed & Updated	September 2026
Governor Approval	Vanessa Brodie
Board Level Approval	Gareth Lee

CONTENT HYPERLINKS

[Policy Statement \(1\)](#)

[Policy Statement \(2\)](#)

[Key Personnel](#)

[Statement of Intent](#)

[Definitions \(1\) – Types & Signs of Abuse](#)

[Definitions \(2\) – Specific Safeguarding Issues](#)

[Practice \(1\) – Dealing with Concerns about a Child](#)

[Practice \(2\) – Child-on Child Abuse](#)

[Practice \(3\) – Online Safety](#)

[Practice \(4\) – Making and Sharing of Nude/Semi-Nude Images](#)

[Practice \(5\) – Child on Child Sexual Violence and Sexual Harassment](#)

[Practice \(6\) – Modern Slavery](#)

[Practice \(7\) – Serious Violence](#)

[Practice \(8\) – Radicalisation and Prevent Duty](#)

[Practice \(9\) – Female Genital Mutilation \(FGM\)](#)

[Practice \(10\) – Forced Marriage](#)

[Practice \(11\) – Children who are absent from Education](#)

[Practice \(12\) – Child Sexual Exploitation \(CSE\) & Child Criminal Exploitation \(CCE\)](#)

[Practice \(13\) – Children Potentially at Greater Risk of Harm](#)

[Practice \(14\) – Mental Health](#)

[Practice \(15\) – Looked after children and previously looked after children](#)

[Practice \(16\) – Children who are Gender Questioning](#)

[Practice \(17\) – Operation Encompass](#)

[Practice \(18\) – Safeguarding Children: Key Points](#)

[Practice \(19\) – Flowchart of Actions to be taken when there are Concerns about a Child](#)

[Practice \(20\) – Flowchart of Actions to be taken where there is a Concern about a Pupil being Vulnerable to Terrorism](#)

[Practice \(21\) – Safer Recruitment](#)

[Practice \(22\) – Allegations of Abuse against Teachers & other Staff \(including the Head, Governors, and Volunteers\)](#)

[Practice \(23\) – Reporting Concerns about Safeguarding Practices in College](#)

[Practice \(24\) – Response to COVID-19 or other pandemic](#)

[Practice \(25\) - Visitors](#)

[Practice \(26\) – Volunteers](#)

[Practice \(27\) – Visiting Speakers](#)

[Practice \(28\) - Use of school or college premises for non-school/college activities](#)

[Practice \(29\) – Disqualification from Working in Childcare](#)

[Practice \(30\) – Mobile Phones/Devices and Cameras](#)

[Roles & Responsibilities \(1\) – Governor, DSL, DDSL](#)

[Roles & Responsibilities \(2\) – Data Management, Alternative Providers, Fostering & Hosting](#)

[Roles & Responsibilities \(3\) – Training](#)

[APPENDIX 1 – Key Safeguarding Contact Information](#)

[APPENDIX 2 – Safeguarding Children Partnership Contact Information](#)

[APPENDIX 3 – Contact Information For National Organisations](#)

[APPENDIX 4 – Useful Websites](#)

[APPENDIX 5 – Leadership & Management Safeguarding Training](#)

[APPENDIX 6 – Flowchart Of When and How to Share Information](#)

[APPENDIX 7 – Risk Assessment Form for Volunteers](#)

[APPENDIX 8 - Mental Health Risk Assessment Tool](#)

[APPENDIX 9 - Policy for Safeguarding Against AI Deepfake Misuse of School Website Images](#)

[APPENDIX 10 – UK Online Harms Early Warning Working Group - Protecting your setting's images from AI manipulation and abuse](#)

Policy Statement (1)

The purpose of our whole College Safeguarding Policy and procedures is to promote the welfare of children and protect them from harm. All staff (full-time/part-time/peripatetic staff/volunteers and governors) are fully committed to the safeguarding of children and receive regular update training in safeguarding to confirm their understanding of the policy and their respective responsibilities.

- 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 in line with the outcomes set out in the Children's Social Care National Framework.

'Safeguarding' is an umbrella term encompassing the whole safety and well-being of a child (defined as being under 18 years of age) and recognises the importance of the preventative agenda and early intervention. Child protection is a part of safeguarding and promoting welfare.

This policy has regard to the following guidance and advice, and full details about each of these publications is available on the publications section of www.gov.uk

- **Keeping Children Safe in Education September 2026**
 - **Disqualification under the Childcare Act 2006** (June 2006 -Updated August September 2018)
 - **What to do if you're worried a child is being abused: advice for practitioners** (March 2015)
 - **National Police Chiefs' Council – 'When to call the police'.**
 - **Working Together to Improve School Attendance** (August 2024)
 - **Working Together to Safeguard Children** (March 2026)
 - **Information sharing:** (2018)
 - **Relationships, Sex and Health Education (RSE) and Health Education** (September 2026)
 - **Prevent Duty Guidance: Guidance for specified authorities in England and Wales** (December 2023)
 - **The Prevent duty: practical guidance for designated safeguarding leads**
 - **EYFS framework September 2026**
 - **Coronavirus (COVID-19): safeguarding in schools, colleges and other providers** (published 27 March 2020 – withdrawn 31 July 2020).
 - **Safeguarding and remote education during coronavirus (COVID-19).**
 - **Preventing and Tackling Bullying** (August 2013 - Updated July 2017)
 - **Mental Health and Behaviour in Schools** June 2014 - Updated November 2018

- **Behaviour in Schools** February 2024
- **Public Health England guidance: Promoting children and young people's emotional health and wellbeing.**
- **Equality Act 2010**
- **Human Rights Act (HRA) 1998**
- **The Data (Use and Access) Act 2025**

This policy also takes into account the procedures and practice of Cheshire West and Chester Local Authority – Cheshire West and Chester Safeguarding Children Partnership in line with Working Together 2026. We recognise the importance of our role in contributing to multi-agency working and will be fully engaged, involved and included with other agencies in the interests of our pupils in line with 'Working Together – 2026' while at all times having the best interests of the child as a focus.

Policy Statement (2)

- 1) This policy applies to all members of the Abbey Gate College community, including those in our EYFS setting.
- 2) Abbey Gate College implements this policy through adherence to the procedures set out in the rest of this document.
- 3) This policy is made available to all interested parties on the College website at www.abbeygatecollege.co.uk. It should be read in conjunction with the College's *Anti-Bullying, Behaviour, Attendance, Missing Child, Use of Reasonable Force, including Restrictive Interventions, RSE, PSHE, SEND, and Whistleblowing* policies.
- 4) Abbey Gate College is fully committed to ensuring that the application of this policy is non-discriminatory in line with the UK Equality Act (2010). Further details are available in the College's *EDI* policy document.
- 5) This policy is reviewed at least annually, or as events or legislation changes require, by the College Leadership Team and the Governing Body. The deadline for the next review is no later than 12 months after the most recent review date indicated above.
- 6) The most recent updates were made to reflect Keeping Children Safe in Education 2026, revised Relationships, Sex and Health Education statutory guidance (September 2026), developments in Family Help arrangements, Violence Against Women and Girls (VAWG) guidance, Operation Encompass requirements, updated online safety risks, volunteer DBS requirements and revised safeguarding expectations. [\[Keeping_ch...tion_2026_ | PDF\]](#)

Key Personnel

- 1) Carole Houghton: Deputy Head (Pastoral) & DSL (Designated Safeguarding Lead)
- 2) Corinna Travis: Deputy DSL & Head of Infant and Junior School
- 3) Craig Jenkinson: Head (Whole College)
- 4) Patricia (Trish) Sheckley: Counsellor & Lead First-Aider
- 5) Lucy Hornby: Senior School LE Co-ordinator
- 6) Gareth Lee: Chair of Governors

7) Vanessa Brodie: Safeguarding Governor

Statement of Intent

Safeguarding and promoting the welfare of children is everyone's responsibility and all staff at Abbey Gate College are aware of their duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Appropriate policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

No single professional can have a full picture of a child's needs and circumstance. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action. This policy gives guidance about actions to be taken by staff who have concerns about a child and the role of the DSL (Designated Safeguarding Lead) and DDSL (Deputy Designated Safeguarding Lead).

All staff are aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role that they might be expected to play in such assessments.

Children are made aware that if they are worried, they can approach any member of staff at College, at any time. Specific staff are highlighted to pupils to ensure that they are aware that they will be listened to and early help will be provided. We are committed to provide opportunities throughout the whole College, within our PSHE and RSE curriculum and related curriculum, to enable pupils to understand what abuse is and how best to keep themselves safe; including when they are online. Additionally, anonymous reporting is available to all Senior School pupils through the 'Whisper' platform, promoted around school.

Definitions (1) – Types & Signs of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include treatment that is not physical as well as the impact of witnessing the ill-treatment of others. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place face-to-face and/or wholly online. Staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside of College and from other contexts. Children can be abused by an adult or adults or by another child or children ie child on child.

Abuse can be:

- Physical
- Emotional
- Sexual
- Neglect.

All College staff are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff, but especially the designated safeguarding lead (and deputies) consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, the sharing of abusive images and pornography to those who do not want to receive such content and the creation of AI deepfake imagery. Additionally, online misinformation, disinformation and conspiracy theories are safeguarding harms.

In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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.

Definitions (2) – Specific Safeguarding Issues

Behaviours linked to drug taking, alcohol abuse, deliberately missing education, serious violence, radicalisation and taking and/or sharing of nude/semi-nude images put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying, prejudice-based and discriminatory bullying), abuse in intimate personal relationships between children, physical abuse, sexual harassment and violence, engagement in sexual activity without consent, sexting, upskirting and initiation/hazing type violence.

Safeguarding issues can also be linked to, for example,

- children missing education;
- child sexual exploitation;
- domestic violence;
- fabricated or induced illness;
- faith abuse;
- female genital mutilation
- forced marriage;
- gangs and youth violence;

- gender based violence/violence against women and girls;
- hate and racial abuse;
- mental health;
- radicalisation; misinformation, disinformation and conspiracy theories;
- cybercrime;
- relationship abuse;
- sharing of nude/semi-nude images; and
- trafficking.

Additional safeguarding vulnerabilities also apply to:

- young carers;
- children living in temporary accommodation;
- children at risk of financial exploitation;
- child-to-parent abuse;
- children affected by parental imprisonment;
- modern slavery and National Referral Mechanism referrals;
- misogyny and misandry; and
- children with significant health conditions.

Child-on-Child Abuse: This form of abuse occurs when there is any kind of physical, sexual, emotional or financial abuse or coercive control exercised between children. It can include, but is not limited to bullying, cyberbullying, sexual violence, sexual abuse, harassment, harmful sexual behaviour, upskirting, initiation and hazing type violence and taking and/or sharing inappropriate images. We recognise that the behaviour in question is harmful to both the perpetrator and the victim. Behaviour may be intimate or non-intimate. Further details can be found in the Child-on-child abuse section of this policy.

Child Sexual Exploitation: is a form of child sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation.

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- 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 later; and
- Children who regularly miss school or education or do not take part in education.

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

Child Criminal Exploitation (CCE): where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into a criminal activity.

Some 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 can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Indicators can be:

- 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.

CSE and CCE can affect both male and female children and can include children who have been moved for the purpose of exploitation (trafficking).

County Lines: is a specific form of CCE, where vulnerable people are exploited to become involved in transporting illegal drugs within the UK.

Cybercrime: Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cybercrime. Concerns about a child in this area should be shared with the DSL who should consider referring the child into the Cyber Choices programme.

Serious violence: All staff are aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational 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.

Domestic Abuse: can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

'Honour Based' Abuse : encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage, and practices such as breast ironing.

Female Genital Mutilation: Whilst all staff should speak to the DSL if they have concerns about FGM, there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Mental Health: All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. The College can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, and they should speak to the designated safeguarding lead or a deputy.

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 of both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. If staff are concerned they should discuss with the DSL. In addition, since February 2023, it

has been a crime to carry out any conduct to cause a child to marry before their 18th birthday.

Special Educational Needs and/or Disabilities: Pupils with SEND are potentially at greater risk of harm and may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- 1) Assumption is that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- 2) The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- 3) Communication barriers and difficulties in overcoming these barriers.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Children who are absent from education: A child being absent from school for prolonged periods or on repeat occasions can act as a warning sign to a range of safeguarding issues, including neglect, CSE and CCE. All unexplained absences from College will be investigated. (ref. *Missing Child Policy*). This helps prevent the risk of them becoming a child missing in education in the future.

The College shall inform the local authority of any pupil who is going to be added to or deleted from the College's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration)(England) Regulations 2006 (as amended). This will assist the local authority to:

- a) Fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) Follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The College will provide the local authority with the full name and address of all pupils of compulsory school age who have been recorded with code I (illness) and who the school has reasonable grounds to believe will miss 15 days consecutively or cumulatively because of sickness. The College will also provide the local authority with the details of any child who has been absent from College without permission for 10 days.

Action should be taken in accordance with this policy if any absence of a pupil from the College gives rise to a concern about their welfare.

Homelessness/living in temporary accommodation: being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

Upskirting: It is a criminal offence for someone to take a picture under a person's clothing without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear).

Extremism: 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).

