Compass Eko Trust

Child protection and Safeguarding 2026

Monitoring, evaluation and review

The Board of Trustees will assess the implementation and effectiveness of this policy. The policy will be promoted and implemented throughout all Trust schools.

This Policy will be reviewed by the Board of Trustees on an Annual cycle.

Adherence to the policy will be monitored by the Local School's Committee.

Policy adopted:	Summer Term 2026
Aligned for **adaption at school level**	School Name
Other related policies/ guidance:	○ Staff code of conduct ○ behaviour and relationships policy ○ online safety policy ○ acceptable use policy ○ intimate care policy ○ Prevent policy ○ whistleblowing policy ○ looked after children policy ○ children missing education procedures ○ filtering and monitoring standards ○ AI policy ○ Personal devices policy ○ Attendance policy ○ Anti-bullying policy ○ Supporting Children with Medical Needs ○ Equalities policy ○ Whistleblowing ○ Safer Recruitment ○ Sex and Relationships Education Policy (SRE) ○ Health and Safety
Additional guidance	○ Keeping Children Safe in Education ○ Working together to safeguard Children ○ Plan technology for your school, digital and technology standards, ○ Cyber Security Standards for Schools and Colleges ○ Curriculum guidance ○ The Children Act 1989 ○ The Children Act 2004 ○ The Education Act 2002 (Section 175) ○ The Children and Families Act 2014 ○ What to do if you are worried a child is being abused ○ Information Sharing: Advice for Practitioners

	○ Sexual violence and sexual harassment between children in schools and colleges ○ Searching, Screening and Confiscation Advice ○ Children Missing Education ○ Designated Teacher for Looked-After and Previously Looked-After Children ○ Keeping Children Safe in Out-of-School Settings ○ Filtering and Monitoring Standards for Schools and Colleges ○ Guidance on online safety, including risks associated with social media, mobile devices, and emerging technologies ○ **Local Safeguarding Arrangements**
Next Review:	Summer Term 2027

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1. Key details

To be personalised at school level:

Name of Headteacher:	
Name of Designated Safeguarding Lead for Child Protection: **Out of hours contact details:**	
Name(s) of Deputy Designated Safeguarding Leads for Child Protection:	
Name of Designated Teacher for Looked-after Children:	
Name of person in charge of online Safety	
Name of Governor / Local school committee for Safeguarding/Child Protection:	
Name of Chair of Governors:	
Name and contact details of LADO:	
Name and contact details of Local safeguarding Officer:	
Trust Lead for Safeguarding:	Holly Gibson – hgibson@compasseko.uk
Named Trustee Responsible for Safeguarding:	Nathalie Fitzgerald - nfitzgerald@compassps.uk
Named Trustee Responsible for Whistleblowing	Susan Skidmore – sskidmore@compassps.uk
CEOs	John Camp – Jcamp@compasseko.uk Rebekah Iiyambo - riiyambo@compasseko.uk

2. Child Protection Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children and to work collaboratively with partner agencies to ensure children receive the right help at the right time.

We endeavour to provide a safe, inclusive, and welcoming environment where children and adults feel respected, valued, and able to be themselves. We maintain an attitude of **'it could happen here'** where safeguarding is concerned and promote a strong safeguarding culture in which children are encouraged to talk, are listened to, and know that their concerns will be taken seriously and acted upon.

This policy provides staff, volunteers, governors, and trustees with a clear and consistent framework to safeguard and promote the welfare of children, ensuring that all adults understand their roles and responsibilities. It also sets out how we will work with parents and carers, and partner agencies, to safeguard children in our care.

This policy takes into account locally agreed multi-agency safeguarding arrangements and reflects the expectations set out in statutory guidance, including Keeping Children Safe in Education (KCSIE 2026), alongside Working Together to Safeguard Children.

In line with updated guidance, this policy recognises the increasing importance of early help, information sharing and multi-agency working, as well as the impact of evolving technology. It specifically acknowledges safeguarding risks associated with online activity and the use of mobile devices, and wearable technologies, including risks such as exploitation, coercion, cyberbullying, and covert recording.

The policy provides clear information about the different forms of abuse and exploitation, links to statutory guidance, and outlines the procedures we follow to ensure that all children receive effective support, protection and, where necessary, appropriate intervention.

3. Equality Statement

We recognise that some children have an increased risk or vulnerability to abuse, neglect, and exploitation, and that additional barriers may exist which can affect their ability to recognise, disclose or seek help. We are committed to anti-discriminatory and inclusive practice and recognise the diverse circumstances of children and families.

We ensure that all children receive equal protection, support, and opportunity, regardless of their background, identity, or individual needs. Safeguarding responses will be child-centred, proportionate, and responsive, recognising that vulnerabilities may overlap and change over time.

In line with current safeguarding guidance, we acknowledge that vulnerability can be shaped by a child's lived experience, including their environment, relationships, online activity, and access to technology. We therefore take account of contextual safeguarding risks, including those arising outside the home and in digital spaces.

We give particular consideration to children who may be more vulnerable, including those who:

- Have special educational needs and/or disabilities (SEND), or specific health conditions
- Are young carers
- Are missing from education, home, or care, including those at risk of becoming missing
- Have parents/carers who have expressed an intention to electively home educate
- May experience discrimination due to their race, ethnicity, culture, religion, gender identity, or sexual orientation, including those questioning their identity
- Have English as an additional language
- Are living in challenging or unstable circumstances, including temporary accommodation, poverty, substance misuse, domestic abuse, or exploitation
- Are at risk of, or experiencing, child criminal exploitation (CCE), child sexual exploitation (CSE), serious violence, forced marriage, honour-based abuse, female genital mutilation (FGM), or radicalisation
- Are asylum seekers, refugees, or at risk of modern slavery and trafficking
- Are affected by their own or a family member's mental health needs
- Are looked after, previously looked after, or privately fostered

We also recognise that children may be vulnerable to harm through online activity and the use of technology such as cyberbullying, exploitation, coercion, and the sharing or recording of harmful content.