Practice (1) – Dealing with Concerns about a Child

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

Abbey Gate College recognises the importance of both Universal Services and Community-Based Early Help and Targeted Early Help delivered through Family Help arrangements. Children and families should receive support as early as possible in order to prevent concerns escalating. Where appropriate, the DSL may make referrals to Family Help services and participate in Team Around the Family meetings, family assessments and multi-agency planning processes. [\[Keeping children safe in education 2026 | PDF\]](#)

If staff have any concerns about a child's welfare, they should act on them immediately. See page 23 for a flow chart setting out the process for staff when they have concerns about a child.

If staff (including governors, agency staff and volunteers) believe that a child is in imminent danger or at risk of harm, they should make an immediate referral either to the Police (**Police non-emergency number 101**) or to our local children's social care – i-ART Team (Ref: [Safeguarding children partnership contact information](#)).

Other cases would be discussed with the Cheshire West and Chester Safeguarding Children in Education (SCIE) Team where appropriate routes for support would be considered eg TAF (Team Around the Family) or Family Help.

Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care where gaining consent might place a child at risk. (Ref: [Flowchart of actions to be taken when there are concerns about a child](#)). If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.

When a child is not in immediate danger but there is a general concern about the child, this should be alerted to the DSL/DDSL through a conversation. If it is necessary to use

email or teams to raise the concern, the messages will not mention the pupil's name but raise the alert for the necessity for there to be a conversation. iSAMS is used to record all safeguarding concerns. Confidentiality, care and consideration will be given when using internal systems of communication when raising concerns.

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe and be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan).

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.

Family Help. All staff are expected to identify when a child may benefit from Family Help. Family Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. There will be a differentiated approach between action taken for those children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies. Any child may benefit from Family Help, but all College staff should be particularly alert to the potential need for Family Help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has medical needs that are causing safeguarding concerns
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Within College, all staff are aware that children with SEN and disabilities are more prone to peer group isolation than other children and provide additional support for these pupils.

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must follow the relevant procedure below. All staff should:

- 1) Listen carefully
- 2) Avoid asking leading questions
- 3) Reassure the individual that the allegation/complaint will be taken seriously
- 4) Not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that correct action is taken.
- 5) Create a written account of the disclosure as soon as possible after the conversation.

All concerns, discussions and decisions (together with reasons) made under these procedures will be recorded in writing. This record will include the date, time and place of the conversation and details about what was said and done by whom and in whose presence; iSAMS is used for safeguarding records.

Wherever possible, staff are aware of the need to have a conversation with the DSL (Designated Safeguarding Lead – or DDSL (Deputy Designated Safeguarding Lead), who will help staff decide what to do next.

Options include:

- 1) Managing any support for the child internally via the College's own pastoral support processes;
- 2) A Family Help assessment; or
- 3) A referral for statutory services, as in the child is in need or suffering or likely to suffer harm.

In considering the options available, the College will ensure that the pupil's wishes and feelings are taken into account. The College operates with the best interests of the pupils at their heart.

In the first instance, staff (including governors, agency staff and volunteers) who consider that a pupil may benefit from Family Help will discuss this with the College's DSL. The DSL will consider the appropriate action to take in accordance with guidelines of the Cheshire West and Chester Safeguarding Children Partnership (SCP). The DSL will liaise with external agencies and professionals in an inter-agency assessment, as appropriate. The DDSL (Deputy Designated Safeguarding Lead) should be referred to in the absence of the DSL. In the event of neither of these staff being available, there should not be a delay in taking appropriate action and staff will speak to a member of the College Leadership Team and/or take advice from local children's social care (Ref: [Safeguarding children partnership contact information](#)). In these circumstances, any action taken should be shared with the DSL/DDSL as soon as is practically possible.

Staff are aware that they may be required to support other agencies and professionals in a Family Help assessment, in some cases acting as the lead professional. Any such cases will be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Where staff are involved in such cases, information will be recorded and stored confidentially within pupil's safeguarding file and in line with the College's data protection policies.

Child in Need. A child in need is defined under the Children Act (1989) as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. 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).

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act (2004) if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based abuse, and extra-familial threats like radicalisation and sexual exploitation.

Practice (2) – Child-on-Child Abuse

Abbey Gate College has a zero tolerance approach to child-on-child abuse, which can include sexual violence, harmful sexual behaviour (HSB) and sexual harassment and can happen both inside and outside of school and online. Child-on child abuse should never be passed off as banter, harmless behaviour or part of growing up, and is considered a safeguarding issue.

All staff are aware that safeguarding issues can manifest themselves through child-on-child abuse and know that if they have any concerns regarding child-on-child abuse, they speak to the DSL or DDSL. All staff are aware that even if there are no reported cases of child-on child abuse, this does not mean that this is not happening.

The College promotes a culture of respect and will challenge sexist, misogynistic, misandrist, racist, homophobic or discriminatory language and behaviour at the earliest opportunity.

All staff will immediately challenge inappropriate behaviours between peers and be aware that downplaying certain behaviours, for example dismissing sexual harassment as 'just banter' can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse. KCSIE 2026 on

child-on child sexual violence, HSB and sexual harassment is used to determine how the College's response to all signs, reports and concerns of child sexual violence and harassment. It is important to recognise that not all children may not feel ready to disclose (or how to disclose) abuse and may not recognise their experiences as harmful.

Child-on-child abuse can happen online and/or face to face and is most likely to include, but may not be limited to:

- 1) Bullying (including prejudice-based and discriminatory bullying);
- 2) Online abuse;
- 3) Abuse in intimate personal relationships between peers;
- 4) Physical assault 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);
- 5) Sexual violence, such as rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- 6) Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand alone or part of a broader pattern of abuse.
- 7) 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.
- 8) Consensual and non-consensual sharing of nudes and semi-nude images and or videos;
- 9) Upskirting, (taking a picture under clothing without permission; applicable equally to all genders).
- 10) 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 are aware that all pupils must be taken seriously if they report that they are victims of abuse and they must be kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

Records of allegations of child-on-child abuse are kept on iSAMS.

The action taken by College on the report of abuse will be determined by the seriousness of the allegation made. A pupil against whom an allegation of abuse has been made may be suspended from the College during the investigation. College will take advice from the SCP on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the College will ensure that, subject to the advice of the SCP, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the College and advice will be sought as necessary from the SCP and/or the Police as appropriate.

Procedures for Dealing with Child-on-Child Abuse at the Senior School

- 1) It is important that pupils know they have someone to turn to if they feel they are the subject of child-on-child abuse. Teachers will listen carefully to all accounts and try not to make quick assumptions. All relevant information is recorded. Reports will be dealt with promptly by the Form Tutor/Head of Year with support from Leadership Team where necessary (Deputy Head (Pastoral)/Senior Deputy Head).
- 2) All information is recorded on iSAMS and a log of all incidents of child-on-child abuse is kept with the Deputy Head (Pastoral), who is responsible for monitoring records to identify any patterns or trends which should be brought to the attention of relevant staff.
- 3) When dealing with reports, the priority is to stop the abuse, work with the victim and then the perpetrator as appropriate.
- 4) The College would seek to ascertain the truth of the incident through careful discussions with the victim and the perpetrator respectively.
- 5) Initially, the DSL will talk with the victim in a safe context in order to clarify and assess the nature of the allegation.
- 6) The DSL would then speak in a similar way with the named perpetrator.
- 7) Following this initial investigation, parents will be informed unless such action would put a child at risk.
- 8) If circumstances require, the College will involve external agencies for appropriate support.
- 9) Further interviews may then take place with additional staff support as appropriate and with parents if desired.
- 10) The College's next actions, including support and sanctions, are then determined by the nature of the incident, the wishes of victim and the advice or guidance received as applicable.
- 11) The College commits to improve any policies, practices or procedures if, following the outcome of an incident, it is believed that these would strengthen our safeguarding provision in general.

In instances of repeated actions, which may be more appropriately understood as bullying, the College adheres to our *Anti-Bullying Policy*.

Practice (3) – Online Safety

All staff and governors are trained with regard to safeguarding and online threats. The College's Board of Governors supports the College Leadership Team in ensuring that all pupils are taught about on-line safety risks (which can be categorised into four areas (the 4 C's) of content, contact, conduct and commerce) through the curriculum and PSHE (Personal, Social, Health, Economic Education) to help children to adjust their behaviours in order to reduce risks and keep themselves safe. Furthermore, the 4 C's are used by the College when assessing online safety risks.

The College will ensure pupils are taught about emerging online risks including:

- Generative artificial intelligence;
- AI-generated imagery and deepfakes;
- misinformation and disinformation;
- online scams and financial exploitation;

- phishing attempts;
- harmful extremist material;
- online grooming;
- exposure to violent or disturbing content.

Full details are available in our *PSHE & RSE Policies*. Roles and responsibilities around the ensuring of Online Safety are detailed in the *Online Safety (including Pupil Acceptable Use) Policy*. The Board of Governors receives an annual update on the Filtering and Monitoring Software used by the College through the Pastoral and Wellbeing sub-committee.

Internet and online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material thus providing them with a safe environment in which to learn. Staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images (AI or real), especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

The College has appropriate filtering and monitoring software in place and age-appropriate rules around the use of mobile phones during the school day. The College undertakes active filtering and monitoring of devices during the College day and passive monitoring outside of College hours. Any incidents detected during passive monitoring will be responded to promptly on our return to College. Filtering and monitoring provision is shared with the Governing body and reviewed at least annually. Additionally, measures to protect the College from cyber-crime and safeguards to ensure the limiting effects of such an attack are in place.

Filtering and monitoring systems will be subject to formal review at least annually. Reviews will be undertaken by the member of the Senior Leadership Team with responsibility for filtering and monitoring alongside the DSL and IT support personnel.

These reviews will consider:

- effectiveness of filtering;
- effectiveness of monitoring;
- coverage across all internet-connected devices;
- effectiveness when pupils access technology off-site;
- emerging safeguarding risks.

Written records of reviews and actions taken will be maintained.

Further details of the College's approach to online safety can be found in the *Online Safety Policy*.

In all cases, if staff are unsure, they know to speak to the designated safeguarding lead or a deputy.

Practice (4) – Making and Sharing of Nude/Semi-Nude Images (including AI)

This refers to the the sharing of sexual, naked or semi-naked images or videos, or sending sexually explicit messages; previously called “sexting”. Creating or sharing images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they:

- 1) Take or create an explicit photograph or video of themselves or a friend
- 2) Share an explicit image or video of a child, even it if is shared between children or the same age
- 3) Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

All incidents of suspected sharing of nude/semi-nude images are reported to the DSL.

Further information about nude/semi-nude images is available from: www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/. When dealing with issues relating to inappropriate images, the guidelines published by UK Council for Child Internet Safety (UKCCIS) will be followed: ‘Sexting in schools and colleges: Responding to incidents and safeguarding young people’.

In the event of disclosures about child-on-child abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by an identified adult in College and support from external agencies will be sought, as appropriate. If a child discloses concerns about child-on-child abuse, this is treated by staff as any other safeguarding issues. Staff do not promise confidentiality, but they listen carefully, are non-judgemental and make notes as soon as possible during/after the disclosure. This is then reported to the DSL (DDSL). Where at all possible, staff must not view or forward illegal images of a child and must be prepared, in some cases, where appropriate, to confiscate any devices to preserve any evidence and hand them to the police for inspection.

Practice (5) – Child on Child Sexual Violence and Sexual Harassment

Staff are aware that sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary education and that it can involve individual children or a group of children and can occur online and/or face to face (both physically and verbally) and is never acceptable. All staff are advised to maintain an attitude of ‘it could happen here’.

It is made clear to all staff and students that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. And failure to do so 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.

All staff are trained to recognise, acknowledge, and understand the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

All physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts must be challenged. Dismissing or tolerating such behaviours risks normalising them. Such harmful sexual behaviours (HSB) can be seen as part of a continuum leading to sexual violence.

Any report of HSB, sexual violence or sexual harassment will always be taken seriously. The nurturing and caring environment created at Abbey Gate College encourages and enables pupils, through building trusted relationships, to approach adults with any concerns. The support network directly available to pupils includes: Class Teachers, Form Tutors, Heads of Year, Head of Pastoral (DSL), Deputy Safeguarding Leads, School Nurse and ELSA practitioners.

Where there is a concern, staff immediately refer to DSL/DDSL who will take appropriate steps and involve other agencies as required.

In cases of alleged child on child sexual violence and sexual harassment, College will follow Government advice as published in part five of 'Keeping Children Safe in Education September 2026. Response will be on a case-by-case basis and support will be sought from children's social care and the police if required. Staff will respond to concerns as with all other safeguarding issues. Following a report of sexual violence, the DSL (or DDSL) will make an immediate risk and needs assessment, considering:

- the victim – especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all other children (and if appropriate adult students and staff) at the school or College, especially any actions that are appropriate to protect them from the alleged perpetrator(s), bullying or from future harm.

Written records will be kept and at all times College will be actively considering the risks posed to all pupils.

Considerations will include:

- the wishes of the victim in terms of how they want to proceed will be balanced with the College's duty and responsibility to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed;
- the ages and developmental stages of the children involved;
- any power imbalance between the children;

- If the alleged incident is a one-off or a sustained pattern of abuse;
- the understanding that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- the importance of understanding intra-familial harms and any support necessary for siblings following the incident
- whether there are there ongoing risks to the victim, other children, adult students or school or College staff; and,
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Regardless of whether a child is convicted of a crime or not, all the children involved will be protected.

If an allegation is shown to be deliberately invented or malicious, consideration will be given as to whether any disciplinary action is appropriate against the individual and ongoing support will be offered to the alleged perpetrator.

Practice (6) – Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. All staff are alert to the fact that exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. If staff have any concerns or suspicions of a child being a victim of modern slavery then this must be reported to the DSL/DDSL immediately.

Practice (7) – Serious Violence

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, 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.

The likelihood of involvement in serious violence may be increased by factors such as:

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

Serious violence includes behaviour involving weapons, threats involving weapons, assault causing significant injury, organised violence, gang association and exploitation. Staff must immediately report concerns regarding possession, carrying, use or threat of use of weapons.

The DSL will consider:

- risk assessment;
- contextual safeguarding risks;
- support and safety planning;
- referrals to relevant agencies;
- intervention strategies.

All staff need to be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence. Again, any suspicions that a child is at risk from, or involved with, violent crime must be raised immediately with the DSL/DDSL.

Practice (8) – Radicalisation and Prevent Duty

The Prevent duty (Section 26 of the Counter-Terrorism and Security Act 2015 (CTSA 2015)) requires specified authorities such as education, health, local authorities, police and criminal justice agencies (prisons and probation) to help prevent the risk of people becoming terrorists or supporting terrorism. It sits alongside long-established safeguarding duties on professionals to protect people from a range of other harms, such as substance abuse, involvement in gangs, and physical and sexual exploitation. The duty helps to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding processes.

Staff are aware that radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Most people who commit terrorism offences do so of their own agency and dedication to an ideological cause. There are many factors which can, either alone or combined, lead someone to subscribe to terrorist or terrorism supporting ideology. These factors often include exposure to radicalising influences, real and perceived grievances – often created or exacerbated through grievance narratives espoused by extremists – and a person's own susceptibility. A person's susceptibility to radicalisation may be linked to their vulnerability. A person can be vulnerable if they need special care, support or protection because of age, disability, risk of abuse or neglect. In other cases, vulnerabilities may not be present. Not all people susceptible to radicalisation will be vulnerable, and there are other circumstances, needs or other underlying factors that may make a person susceptible to radicalisation. Additionally, there is a growing concern that an interest in violence itself can lead to an increased risk of radicalisation, for example through 'the Com' networks.

Government analysis of the Terrorism Act offenders found that online radicalisation has become the predominant pathway for an increasing proportion of offenders. The College seeks to protect pupils from such online threats, as per Practice 3.

As with other safeguarding risks, staff are alert to changes in children's behaviours, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately and follow the College's normal referral processes (as per Practice 17)

when there are concerns about children who may be at risk of being drawn into terrorism or radicalisation. In the first instance, concerns will be discussed with the DSL. Harm to the child, as well as the prevention of wider societal harm, will be considered. A Prevent referral via Cheshire Constabulary or children's social care may be necessary, depending on the level of risk. In an emergency situation, the police will be contacted on 999; or 101 for non-emergencies.

Staff at College follow a training programme, updated every 2 years, to be alert to recognising that pupils may be at risk of being drawn into terrorism or other forms of extremism and safeguarding arrangements are regularly revised to provide protection for pupils.

Practice (9) – Female Genital Mutilation (FGM)

If staff have a concern that a pupil may be at risk of FGM, they will activate College Safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care. If in any doubt, staff will speak to the DSL. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Indications that a girl has been subjected to FGM:

- 1) A pupil may have difficulty walking, sitting or standing and may look uncomfortable.
- 2) A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom.
- 3) There may be prolonged or repeated absences from school and/or noticeable behaviour changes (eg withdrawal or depression) on a pupil's return.
- 4) A pupil is reluctant to undergo medical examination.

Teachers are aware that they have a statutory duty to personally report to the Police where they discover through the course of their work (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they must still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies they must discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) teachers will follow the College's safeguarding procedures and discuss their concerns with the DSL.

In cases where staff discover or suspect 'FGM' this matter must be reported to the Police and the DSL.

Practice (10) – Forced Marriage

Forced marriage is a crime in England and Wales and the College plays a role in safeguarding children from forced marriage. The DSL must be informed if any staff or pupil has concerns regarding forced marriage who will then contact the Forced Marriage

Unit (FMU) for advice and information. Again, since February 2023, it has been a crime to carry out any conduct to cause a child to marry before their 18th birthday.

Practice (11) – Children who are absent from Education

When children are absent from education, particularly on repeat occasions, this a potential indicator of abuse, neglect or CCE. The College will report to Cheshire West and Chester a pupil who fails to attend school regularly or has been absent from College without the College's permission for a continuous period of 10 school days or more. The College has an Attendance Officer who follows procedures as detailed in the *Attendance Policy* and *Registration Policy*. The College has a clear and regularly reviewed *Missing Child Policy* and follows the guidance in *Working Together to Improve School Attendance*.

The College hold a minimum of 2 emergency contact numbers for each pupil.

Practice (12) – Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and occur where an individual or a group takes advantage of the imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or to watch sexual activities, encouraging children to behaviour in sexually inappropriate ways or grooming a child via the internet.

This is not just restricted to age, but can also include gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. This type of abuse can be perpetrated by individuals or groups, males or females, and children or adults as one-off incidents or repeated over time and may happen without the child's immediate knowledge eg through others sharing videos or images of them on social media. Victims can be exploited even when activity appears to be consensual and is not restricted to children from special economic backgrounds. The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same. Both boys and girls who are criminally exploited may be at higher risk of sexual exploitation. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise that they are being exploited e.g. they believe that they are in a genuine romantic relationship. Increased absence, changes in friendships or relationships with older individuals or groups, significant decline in performance, signs of self-harm or changes in wellbeing, unexplained injuries are signs that a young person is at risk. Staff are aware that any concerns should be reported to DSL/DDSL.

Practice (13) – Children Potentially at Greater Risk of Harm

Children may need a social worker due to safeguarding or welfare needs. A child's experiences of adversity and/or trauma can leave them vulnerable to further harm, as well as educationally disadvantaged. The LA should share the fact a child has a social

worker. The DSL will hold and use information so that any decisions and actions can be taken in the best interests of the child.

Children who are absent from school for prolonged or on repeat occasions may be at greater risk of harm and these absences can act as a visual sign of safeguarding risks. The College acts in accordance with attendance and reporting regulations to help prevent these risks and the child becoming a child missing in education (CME) in the future and the subsequent risks associated with this. (See Practice (11))

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can also exist when recognising abuse, neglect and exploitation in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Reports of abuse involving children with SEND require close liaison with the DSL/DDSL and the Head of LE.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

Gender questioning cut from here and placed below.

Practice (14) – Mental Health (see also *Wellbeing and Mental Health Policy*)

Mental health awareness is a priority at Abbey Gate College with a significant number of staff being trained as Mental Health First Aiders, with the DSL/Deputy Head (Pastoral) as the Mental Health Lead. This enables staff to be aware that mental health problems, in some cases, can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Details of Mental Health First Aiders are displayed in College.

Safeguarding responsibilities with respect to mental health include consideration of:

- suicidal ideation;
- self-harm;

- eating disorders;
- anxiety disorders;
- trauma-related difficulties;
- serious emotional distress.

The College will work collaboratively with parents, NHS services, MHST teams, GPs and external agencies where concerns arise.

Staff should be aware that pupils experiencing mental health difficulties may be particularly vulnerable to abuse, neglect and exploitation.

Every opportunity is taken within the College to reinforce the importance of pupils understanding about the importance of caring for their mental health. Staff are available to pupils to speak to about their concerns and this is supplemented by the support of our ELSA trained staff.

We acknowledge that while only appropriately trained professionals would diagnose mental health problems, staff are well placed to observe children and identify mental health concerns that are treated as safeguarding matters and take immediate action by speaking to the DSL or DDSL (Designated Safeguarding Lead/Deputy Designated Safeguarding Lead).

Should the College determine that a pupil's mental health needs exceed the level of support it can reasonably be expected to provide, or that the pupil may pose a safeguarding risk to themselves or others, the College will implement its Mental Health Risk Assessment tool (Appendix 8) to inform subsequent actions. This process will be undertaken in consultation with both the pupil and their parents.

Practice (15) – Looked after and previously looked after children

The most common reason for a child to become looked after or previously looked after is abuse or neglect. As such, additional skills are needed to ensure the safety of these children. All teaching staff are trained in being trauma-aware and the College ensures that access to information, including their looked after legal status and parental responsibility is known and where appropriate shared. Staff are aware that a previously looked after child remains vulnerable and the important in prompt and inter-agency working to safeguard these children.

Practice (16) – Children who are Questioning their Gender

There remains many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

The College advises families/carers who are making decisions about support for gender questioning children to seek clinical help and advice. As such, when supporting a gender questioning child, the College takes a cautious approach and evidence-informed approach, as well as considering the broad range of their individual needs, in partnership

with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child).

Consideration will be given to:

- safeguarding implications;
- clinical advice;
- record keeping;
- wellbeing of the child;
- family circumstances;
- toilets and changing arrangements;
- sporting activities
- residential visits and overnight accommodation;
- relationships with peers.

Decisions will be made individually and reviewed regularly. All decisions will be based on legitimate aim and proportionally.

In line with the Education (Independent School Standards) Regulations 2014, the College will not allow pupils into toilets, changing rooms or residential accommodation designated for the opposite sex. Similarly, where sporting activities are designated single-sex due to safety reasons, there will be no exceptions and pupils will not be allowed to participate in sports designated for the opposite sex. These constraints will be explained to parents sensitively and in line with part 6 of the Equality Act.

Trusted adults with whom they can be open are important for children who are questioning their gender. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with trusted members of staff.

Practice (17) - Operation Encompass

Abbey Gate College participates in Operation Encompass. Both the DSL and DDSL have completed the Key Adult training.

Operation Encompass enables police to notify schools where they reasonably believe a child has been affected by domestic abuse.

The Designated Safeguarding Lead (or DDSL) will:

- receive and securely record notifications;
- consider immediate safeguarding support;
- assess any educational or emotional needs;
- facilitate appropriate pastoral support;
- share information on a need-to-know basis only;
- maintain confidential safeguarding records.

The College recognises that children affected by domestic abuse may require support even where they have not directly witnessed any incident.

Practice (18) – Safeguarding Children: Key Points

All adults in charge of or in contact with children or young people will know what to do if they suspect that someone is being physically, emotionally or sexually abused or neglected, or if someone tells them that this is happening. Staff will be familiar with the Safeguarding Policy; copies of which are available internally with all College policies and also on the College's website. Printed copies can be provided on request.

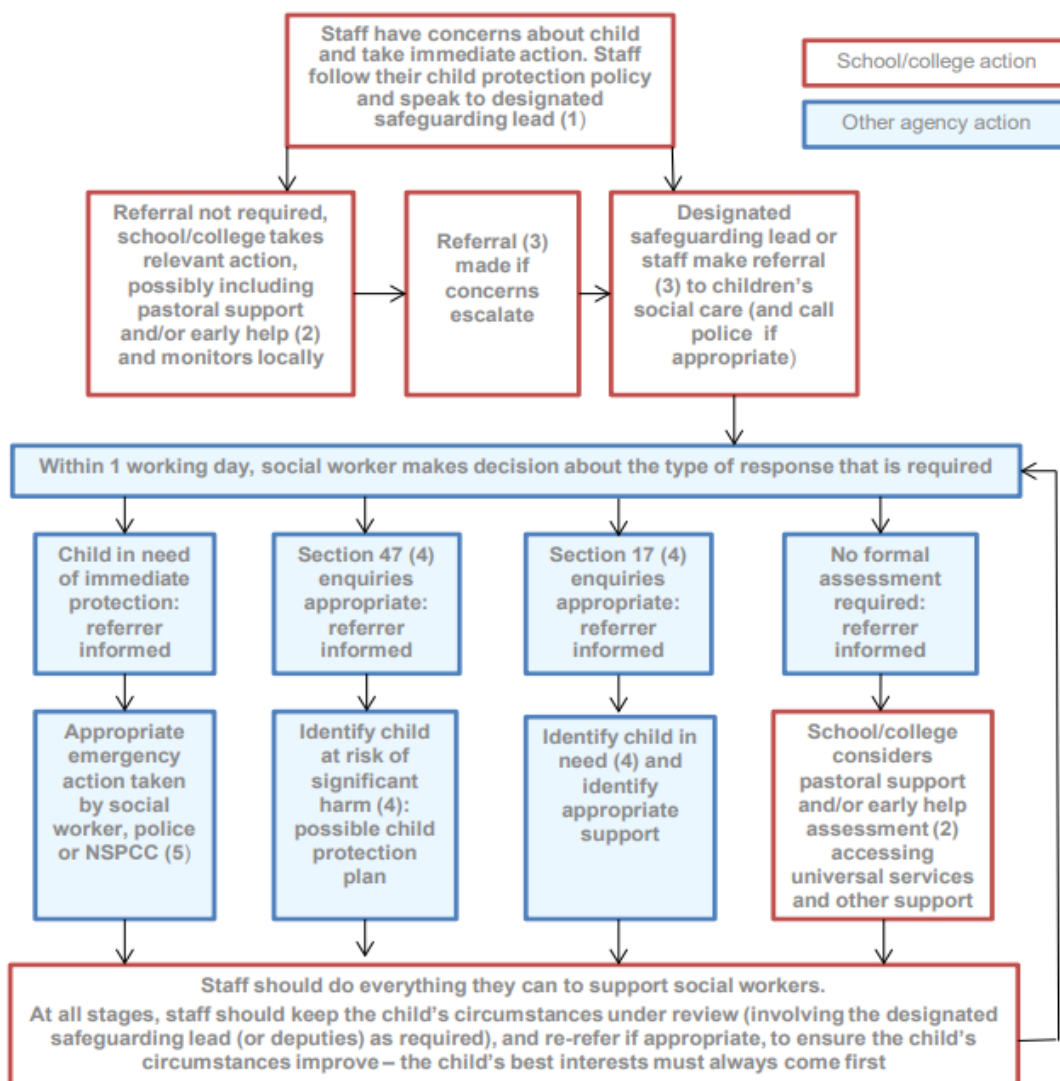
In addition, the following key points give a guide on what to do and not to do:

- 1) **Always** stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse. Give reassurance that they are being taken seriously.
- 2) **Never** ask to view or forward illegal images or examine a child.
- 3) Make a note of what was said or observed as soon as possible on iSAMS
- 4) Never make a promise that you will keep what is said confidential or secret. If you are told about abuse you have a responsibility to tell the right people to get something done about it. You should explain that if you are going to be told something very important that needs to be sorted out, you will need to tell the people who can sort it out, but that you will only tell the people who absolutely have to know.
- 5) Do not ask leading questions that might give your own ideas or what might have happened e.g. 'did he do X to you?' Just ask, 'what do you want to tell me?' or 'Is there anything else you want to say?'
- 6) Immediately tell the DSL unless they are the subject of the accusation. Don't tell other adults or young people what you have been told. If someone has made an accusation to you or you have concerns about the Head Teacher, you should report your concerns to the Chair of Governors – Mr Gareth Lee.
- 7) Discuss with the DSL whether any steps need to be taken to protect the person who has told you about the abuse.
- 8) **Never** attempt to carry out an investigation of suspected or alleged abuse by interviewing people etc. The Local Authority Designated Officer (LADO) or Children's Social Care Officers and police officers are the people trained to do this. You could cause more damage and endanger possible criminal proceedings. **It is your duty to refer concerns on, not investigate.**
- 9) As soon as possible (and certainly the same day) the DSL, or the Chair of Governors (where the allegation is against the Head Teacher), should refer the matter to The Local Authority Designated Officer (LADO) or the Contact and Referral Team (helped by your notes). Follow their instructions about what to do next. They will set up any necessary investigations. That is their statutory job.
- 10) **Never** think abuse is impossible in your own organisation or assume that an accusation against someone you know well and trust is bound to be wrong.
- 11) Children and young people often tell other young people, rather than staff or other adults about abuse. Therefore, you may hear an allegation from another child. This should be acted upon in exactly the same manner as outlined above.

Practice (19) – Flowchart of Actions to be taken when there are Concerns about a Child

This diagram illustrates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate and serious harm to a child, a referral should be made to children's social care. References in the footnotes refer directly to the Keeping Children Safe in Education 2023 document.

Actions where there are concerns about a child



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

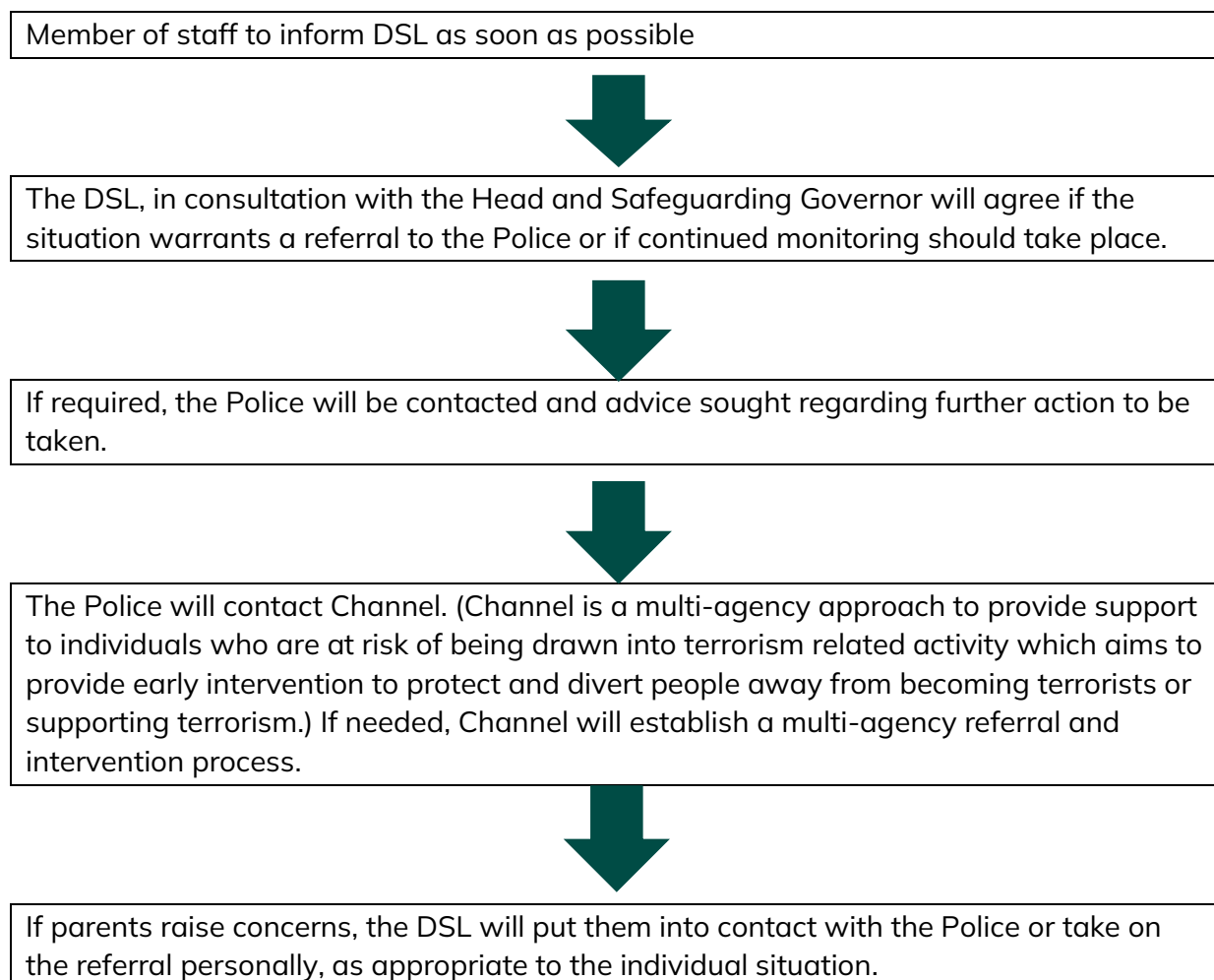
(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance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

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [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 Chapter one of [Working Together to Safeguard Children](#).

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

Practice (20) – Flowchart of Actions to be taken where there is a Concern about a Pupil being Vulnerable to Terrorism



Practice (21) – Safer Recruitment

The College is committed to ensuring that it never knowingly employs to work with children if they are 'disqualified' from doing so and it therefore follows government guidelines in its safer recruitment processes. Members of the CLT and HR are trained in Safer Recruitment. Members of the teaching and non-teaching staff at the College, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, checking qualifications, prohibition from teaching or management, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history, performing an online search via an online search engine and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. If not available at the time of appointment the school will do a separate 'barred list' check and a risk assessment to check if it is safe for a prospective

member of staff to start their employment, with supervision in place, until the original DBS certificate is seen.

Alternatively, if the applicant has subscribed to it and gives permission, the College may undertake an online update check through the DBS Update Service.

Full details of the College's safer recruitment procedures for checking the suitability of staff is set out in the College's *Safer Recruitment Policy* which conforms to the requirements of KCSIE 2026.

The College has protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised.

Where a parent or other volunteer helps on a one-off basis, he/she will only work under the direct supervision of a member of staff, and at no time have one to one contact with children. However, if a parent or other volunteer is to be in school regularly or over a longer period then they will be checked to ensure their suitability to work with children, as per Practice (27).

We will ensure that all volunteers receive guidance on the parameters of their role and what to do if they have concerns before they start their work with the College.

Practice (22) – Allegations of Abuse against Teachers & other Staff (including the Head, Governors, Trainee teachers and Volunteers)

Staff have been instructed to refer any concerns that they have about other members of staff directly to the Head. Where there are concerns about the DSL (Designated Safeguarding Lead), these will be made to the Head without the DSL being informed. Where there are concerns about the Head, this should be referred to the Chair of Governors without the Head being informed.

Staff (including supply staff, trainee teachers and volunteers) must adhere to the College's *Code of Conduct* in relation to the nature of their behaviour towards pupils. Guidelines are given to staff for the protection of pupils and themselves. The *Code of Conduct* gives specific information in relation to specialist settings and these include specific types of activity, involving 1:1 Lessons for music and SEND which must always be timetabled and approved by parents. Rooms in which 1:1 lessons take place should either have vision panels in the door or their doors left ajar when in use.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse will be referred to the Police.

As part of an open and transparent culture in Abbey Gate College, all concerns about adults working in or on behalf of the College are reported. There is a 'harm' level threshold criteria that will be used to determine the action that is taken and it is important, in all cases, that staff take responsibility to share concerns to enable College to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear

about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the College.

A 'low-level' concern is any concern that an adult working in or on behalf of the College may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Examples of such behaviour are listed in KCSIE 2026 to include, but are not limited to: being over friendly with children; having favourites; taking photographs of children on their mobile phone; engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or humiliating children. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings. Low-level concerns are not included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

Where a low level concern has been raised, the Head should collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously; to the individual involved and any witnesses. The information collected will help them to categorise the type of behaviour, including whether wider cultural issues enabled the behaviour to occur, and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken (either through internal processes or via referral to the LADO). The Chair of Governors should be informed. Staff are also encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

The College's procedures for managing allegations against staff who are currently working in the College follows Department for Education statutory guidance and Cheshire West and Chester arrangements and applies when staff (including supply staff and volunteers) have (or are alleged to have):

- behaved in a way that has harmed a pupil, or may have harmed a pupil;
- possibly committed a criminal offence against or related to a pupil; or
- behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

There are two aspects to consider when an allegation is made:

- 1) Looking after the welfare of the child - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- 2) Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action including when and how to inform individual of the allegation.

If an allegation is made against anyone working with children in the College, the College should not undertake their own investigation of allegations without prior consultation with the Local Authority Designated Officer (LADO) or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the College may discuss informally with the 'LADO' on a no-names basis and establish what initial information will be required.

All allegations should be investigated as a priority to avoid any delay.

- 1) All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' – the Head. Where the Head is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Governors. However, staff may consider discussing any concerns with the DSL and may make any referral via them.
- 2) The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the College's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
- 3) The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by the children's social care or the Police. The case manager will advise the individual to contact their trade union representative, or a colleague for support and will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
- 4) The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the College and shall provide them with their contact details. The individual will not

be prevented from having social contact with work colleagues and friends, when suspended, unless there is evidence to suggest this may prejudice the gathering of evidence

- 5) The case manager will ensure that parents are informed as soon as possible and kept informed about the progress of the case, subject to any advice from children's social care or the Police and made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002.
- 6) The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA) should be made aware where an allegation is substantiated and the person is dismissed or the College ceases to use their services, or the person resigns or otherwise ceases to provide their services. The College has a legal obligation to report promptly to the DBS any person (whether employed, contracted, trainee teacher, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. If an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the College must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
- 7) On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the College's safeguarding procedures or practices to help prevent similar events in the future.

The College will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/Teaching Regulation Agency publish information about an investigation or decision in a disciplinary case.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE and a copy will only be provided to the individual concerned.

Allegations proved to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference. The College will provide fair and accurate references in accordance with

safeguarding requirements. Only substantiated safeguarding concerns that meet the relevant threshold will be included in employment references.

If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

The College's *Staff Code of Conduct* provides clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

In accordance with our responsibility under the Safeguarding Vulnerable Groups Act 2006 a referral will be made to the DBS where a member of staff is dismissed (or would have been, had the person not left the setting first) because they have harmed a child or put a child at risk of harm.

Supply Teachers and Contracted Staff: Any allegations made against a supply teacher would be dealt with properly and, should there be safeguarding concerns, this would be referred to the local authority designated officer (LADO) to determine a suitable outcome. If the supply teacher is engaged through an agency, they would be fully involved and co-operate in enquiries from the LADO, police and/or children's social services.

Practice (23) – Reporting Concerns about Safeguarding Practices in College

The College aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the College's safeguarding regimes, these should be raised in accordance with the College's *Whistleblowing Policy*. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the College or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line (Ref: [Contact information for national organisations](#)).

Practice (24) – Response to COVID-19 or other pandemic

This is designed to provide information, whenever may be applicable, about safeguarding our pupils in response to the Coronavirus (COVID-19) outbreak, or similar pandemic or emergency situation. This will be regularly reviewed and updated in line with guidance as issued to educational settings from the Government, Local Authority and the Police.

Our commitment to the safeguarding of our pupils will continue to be a priority and as such our safeguarding principles, will remain the same.

These can be summarised:

- 1) The best interests of children will continue to be our priority.
- 2) If anyone has a safeguarding concern about any child they should take action and act immediately.
- 3) Our Designated Safeguarding Lead and Deputy Safeguarding will continue to support College and pupils with any safeguarding queries and contact details are available in the main policy.
- 4) Children should continue to be protected when they are online.

Child Protection

College is making provision for pupils with Education, Health and Care (EHC) plans in accordance with local authority guidelines.

Where College is providing care for the children of 'Key Workers', a member of the Leadership Team is on site together with a trained first aider and additional staff – numbers are adjusted daily depending upon the number and ages of the children on site. Where the DSL or DDSL is not on site, they are immediately available on telephone or video call if required.

Where appropriate, College continues to work with outside agencies to provide support and protection for vulnerable children.

Attendance

Arrangements have been made with parents who are 'key workers' to ensure that College is aware of who to expect in College on a day to day basis. Arrangements have also been made with these families to assist with travel arrangements as normal bus services are not in operation. The 'daily online attendance form' is completed in accordance with requirements of Department of Education.

Safer Recruitment/Volunteers and Movement of Staff

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children.

When recruiting new staff, Abbey Gate College will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2026) (KCSIE).

If staff are deployed from another education or children's workforce setting to our school, we will take into account the DfE supplementary guidance on safeguarding children and will accept portability as long as the current employer confirms in writing that:

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

Where Abbey Gate College are utilising volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs Keeping Children Safe in

Education 2026. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Abbey Gate College will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

Abbey Gate College follows a rigorous and thorough checking procedure when recruiting staff and this is detailed in our *Safeguarding Policy* and *Safer Recruitment Policy*. These will remain in force.

Whilst acknowledging the challenges of any pandemic, it is essential from a safeguarding perspective that any school is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity.

As such, Abbey Gate College will continue to keep the single central record (SCR) up to date.

Volunteers

Abbey Gate College will use volunteers to assist in handing out and securing medical test kits, as applicable, to students and staff members. Other duties may be required such as building test kits, cleaning down areas and directing people.

Under no circumstances will a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

Volunteers who, on an unsupervised basis provide personal care on a one-off basis in Abbey Gate College, will be in regulated activity. This means that if a volunteer is administering a medical test whilst un-supervised, they will be in regulated activity and therefore require an Enhanced DBS with Barred List check.

Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information).

Supervision must be:

- by a person who is in regulated activity.
- regular and day to day; and
- reasonable in all the circumstances to ensure the protection of children.

In appointing volunteers, the school will follow safer recruitment processes.

Mental Health

Abbey Gate College takes great pride in educating and supporting pupils in understanding and looking after both physical and mental health. A pandemic-related climate will inevitably put different pressures on individuals and as a College we are committed to:

- Keeping in touch with everyone. Both academic work, social and emotional wellbeing resources are on the College's VLE.
- If a member of staff has a concern about a pupil, they should raise this concern with the DSL/DDSL and appropriate action can be taken.
- A Year group Forum can be set up to enable pupils to keep in contact with each other and staff.

Online Safety

All work set by College is through the College's Firefly VLE which is filtered and monitored.

Online teaching operates within the same principles that are set out in the College's Staff Behaviour Policy/Code of Conduct. Where it might be appropriate for College to consider developing the use of further online learning tools and systems, this will be in line with privacy and data protection/GDPR requirements and clear guidelines will be issued to staff and pupils. Procedures will be included to ensure that there is a clear reporting route back to College for any concerns as well as Childline/UK Safer Internet Centre/CEOP.

At the point of school closure being announced by Government, parents are issued with detailed information about how they could support their children at home: 'School Closure – advice to parents handbook'.

Further support for parents and carers to keep their children safe online:

[Internet matters](#) – for support for parents and carers to keep their children safe online.

[London Grid for Learning](#) – for support for parents and carers to keep their children safe online.

[Net-aware](#) – For support for parents and carers from the NSPCC.

[Parent info](#) – for support for parents and carers to keep their children safe online.

[Thinkuknow](#) – for advice from the National Crime Agency to stay safe online.

[UK Safer Internet Centre](#) – advice for parents and carers.

[Parent Zone](#) – for resources to keep children safe online.

The College's *Staff Code of Conduct* provides clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

In accordance with our responsibility under the Safeguarding Vulnerable Groups Act 2006 a referral will be made to the DBS where a member of staff is dismissed (or would have been, had the person not left the setting first) because they have harmed a child or put a child at risk of harm.

Supply Teachers

Any allegations made against a supply teacher would be dealt with properly and, should there be safeguarding concerns, this would be referred to the local authority designated officer (LADO) to determine a suitable outcome. If the supply teacher is engaged through

an agency, they would be fully involved and co-operate in enquiries from the LADO, police and/or children's social services.

Practice (25) – Visitors

Visitors must sign in at the reception on arrival. Visitors will be collected from Reception by the member of staff concerned or escorted to the appropriate area of the College. All visitors must wear the visitor's red or blue lanyard issued to them. Red lanyards must be worn by everyone who has not completed the necessary ID/Safeguarding checks (valid DBS and photographic proof of identification). Blue lanyards will only be issued to visitors for whom these checks are completed and are held by HR.

Delivery personnel, who will be on site for a matter of minutes, are not required to sign in or wear a red lanyard. However, they must report to Reception, who then will ensure there is a designated and appropriate member of staff to meet them in the area they are delivering to. They will then meet them in person, accompany them for the entirety of their time on site without exception; and see them back into their vehicle and off site. All safeguarding and health and safety duties, in relation to delivery personnel are, therefore, the sole and complete responsibility of the aforementioned member of staff.

Any member of staff who observes an unsupervised visitor or person they do not recognise should (provided they do not feel threatened) enquire if the person needs assistance and escort them to Reception or off site if necessary. Students who observe such a visitor should immediately seek and inform the nearest staff member. If an unsupervised person is uncooperative in going to Reception or leaving the site, or a member of staff feels threatened, or is threatened with violence, or a violent attack takes place, immediate help from the Police should be sought by telephone.

Practice (26) – Volunteers

All volunteers must be risk-assessed using the form in Appendix 7 prior to having any interactions with pupils and no volunteers on whom no checks have been made are left unsupervised or allowed to work in regulated activity.

If the risk-assessment indicates the volunteer should be supervised, this must be by a person who is in regulated activity relating to children, regular and day to day, and reasonable in all the circumstances to ensure the protection of children.

Volunteers who teach, train, instruct, care for or supervise children on a frequent basis, for more than three days in any thirty-day period, or overnight require an Enhanced DBS certificate including a children's barred list check.

The Head and DSL will determine required safeguards and vetting arrangements before any volunteering activity commences.

Volunteer risk assessments will be completed and retained.

Practice (27) – Visiting Speakers

The College's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the College and British values.

The College will assess any risks before agreeing to a visiting speaker being allowed to attend the College. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the College may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided. Visiting speakers, whilst on the College site, will be signed into the premises, and be supervised by a College employee. On attending the College, visiting speakers will be required to wear a visitor's badge.

Practice (28) - Use of school or college premises for non-school/college activities

The College ensures that organisations or individuals renting the College's facilities/premises have appropriate arrangements to keep children safe. The Estates Manager ensures safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; inspects safeguarding and child protection policies and procedures and ensures that failure to comply with this would lead to termination of the agreement.

Practice (29) – Disqualification from Working in Childcare

Where staff work in, or are involved in the management of the College's Early Years or provision of care of pupils under the age of eight, the College will take steps to check whether those staff are disqualified under the Childcare Act 2006. This forms part of the College's safer recruitment practices, further details can be found in our *Safer Recruitment Policy*.

The College records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Staff who are disqualified, may apply to Ofsted for a waiver of disqualification, unless they are barred from working with children. Where a member of staff is found to be disqualified, or if there is doubt over that issue then, pending resolution, the College will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be automatic response; the College will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

Practice (30) – Mobile Phones/Devices and Cameras/Use of Images

The College has specific policies in relation to the appropriate use of ICT, including mobile devices and cameras, the use of images and the protection of children. (See Online Safety/Pupil Acceptable Use Policy & Smart Technology Policy). The College is a mobile phone-free environment.

Children in the EYFS at the Infant and Junior School have their photographs taken to provide evidence of their achievements for developmental records. The College's digital camera should be used for this purpose. Staff, visitors, volunteers and students are not permitted to have their own mobile phones or cameras in EYFS.

ISA has sent formal advice to all schools to be careful with any images of pupils, in promotional shots, where a member of the public, with malicious intent, may be able to take the child's face and insert it into a different and entirely unacceptable, alternative image. This has actually happened to some schools, followed by criminal, financial demands. Following ISA's guidance, any photographs taken of pupils, for potential posting on social media, website, or other digital publications:

- DO NOT show an individual child's face in full, frontal profile (such as may easily be cut and pasted elsewhere)
- DO show children from behind, in groupings, in side profile, or partially obscured (such that any individual cut/paste would be notably difficult)
- DO consider potential safeguarding implications, before taking the shot (for example, young people in tracksuits or similar, rather than revealing kit - for both male and female)
- NEVER include names, class details, or location metadata alongside images.

Further guidance on protecting images from AI manipulation and abuse can be found in Appendix 10 - [UK Online Harms Early Warning Working Group - Protecting your setting's images from AI manipulation and abuse](#) - and all staff should make themselves familiar with this guidance before photographing or 'publishing' any images of pupils.

Roles & Responsibilities (1) – Safeguarding Governor, DSL, DDSL

The Safeguarding Governor is the board-level lead designated to take a lead in relation to responsibility for safeguarding arrangements in the College. (Although all Governors are trained at induction and regularly thereafter in Safeguarding.) Meetings are held termly to consider all safeguarding matters.

A full review of the College's Child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation to ensure that there is adequate provision for the appropriate action to be taken in a timely manner to safeguard and promote children's welfare. This ensures that a child's wishes and feelings are taken into account when determining what action to take and which services to provide. Children are encouraged to share their concerns in

the knowledge that they will be taken seriously and knowing that they can safely express their views.

If there has been a substantiated allegation against a member of staff, the College will work with the Local Authority Designated Officer (LADO) to determine whether there are any improvements to be made to the College's procedures or practice to help prevent similar events in the future.

The DSL & DDSL (See Appendix 3)

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the College. The DSL's responsibility is to maintain an overview of safeguarding within the College, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the College's policies and procedures in practice.

In line with our commitment to **'Working Together to Safeguard Children'** the DSL/DDSL will liaise, as appropriate, with the three safeguarding partners (local authority, chief officers of policy and clinical commissioning groups). Reference will also be made to NSPCC – When to Call the Police – (npcc.police.uk). Where a child is suffering, or likely to suffer from harm, a referral to children's social care is made in accordance with the local referral process and information will be provided to allow assessments to be made based on all available evidence to enable a contextual approach to be made to include contexts outside the home.

The DSL works with the Governors and the Head to review and update the College's Safeguarding Policy.

The DSL regularly reviews the College's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the Designated Safeguarding Lead - DSL (and/or DDSL – Deputy Designated Safeguarding Lead) will be available (during College hours) for staff in College to discuss any safeguarding concerns. Contact information for out of hours/out of term activities will be provided to activity leaders as other staff as appropriate.

Robust safeguarding cover arrangements are maintained during periods when the DSL is unavailable due to illness, absence, educational visits or leave. In most cases, the DDSL will be available as cover, but if not, all safeguarding concerns should be immediately addressed with the Head. The College maintains a separate, confidential shared email inbox for safeguarding concerns (safeguarding@abbeygatecollege.co.uk), which can be accessed by the DDSL and Executive PA when the DSL is unavailable to ensure continuity of safeguarding responsibilities. The Deputy DSL has clear delegated responsibilities, plus access to the safeguarding inbox and all safeguarding records.

The College maintains secure safeguarding communication channels to ensure concerns can be reported and actioned without delay.

The DSL will ensure that a pupil's child protection file is transferred to their new school or college should they move on within 5 days. A copy is retained by the College and the original file is posted using a secure and 'signed-for' postal service, to allow for the confirmation of receipt, separately from the main pupil file.

Safeguarding file transfers should include:

- a safeguarding summary;
- chronology of significant concerns;
- distinction between historical and current concerns;
- details of ongoing agency involvement.

The DSL will also share in advance information necessary with the new school's DSL to facilitate the continuation of support, for example those under the Channel programme or those who have a social worker.

- 1) This role will be fulfilled by an appointed appropriate member of the College Leadership Team.
- 2) The DSL should take lead responsibility for safeguarding and child protection.
- 3) The DSL will have appropriate status and authority within the College to carry out the duties of the post.
- 4) Time, funding, resources and support will be provided to the DSL to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings and/or to support other staff to do so – and to contribute to the assessment of children.
- 5) The DSL will understand the importance of information sharing, both within school, with LSPs, other agencies, organisations and practitioners.
- 6) Record keeping will be in accordance with the College's data handling policies.
- 7) A Deputy Designated Safeguarding Lead will be appointed to support.
- 8) Whilst the activities of the designated safeguarding lead can be delegated to the deputy, the ultimate lead responsibility for child protection, as set out above, remains with the Designated Safeguarding Lead.

The DSL is expected to:

- 1) refer cases of suspected abuse to the local authority children's social care
- 2) support staff who make referrals to local authority children's social care
- 3) refer cases to Prevent where there is a concern about radicalisation
- 4) refer cases where a person is dismissed or left due to risk/harm to a child to the DBS as required and
- 5) refer cases where a crime may have been committed to the Police as required.

The DSL will liaise with the Head to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations:

- 1) as required, liaise with the 'case manager' and the LADO where cases concern a staff member
- 2) act as a source of support, advice and expertise for staff.
- 3) attend Governors Safeguarding Committee.
- 4) attend update meetings of SCP.

The DSL will undergo training to ensure the knowledge and skills required to carry out the role are refreshed and updated as required. Advanced training should be updated at least every two years. The DSL should undertake Prevent awareness training and Operation Encompass Key Adult Training. In addition to formal training, the DSL will ensure that knowledge and skills are updated and refreshed at least annually so they:

- 1) Understand the assessment process for providing early help and intervention.
- 2) Have a knowledge of how local authorities conduct a child protection case conference and attend and contribute if required to do so.
- 3) Ensure that all members of staff have access to and an understanding of the College's policy and procedures for safeguarding pupils.
- 4) Understand the relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- 5) Understand the importance of sharing information with relevant agencies.
- 6) Understand and support College with regards to requirements of Prevent Duty.
- 7) Understand the unique risks associated with online safety and requirements to keep children safe whilst they are online at College.
- 8) Are alert to specific needs of children with SEN and disabilities (SEND), those with special educational needs and young carers.
- 9) Are able to keep detailed, accurate, secure written records of concerns and referrals and are able to support staff in the protection of children.
- 10) Obtain access to resources and attend any relevant or refresher training course.
- 11) Encourage a culture of listening to children and taking account of their wishes and feelings.

The DSL should:

- 1) Ensure that the Safeguarding Policy is known, understood and used appropriately within College.
- 2) Ensure that the Safeguarding Policy is reviewed annually and to work with the Nominated Safeguarding Governor to make appropriate amendments.
- 3) Ensure that the Safeguarding Policy is available to parents and that parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this.
- 4) Link with the safeguarding partner agencies to ensure staff are aware of any training opportunities and the latest local policies.
- 5) Help to promote educational outcomes by sharing relevant information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, have experienced, with teachers and leaders.
- 6) Transfer child protection files to new schools or Colleges within 5 days. In addition to the child protection file, the DSL should also consider sharing appropriate

information with new school or college in advance of a child leaving if this will allow a new setting to continue to support victims of abuse.

The DDSL is trained to the same advanced level as the DSL and has the understanding and skills to enable them to take a leading role in the absence of the DSL.

Deputy Designated Safeguarding Lead is expected to support the DSL and lead in the absence of the DSL in the following areas:

- 1) Act as a champion of the school's safeguarding policy and procedures by supporting all staff to have access to and understand them.
- 2) Contribute to the school safeguarding policy and review process.
- 3) Understand the policy and procedures in relation to record keeping.
- 4) Ensure that relevant, detailed and accurate written records of referrals/concerns are kept and that these are shared with the head teacher and DSL and are stored securely.
- 5) Maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.
- 6) Recognise how to identify signs of abuse and understand when and how to make a referral.
- 7) Respond appropriately and promptly to disclosures or concerns relating to the well-being of a child.
- 8) Refer allegations or cases of suspected abuse to the relevant investigating agencies, ensuring they have access to the most relevant up to date information.
- 9) Multi Agency working - When the DSL is unavailable attend and contribute effectively to Child In Need meetings, Child Protection conferences, Early Help, and planning and review meetings.
- 10) The DDSL will
 - 1) liaise with the DSL to inform him/her of issues.
 - 2) act as a source of support, advice and expertise for staff.
 - 3) attend Governors Safeguarding Committee meetings.
 - 4) attend update meetings of SCP.
- 11) The DDSL will undergo training to ensure the knowledge and skills required to carry out the role. Advanced training should be updated at least every two years. The DDSL should also undertake Prevent awareness training.
- 12) In addition to formal training, the DDSL will
 - 1) ensure that knowledge and skills are updated and refreshed at least annually.
 - 2) contribute to safeguarding training of others as appropriate.

Roles & Responsibilities (2) – Data Management, Alternative Providers, Fostering & Hosting

All safeguarding concerns, discussions and decisions made are recorded in writing on the iSAMS Wellbeing Manager database or within confidential, securely stored filing system in a separate child protection file. Records include a summary of the concern; details of follow up actions and outcomes.

Safeguarding and the Data Protection Act 2018 – GDPR: Information that is held for safeguarding purposes, including information which is sensitive and personal, should be treated as ‘special category personal data’. Safeguarding of children and individuals at risk is a processing condition that allows practitioners to share special category personal data. This includes allowing the sharing of information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner.

The Data Protection Act 2018 and 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 and promote the welfare and protect the safety of children.

Alternative Providers and Contractors: When using alternative providers, the College continues to be responsible for the safeguarding of pupils and will be satisfied that the provider meets the needs of the pupil. College will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

Elective Home Education: Where a parent/carer has expressed their intention to remove a child from school with a view to home education, a meeting should be coordinated with key professionals and parents/carers to consider the best interests of the child. College will inform the Local Authority of all deletions from the admissions register when a child is taken off roll into Elective Home Education.

Work Experience: The College’s Careers provider, Mploy, ensures that all relevant policies, safeguarding checks and procedures are in place to protect children from harm by carrying out pre-placement visits and checks.

Private Fostering: Staff should be alert to, and, when it comes to their attention report, to the local authority, information that suggests that a child is being privately fostered. This occurs when a child, under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a close relative in their own home for more than 28 days.

Host Families: can be used to accommodate children on sports or language exchanges however, this is no usual practice at Abbey Gate College. When the arrangements are made directly between two families which accept responsibility, this can be considered to be a personal arrangement and outside the scope of regulated activity. However, where the family is paid, the arrangement to accommodate a child is not made by the child’s family, or the school has the power to terminate the arrangement, it is unlikely to be a personal arrangement and could constitute a regulated activity and so a DBS check, including barred list information, is obtained in respect of the responsible adult(s) and suitable records kept.

Where children are being hosted in homestays arranged by another school in the UK, the hosting school will be responsible for completing appropriate vetting checks. Such checks are not available for overseas visits however there will be close work with the partner school to ensure that appropriate assurances are obtained before a visit takes place.

Roles & Responsibilities (3) – Training

All staff (including the Head) will be provided with copies of documentation below and induction training that includes:

- 1) The Safeguarding policy – including information about the identity and role of the DSL and DDSL.
- 2) The Staff Code of Conduct
- 3) A copy of Part 1 of KCSIE
- 4) All staff will be required to read and sign to confirm they have done so – KCSIE 2024, Part 1.
- 5) The Online Safety Policy.
- 6) The ICT acceptable user policy
- 7) Smart Technology Policy
- 8) Whistleblowing policy
- 9) Health and safety Manual
- 10) Behaviour Policy
- 11) Anti-Bullying Policy
- 12) Wellbeing and Mental Health Policy
- 13) Where relevant – Completion of Disqualification by Association declaration.
- 14) Help in understanding roles and responsibilities
- 15) Information about emergency evacuation procedures

Staff are also required to:

- 1) Receive training in safeguarding and child protection regularly in line with advice from Cheshire West and Chester Board. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- 2) Updates to safeguarding training will include online safety.
- 3) Undertake regular informal updates, at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively. The College provides these via staff meetings, emails and online training.

Authorised and approved on behalf of the Board of Governors by:



Mr Gareth Lee - Chair of the Board
September 2026

APPENDIX 1 – Key Safeguarding Contact Information

Role	Name	Number	Email address
Designated Safeguarding Lead (DSL)	Carole Houghton	01244 332077	houghton_c@abbeygatecollege.co.uk
Deputy Designated Safeguarding Lead (DDSL) based at I&J School	Corinna Travis	01244 569280	travis_c@abbeygatecollege.co.uk
Governor with Safeguarding Responsibility	Vanessa Brodie	01244 332077	Vanessa.brodie@abbeygatecollege.co.uk

APPENDIX 2 – Safeguarding Children Partnership Contact Information

EMERGENCY NUMBERS		
POLICE	Cheshire Police	0845 458 0000 (999 in an emergency)
SOCIAL SERVICES	- i-ART (Integrated Access and Referral Team) Wyvern House Winsford Cheshire CW7 1AU	Office hours: 0300 123 7047 7) 8.30am – 5pm (Monday – Thursday) 8) 8.30am – 4.30pm (Friday) Out of hours: 01244 977 277 Emergency Duty Team (EDT) 4.30pm – 8.30am (Monday – Thursday) - From 4pm (Friday) 24 hours' weekends and bank holidays Email: iART@cheshirewestandchester.gov.uk

NON-EMERGENCY NUMBERS	
Cheshire West and Cheshire – Safeguarding Children in Education Team – SCIE SCIE Team 2nd Floor, Civic Way Ellesmere Port CH65 0BE	Tel: 0152 356 6843
Cheshire West and Chester Safeguarding Children Partnership Civic Way Ellesmere Port Cheshire Shared Services CH65 0BE	SCP@cheshirewestandchester.gov.uk
Allegations Management: Local Authority Designated Officer (LADO)	Referral process: SCP@cheshirewestandchester.gov.uk www.safeguardinglado@cheshirewestandchester.gov.uk
Cheshire Police:	0845 458 0000 (999 in an emergency)

APPENDIX 3 – Contact Information For National Organisations

Department for Education	Non-Emergency Number: 020 7340 7264
NSPCC Whistleblowing Advice Line Weston House 42 Curtain Road London EC2A 3NH	Tel: 0800 028 0285 Email: help@NSPCC.org.uk
Disclosure and Barring Service PO Box 181 Darlington DL1 9FA	Tel: 01325 953795 Email: dbsdspatch@db.s.gsi.gov.uk
Teaching Regulation Agency Ground Floor South Cheylesmore House Quinton Road Coventry CV1 2WT	Tel: 02075935393 Email: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	Mon – Fri: 8am to 6pm Tel: 0300 123 4666 Email: Whistleblowing@ofsted.gov.uk

APPENDIX 3

Annex B KCSIE 2026 **Role of the Designated Safeguarding Lead**

Role of the designated safeguarding lead Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description. The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or a deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or 'Teams' or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities. The College also maintains a separate, confidential shared email inbox for safeguarding concerns (safeguarding@abbeygatecollege.co.uk), which can be accessed by the DDSL and Executive PA when the DSL is unavailable to ensure continuity of safeguarding responsibilities,

Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care

- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school or college. This includes:
 - ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and

- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should 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 and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice set out in Parts one and two of this guidance.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. It should contain information as detailed in Roles and Responsibilities 1. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named person with oversight for SEND in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part-time staff
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this

- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff

Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should also undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college

- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners

- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc

APPENDIX 4 – Useful Websites

Cheshire West and Chester Local Safeguarding Children Board:
www.cheshirewestscb.org.uk

Government publications: www.gov.uk

Child Exploitation Online Protection Centre: www.ceop.gov.uk

Childline: www.childline.org.uk

NSPCC: www.nspcc.org.uk

Young Minds: www.youngminds.org.uk

APPENDIX 5 – Leadership & Management Safeguarding Training

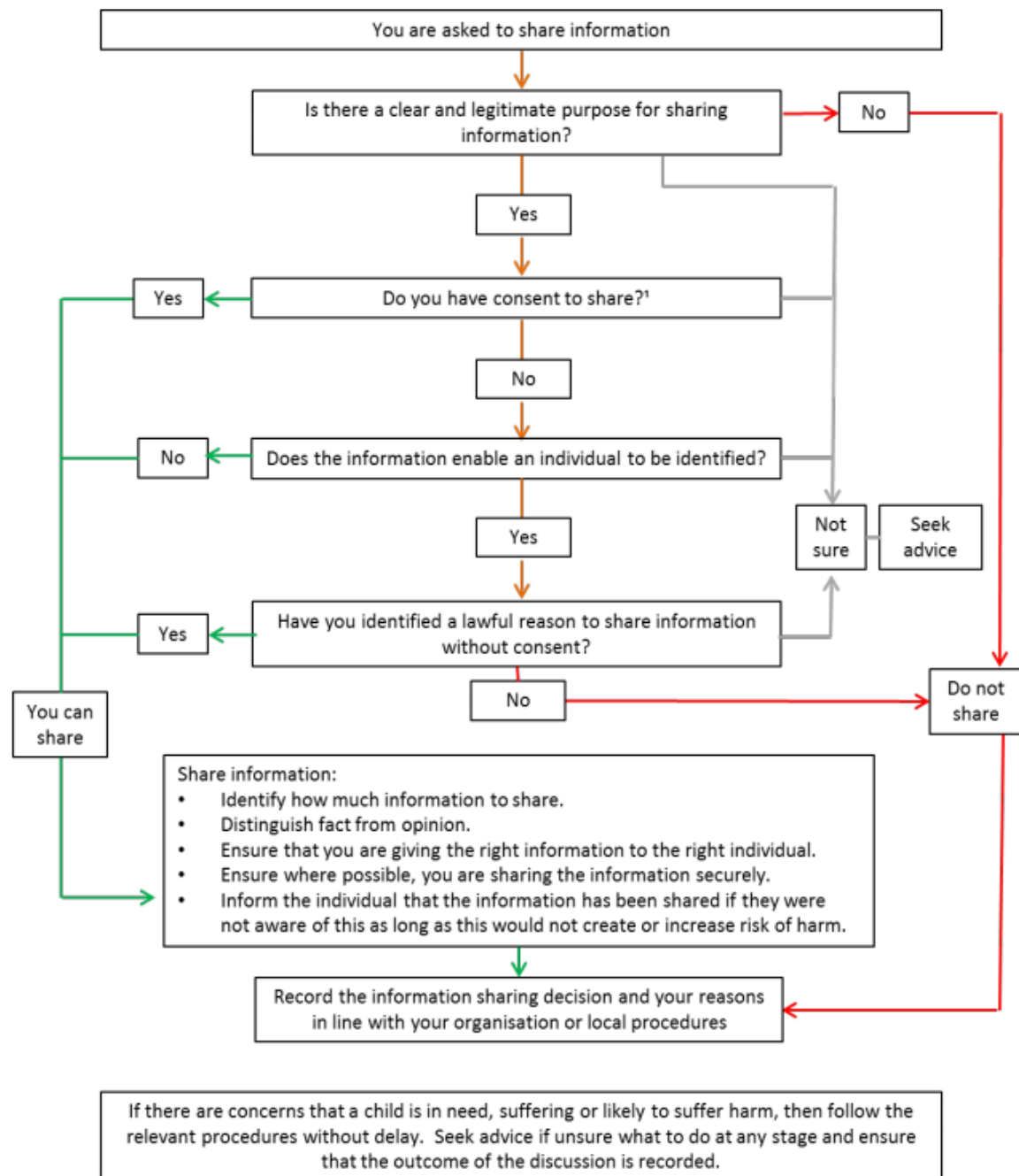
NAME	ROLE	TRAINING RECEIVED	TRAINING DUE
Carole Houghton	Deputy Head (Pastoral) DSL	Level 3 – July 2026	July 2028
Corinna Travis	Deputy Head of I&J – DDSL & EYFS	Level 3 – January 2025	January 2027
Vanessa Brodie	Lead Governor	AGC – September 2022 National College – August 2024	August 2027
Craig Jenkinson	Head	Level 3 – July 2023	July 2026
Amanda Williams	EYFS Co-ordinator	Level 3 – January 2024	January 2027

Safer Recruitment - Safeguarding Training

NAME	ROLE	TRAINING RECEIVED
Sue Moran	Human Resources and Staff Wellbeing Manager	15 January 2025
Craig Jenkinson	Head	9 March 2023
Carole Houghton	Deputy Head (Pastoral) DSL	6 February 2026
Vanessa Brodie	Chair of Safeguarding Committee (Governor)	8 July 2023
Mike Booth	Deputy Head (Academic)	10 March 2025
Andy Austen	Senior Deputy Head	23 December 2025
Corinna Travis	Deputy Head, IJS DDSL	22 November 2024
James Brown	Chair of Finance Committee (Governor)	26 May 2023

APPENDIX 6 – Flowchart Of When and How to Share Information

Flowchart of when and how to share information



1. Consent must be unambiguous, freely given and may be withdrawn at any time

APPENDIX 7 – Risk Assessment Form for Volunteers



Abbey Gate College

Risk Assessment Form for volunteers

Name of volunteer:		Position applied for:
Questions	Considerations	
Will the volunteer be undertaking regulated activity? i.e. is the work: • unsupervised; • undertaken once a week, three or more times in a 30 day period or overnight; and • provides the opportunity for contact with children	Yes / No. <i>If Yes, a DBS check and Children's Barred List check must be completed before the individual undertakes any activity with children.</i> <i>If no, see the section below on volunteers who will not be undertaking regulated activity.</i>	
Has the volunteer completed a Childcare Disqualification Self-Declaration Form? (see Recruitment, Selection and Disclosure Policy and Procedure for further information)	Yes / No / Not applicable <i>If No, the volunteer must not undertake any relevant duties for the School until a form has been completed and confirmation received by the School that they are not disqualified from working with under eights.</i> <i>If Yes, does any information disclosed on the form disqualify the volunteer from working in a relevant role with under eights?</i> <i>If Yes - the volunteer must not undertake any relevant duties for the School. Contact the volunteer to discuss.</i> <i>If No - continue with risk assessment.</i>	

If the volunteer will be undertaking regulated activity has an enhanced DBS disclosure with Children's Barred List check been requested?	Yes / No <i>If No, the volunteer must not undertake any duties for the School.</i> <i>If yes, confirm date requested.</i>
Has the original DBS disclosure certificate been received?	Yes / No <i>If No, carry out separate risk assessment to determine whether volunteer can undertake any duties for the School.</i> <i>If Yes, does it contain any criminal records information?</i> Yes / No <i>If Yes, carry out a DBS disclosure risk assessment to determine whether the disclosure is satisfactory in the opinion of the School.</i>
Is the individual barred from working with children?	Yes / No <i>If Yes, it is an offence for a barred person to work with children or to apply to work with children. The School must inform the Police and the DBS immediately. You must contact the School's Designated Safeguarding Lead.</i>
If the volunteer will not be undertaking regulated activity follow the steps below to determine whether a DBS check is necessary*	
What type of work will the volunteer be undertaking?	<i>Insert details of the work to be undertaken by the volunteer.</i>

Would the work fit the definition of regulated activity above if it was undertaken more frequently i.e. if it was carried out once a week, three times or more in a 30 day period or overnight?	Yes / No <i>If Yes, it is possible to carry out an enhanced DBS, with barred list, check.</i> <i>If No, an enhanced DBS check cannot be carried out.</i>
Has formal or informal information been obtained about the volunteer from staff, parents and other volunteers from within the School community?	Yes / No <i>If Yes insert summary details of the information obtained.</i> <i>If No, consider whether information should be sought. If information is not sought record here the reasons why not.</i>
Does the volunteer work or carry out voluntary activities elsewhere?	Yes / No <i>If Yes, has a reference been requested and is it satisfactory?</i> <i>If No, are there any other third parties from whom a reference may be obtained?</i>

Based on the above information will a DBS check be requested?	Yes / No <i>If Yes, confirm date requested.</i> <i>If No, the volunteer must not have unsupervised access to children. You must also consider the level of supervision required with reference to the statutory guidance on supervision which is reproduced below.</i> <i>the supervision must be by a fully vetted member of staff;</i> <i>the supervision must be regular and day to day; and</i> <i>the supervision must be "reasonable in all the circumstances to ensure the protection of children".</i> <i>The following factors must also be considered:</i> <i>what are the ages of the children with whom the volunteer will be working?</i> <i>how many children will the volunteer be working with?</i> <i>are other individuals helping to look after children?</i> <i>how much opportunity does the work give the volunteer for contact with children?</i> <i>how vulnerable are the children? and</i> <i>are there any other individuals being supervised by the supervising member of staff at the same time? If so, how many?</i>
Level of supervision:	<i>What level of supervision should the individual receive taking into consideration the responses to the above questions? (you must comment on how the supervision will work in practice)</i>

Assessed by	 Print name. Signature Job title	 Date assessed
Assessment approved by**	 Print name Signature Job title	 Date assessed

***Failure to conduct a risk assessment where one is required may amount to misconduct which will be dealt with in accordance with the School's disciplinary procedure.**

****Assessment must be approved by your Head of Department or the Head.**

APPENDIX 8 - Mental Health Risk Assessment Tool



Abbey Gate College

Mental Health Risk Assessment Tool

1. Student Information

- Name:
- Age:
- Year Group:
- Key Staff Contact:
- LE Status:
- Parent/Guardian Contact:

2. Reason for Assessment

	Tick as appropriate
Self-disclosure	
Staff concern	
Peer report	
Behavioural incidents	
Attendance concerns	
Referral from GP/CAMHS	

3. Mental Health Indicators (Rate 0-3)

	Rate 0-3
Persistent low mood or irritability	
Social withdrawal	
Anxiety or panic attacks	
Eating/sleeping changes	
Self-harm	
Suicidal thoughts	
Aggression towards staff/students	
Risky behaviours	
Substance misuse	

4. Risk Assessment Criteria

Risk Area	Low	Medium	High
Risk to self			
Risk to others			
Emotional/mental deterioration			
Impact on learning			
Impact on attendance			
Home/family			
Exposure to bullying/peer issues			

5. Protective Factors

	Yes/No
Supportive relationships at school	
Supportive relationships at home	
Regular engagement in co-curricular	
Regular engagement in extra-curricular	
Connection to a faith or cultural group	
Willingness to engage in support	

6. Action Plan

- Immediate actions (e.g., parental contact, CAMHS referral):
- Designated staff member to monitor:
- Support in school (e.g., counselling, mentoring, safe space):
- Review date:

7. Consent and Confidentiality

	Yes/No
Consent obtained from parents	
Student voice included in planning	
Clear limits of confidentiality explained	

8. Signature and Date

Signature:

Print name:

Date:

APPENDIX 9 - Policy for Safeguarding Against AI Deepfake Misuse of School Website Images

1. Purpose

This document outlines the policy the College uses to protect its children from the misuse of publicly shared images, especially the creation of pornographic AI-generated deepfakes, and details how to respond in the event of threats, coercion/extortion, blackmail, or evidence of such misuse.

2. Background

Emerging AI technologies now enable the manipulation of images to produce realistic, sexually explicit "deepfakes." Publicly available photos, particularly those of children, may be exploited by malicious actors. While rare, cases of AI-fabricated child sexual abuse material (AI CSAM) are a serious safeguarding, legal, and reputational threat.

3. Image Publishing Policy

To reduce risk, the College follows the procedure below for all images published on its website, social media, or in promotional materials:

a. Consent

Written, informed parental or guardian consent is obtained before using any child's image via ISAMS parent portal and as part of the parental contract. All opt-outs are respected and an up-to-date image consent register is maintained.

b. Image Selection Guidelines

Care should be taken when taking digital / video images for potential posting on social media, website, or other digital publications that they:

- DO consider if you need to use an image of children
- DO NOT show an individual child's face in full, frontal profile (such as may easily be cut and pasted elsewhere)
- DO show children from behind, in groupings, in side profile, or partially obscured (such that any individual cut/paste would be notably difficult)
- DO consider potential safeguarding implications, before taking the shot (for example, young people in tracksuits or similar, rather than revealing kit - for both male and female)
- NEVER include names, class details, or location metadata alongside images.
- DO NOT reveal current location on social media posts

c. Anonymisation

The College may consider the use of AI-based anonymisation tools for realistic face replacement or subtle facial obfuscation.

Harsh censorship (e.g., black boxes) which draws attention is avoided.

4. Technical and Access Controls

The College will:

a. Website Security

- Disable right-click image downloads and block image hotlinking where feasible.
 - Use secure servers with up-to-date security patches and SSL certificates.
- b. Image Metadata
- Remove all EXIF data (location, camera details, etc.) before uploading images.
- c. Audit and Monitoring
- Regularly audit web content to assess image use and flag potential vulnerabilities.
- d. Other considerations
- Avoid the proliferation of College social media accounts (sports teams, houses, etc.) run by a variety of people that make them difficult to monitor and control.
 - Where possible ensure all accounts have privacy settings to exclude anyone not authorised by the College.

5. Threat Response Procedure (Blackmail, coercion/extortion, Deepfake Threats, or Misuse)

If the College receives a threat or learns of the misuse of student images for deepfakes or blackmail it will:

a. Immediate Actions

- Not engage with the blackmailer.
- Take expert legal advice on how to proceed.
- Secure all relevant evidence (emails, URLs, screenshots).
- Remove any related images from the website or social channels immediately.
- Notify the Designated Safeguarding Lead (DSL) and Headteacher.

b. Escalation

- Contact (via the DSL):
 - o Police (use 999 if the child is at immediate risk or 101 for reporting).
 - o Consider informing Local Authority Designated Officer (LADO).
 - o National Crime Agency's CEOP Command (if the content is exploitative).
- Inform parents/guardians of the affected child sensitively and promptly.

c. Support

- Provide the student and family with access to counselling and digital wellbeing support
- Work with external cybercrime units if removal from external platforms is needed. The National Cyber Crime Unit (NCCU) is part of the National Crime Agency (NCA) or some regional forces have Regional Organised Crime Units with dedicated cyber teams.

6. Staff Training and Awareness

All staff receive annual training on digital safeguarding and image use.

The College's DSL, Marketing and IT staff receive specific training in image anonymisation, AI threats, and online harm detection.

7. Further guidance for additional protections is available in Appendix 10 – UK Online Harms Early Warning Working Group – Protecting your settings images from AI manipulation and abuse.

8. Policy Review

This policy will be reviewed annually, or sooner if new technologies or threats emerge.

Appendices:

- A. List of Anonymisation Tools
- B. Contact Info for Law Enforcement and Safeguarding Bodies

Appendix A – List of Anonymisation Tools

DeepPrivacy 2 https://github.com/hukkelas/deep_privacy2?tab=readme-ov-file

Open-source AI Replace faces with synthetic alternatives

Facepixelizer Web-based tool Auto pixelates faces Free Good for quick edits

<https://facepixelizer.com/index.html>

Photoshop Neural Filters <https://www.adobe.com/uk/products/photoshop/neural-filter.html>

Commercial desktop app Morph or obscure faces realistically

Adobe CC Highly customizable anonymization

ClearFace AI <https://starryai.com/app/user/RiaCarrma/creation/136563244>

SaaS Face blurring/replacement, compliance Subscription Used in journalism and education sectors

AnonFace <https://github.com/StealUrKill/anonfaces> Web API Realistic AI face swaps

Appendix B – Key Safeguarding and Law Enforcement Contacts

Designated Safeguarding Lead (DSL) - Carole Houghton

carole.houghton@abbeygatecollege.co.uk Contact no: 01244 332077

CWAC Local Authority Designated Officer (LADO) Concerns involving staff or serious safeguarding safeguardinglado@cheshirewestandchester.gov.uk

Police – Non-Emergency Report cybercrime or image misuse Call 101 or use www.police.uk

CEOP (Child Exploitation and Online Protection) Report grooming, blackmail, or (AI)

CSAM www.ceop.police.uk

National Crime Agency (NCA) National-level threat response

www.nationalcrimeagency.gov.uk

Internet Watch Foundation (IWF) Report and remove child sexual abuse images www.iwf.org.uk

Appendix 10 – UK Online Harms Early Warning Working Group – Protecting your settings images from AI manipulation and abuse.

Protecting your setting's images from AI manipulation and abuse:

Guidance for education settings and organisations working with children and young people

Developed by the UK Online Harms Early Warning Working Group, this guidance shares best practice and considerations for education settings and organisations working with children and young people on the use of photos and videos of children and young people across their online platforms, to address the risk of AI image manipulation.

Practices to protect young people's images

This document looks at the responsible management, sharing and protection of photographs and videos, particularly those featuring children and young people. This includes images used across education settings' websites, social media platforms and other digital spaces. When thinking about how to best protect children and young people's images online, schools and education settings may wish to think about image security practices such as:

- ☐ **Ensuring images do not contain identifiable information** that could be used to harm or blackmail an individual (e.g. full names or faces).
- ☐ **Using imagery that is harder to misuse or abuse**, this could be by only sharing photos taken from a distance, blurred images or images taken from over the shoulder.
- ☐ **Applying privacy settings** to help limit who can view and share content (this can be done on social media or any other place the images are stored or shared).
- ☐ **Removing metadata** (e.g. EXIF data) from the images that may reveal location, device details or timestamps. Such data can unintentionally reveal schedules or routines, for example of regular training
- ☐ **Embedding image security awareness and practices** in staff training and policies.

What are the risks?

Ensuring images of children and young people are protected is not only about compliance or reputation but, most importantly, safeguarding. The duty to safeguard children and young people includes online spaces.

Risks associated with poor image security may include:

- **Misuse or abuse of images:** images of children and young people may be taken from education settings' websites or online platforms, for example via [web-scraping](#). These images may be misused, shared without consent or manipulated to create further imagery of children and young people, including the use of AI tools such as nudification apps to create child sexual abuse material ([AI CSAM](#)).
- **Vulnerability to blackmail:** misuse or abuse of images, particularly AI CSAM, may be used to blackmail education settings or individuals to pay money against the threat of sharing of these images. Images of children and young people (or staff) may be vulnerable to this type of blackmail.
- **Safeguarding concerns:** the potential misuse, abuse or sharing of images of children and young people without consent can lead to safeguarding concerns, for example, Looked After Children. This may include vulnerability to online blackmail or putting children and young people at risk of harm by exposing personal information or location data.
- **Privacy breaches:** loss of control of metadata that exposes sensitive information can lead to data and privacy breaches.

Why is this important?

Putting in place image security measures and carefully considering how and what imagery of children and young people is used is important for a number of reasons, including:

- **Safeguarding children and young people:** safeguarding should be the highest priority for education settings when using children and young people's imagery. Advancements in online technology create new vulnerabilities and capabilities that can lead to children and young people's images being misused, shared without consent or exposing personal data. It's important that education settings understand these risks and put a safeguarding-first approach in place to protect children and young people.
- **Building trust:** putting measures in place to protect student image security demonstrates a commitment to privacy, safeguarding and responsible digital practices. It can build greater trust with children, young people, parents, carers, governors and inspectors.
- **Celebrating achievements more safely:** image security is important to ensure education settings are able to showcase their environment, student life and achievements while minimising risks.
- **Compliance:** image security supports alignment and compliance with data protection legislation and local authority policies.

Checklist of actions to consider

Staff training and response:

- ☐ All staff should be trained to recognise and respond to incidents of image-based abuse (e.g. non-consensual sharing, manipulation or threats involving student imagery) with emphasis on prevention and safe practice.
- ☐ Ensure any immediate safeguarding response prioritises the student's safety, dignity and emotional wellbeing.
- ☐ Report any blackmail or threats involving imagery to the police as a criminal matter, alongside following internal safeguarding procedures.

Parental consent:

- ☐ Provide parents, carers and young people with clear information about the potential risks of image use, including the online misuse and manipulation of digital content, and the steps your setting is taking to mitigate this.
- ☐ Review and re-sign consent forms for photographs and videos regularly (e.g. annually or at key transition points) to ensure ongoing awareness and agreement.
- ☐ As best practice, children and young people should give their own consent in addition to parental/carers consent, recognising their growing autonomy and rights, if they are old enough and have the capacity to make their own decisions.
- ☐ Ensure consent forms are fully accessible, with opportunities for questions and withdrawal at any time.

Content renewal and audits:

- ☐ Schedule regular, documented audits of children and young people's imagery (e.g. termly or biannual) on websites, social media and promotional materials.
- ☐ Ensure any out of date images are updated or removed where necessary to minimise risk, and that this process aligns with current consent and safeguarding guidance.
- ☐ Update policy and practice guidance to ensure good digital practices in relation to data minimisation and storage limitation obligations. You should only retain personal data for as long as necessary and limit the amount of data collected, including student imagery

Key question to consider: Are images of children and young people needed?

To protect your setting, staff, and young people, consider whether children and young people's images are required at all, or whether using imagery without children and young people's faces can still achieve your objectives (e.g. showcasing your setting).

If you are using images of children and young people, you should also consider the following:

- ☐ Replacing images that directly show a student face-on, using alternative angles that minimise identifiable features.
- ☐ Avoid names or full names.
- ☐ Limit public visibility of student images (e.g. closed groups rather than open platforms).
- ☐ Ensure all image metadata is stripped before publication.
- ☐ Use lower resolution images to reduce risk of misuse.
- ☐ Share clear information with parents and carers about potential risks and the processes in place to protect student imagery.
- ☐ Embed image security into policy and procedure, making it a standing requirement across safeguarding, communications and IT practices.
- ☐ Consider protective software solutions (e.g. watermarking, metadata scrubbing or "immunisation" tools) to reduce the risk of unauthorised alteration or misuse of student imagery.
- ☐ Replace images of any children or young people who are no longer members of the school community.

What to do if images of young people are misused, altered or abused

If an incident occurs, it is important to take the following steps:

Contain & Escalate

- ☐ Do not delete or further share any communication or criminal images relating to the incident. Retain and store securely and seek advice from your local police force.
- ☐ Immediately ensure the original version of the compromised images are no longer publicly available, including on websites or social media.
- ☐ Notify your school or organisation's Designated Safeguarding Lead/Person or a senior colleague.
- ☐ Record details of the breach in line with your standard incident reporting processes, including carrying out a risk assessment of the impact on individuals and taking any notification actions as required.
- ☐ If you have been approached with demands by someone attempting to blackmail your setting, it is important that you do not engage with the individual or respond to any of the demands. The paying of ransom can be illegal in certain circumstances.

Report

- ☐ **Police:** Report to your local police force if you have received threats to publish sexual imagery of children or young people in your educational setting. The creation of child sexual abuse material is illegal regardless of whether it is AI-generated or not. If a young person is at immediate risk of significant harm, call 999.
- ☐ **Report Remove (Childline/IWF):** Support under-18s to use the confidential 'Report Remove' tool to report sexual images or videos of themselves, including if they are created by AI, to see if they can be removed from the internet.
- ☐ **Take It Down:** An image take down service, including for AI-generated images, offered by the National Center for Missing and Exploited Children (NCMEC).
- ☐ **Stop NCII:** Use 'Stop NCII' for the removal of non-consensual intimate images of over-18s, whether pupils or staff, including if these images are generated by AI.

Platform reporting

- ☐ Request removal from hosting sites/social media where the images have been shared.

Support

- ☐ Prioritise student safety and wellbeing.
- ☐ Inform parents and carers with clear next steps.
- ☐ Exposure to illegal material involving children, and responding to concerns while supporting affected families, can be extremely distressing for the staff involved. It is therefore important that affected staff are made aware of the wellbeing support available to them through their employment or external helplines. Professionals, parents and carers can also seek support and advice via the [Stop It Now helpline](#) or the [Professionals Online Safety Helpline](#).

Prevent Recurrence

- ☐ Audit imagery on school websites/platforms and tighten consent processes.
- ☐ Update policies and staff training.
- ☐ Consider protective software (e.g. watermarking, metadata scrubbing).

What to do if someone over 18 is targeted

Some young people will be over 18 whilst still at school or college and it is important that they are made aware of the support tools that they can use. Staff can be targeted and are also able to make use of these reporting routes and support services.

Anyone 18 or over who is being threatened with the release of their intimate images can contact [Stop NCII](#) and [the Revenge Porn Helpline](#).

Guidance for higher education professionals can be found here: [FMSE HE 18+ guidance and poster](#)

Helpful guides and tools

- [Guide to removing EXIF metadata](#) - A guide created by the early warning working group.
- [Hwb: Practices and principles for schools' use of social media](#) - A guide to support schools and education settings in the safe and responsible use of social media.
- ICO: [Data sharing code of practice](#) - Practical steps that individuals, businesses and organisations need to take to share data while protecting people's privacy
- ICO: [A guide to data security](#) - Guidance on how organisations should approach data security under UK GDPR, outlining practical steps to protect personal data.
- [Internet Watch Foundation](#) - Anonymously report suspected child sexual abuse images or videos.
- [IWF and NCA CEOP Education guidance: Understanding and responding to AI-generated child sexual abuse material](#) - Information for all professionals working with children and young people.
- [Marie Collins Foundation: Supporting children impacted by image abuse](#) - a free resource that addresses some of the recovery needs of a child harmed by Technology-Assisted Child Sexual Abuse.
- [Professionals Online Safety Helpline](#) - Supporting professionals working with children and young people, with any online safety issue they may be having.
- [Report Remove](#) - Helping young people under 18 in the UK to confidentially report sexual images and videos of themselves and remove them from the internet.
- [Risk assessment template](#) - An example risk management template which setting can adapt to meet local need.
- [SBNI Online Safety Hub AI misuse guidance: Northern Ireland](#) - Explaining how AI can be misused, and highlights the key safeguarding concerns that parents, carers and professionals should be aware of.
- [Sharing nudes and semi nudes guidance: England](#) - This advice outlines how organisation in England should respond to an incident of nudes and semi-nudes being shared.
- [Sharing nudes and semi nudes guidance: Wales](#) - This advice outlines how organisation in Wales should respond to an incident of nudes and semi-nudes being shared.
- [SWGfL: Online Safety Policy template](#) - A template which allows schools to create an online safety policy that is relevant to their setting.
- [SWGfL: Social Media checklists](#) - Providing simple, practical guidance to help you navigate the safety and privacy features of popular platforms.
- [Take It Down](#) - A service for young people to help remove online nude, partially

- nude, or sexually explicit photos and videos taken before they were 18.
- [Taking photographs: data protection advice for schools](#) - Guidance from the Information Commissioner's Office.
 - [UKCIS: How to respond to an incident \(Overview\)](#) - Advice for education settings working with children and young people

About the UK Online Harms Early Warning Working Group

This guidance has been drafted and supported by the following UK Online Harms Early Warning Working Group members:

- Childnet
- Education Scotland
- Embrace (Child Victims of Crime)
- Internet Watch Foundation
- Lucy Faithfull Foundation
- Marie Collins Foundation
- National Crime Agency - CEOP Education
- NSPCC
- Safeguarding Board for Northern Ireland
- Samaritans
- SWGfL
- Tell MAMA
- The Children's Society
- Welsh Government

The UK Online Harms Early Warning Working group is designed to develop early information-sharing between helplines, hotlines, government, law enforcement, and reporting bodies to better identify issues or new trends relating to online harms at an early stage.