Staff will be particularly mindful that children with additional vulnerabilities may face greater challenges in communicating abuse or may be disproportionately targeted, including in online environments.

Through our safeguarding practice, we ensure that all children are supported to have their voices heard, and that barriers to disclosure are actively identified and addressed.

4. Introduction

The procedures within this policy apply to all staff, volunteers, governors and trustees and form part of a whole-school approach to safeguarding. They are consistent with locally agreed multi-agency safeguarding arrangements established by the safeguarding partners (local authority, health, and police).

We take seriously our responsibility to safeguard and promote the welfare of all children. This policy has been developed in line with statutory guidance, including **Keeping Children** Safe in Education (KCSIE) 2025 and emerging updates from Draft KCSIE 2026, alongside Working Together to Safeguard Children, which set out the responsibilities of education

providers to protect children from harm and to ensure appropriate systems are in place to support staff in understanding and fulfilling their safeguarding duties.

In line with these expectations, we ensure that effective systems, training, and a strong safeguarding culture are in place so that all staff understand their role, act promptly on concerns and work effectively with other agencies.

We recognise that safeguarding extends beyond the physical environment and includes children's experiences in their wider context, including online and within the community. Pupils are supported to understand how to stay safe, including when using technology, through a broad and balanced curriculum, including PSHE.

This includes education on the safe use of digital technology and awareness of risks associated with mobile phones, meta glasses and other wearable devices, including online exploitation, cyberbullying, misinformation and inappropriate recording or sharing of content.

5. Purpose, Aims and Principles

Compass Eko Trust fully recognises its statutory and moral responsibilities to safeguard and promote the welfare of children, including those who are in need of protection.

We are committed to ensuring that all children are safeguarded effectively through a whole-school and trust-wide approach, underpinned by a strong safeguarding culture, robust systems and effective multi-agency working.

In line with statutory guidance, including Keeping Children Safe in Education (KCSIE) 2026 and Working Together to Safeguard Children, we recognise the importance of early help, information sharing, contextual safeguarding, and the impact of evolving technologies on children's safety and wellbeing.

Aims

The aims of this policy are:

- To provide staff, volunteers, governors and trustees with the knowledge, training and clear framework required to safeguard and promote the welfare of children, ensuring they understand and fulfil their statutory responsibilities and support children to grow up in circumstances consistent with the provision of safe and effective care.
- To ensure consistent, high-quality safeguarding practice across all schools within Compass Eko Trust.
- To prevent the impairment of children's mental and physical health and development by identifying concerns early and responding appropriately.
- To demonstrate our commitment to protecting children from maltreatment, both within and outside the home, including in the community and online environments.
- To ensure that appropriate and timely action is taken to safeguard children, including providing targetted early help and support as soon as problems emerge.

- To ensure safeguarding practice reflects the risks associated with digital environments and emerging technologies, including mobile phones, meta glasses, and other wearable devices, recognising their role in potential abuse, exploitation, and harm.

Principles and Values

Our safeguarding practice is underpinned by the following principles:

- Children have a right to feel safe, secure, and protected; they cannot learn effectively unless they do.
- All children have an equal right to protection from harm and to achieve the best possible outcomes.
- Safeguarding is everyone's responsibility: all staff, volunteers, governors, and trustees have a key role in preventing harm and must act immediately on any concerns or disclosures.
- We adopt a 'child-centred' and 'contextual safeguarding' approach, recognising that risks to children may arise both within and beyond the home, including in their peer groups, communities, and online environments.
- We recognise that safeguarding risks increasingly include online harm and misuse of technology, including mobile devices and wearable technologies such as meta glasses, which may be used for exploitation, coercion, cyberbullying, or covert recording.
- We are committed to working in partnership with parents, carers, and other agencies to safeguard children and reduce risk through effective multi-agency collaboration.
- Whilst we seek to work openly with parents and carers wherever possible, we reserve the right to contact Children's Social Care or the police without prior notification where this is necessary to protect a child.

Compass Eko Trust Will:

- Ensure safer recruitment procedures are robust, compliant with statutory requirements, and promote a strong staff code of conduct.
- Ensure all staff receive appropriate safeguarding training and updates, so they are confident in identifying and responding to concerns.
- Ensure safeguarding systems, including filtering and monitoring, are in place to address risks associated with online activity and emerging technologies, including mobile phones.
- Promote a safeguarding culture where concerns are identified early, recorded accurately, and acted upon without delay.

Our Approach to Safeguarding in Practice

We recognise that, due to their daily contact with children, school staff are well placed to observe signs of abuse, neglect, and exploitation. Therefore, we will:

- Raise awareness of safeguarding issues and equip children with the knowledge and skills needed to keep themselves safe, including online safety.

- Provide education that reflects current risks, including those associated with social media, mobile devices, and wearable technologies.
- Establish and maintain an environment where children feel safe, are encouraged to talk, and are listened to.
- Ensure children know there are trusted adults they can approach if they are worried.
- Promote opportunities across the curriculum, including PSHE, for children to develop the skills they need to recognise risk and stay safe from harm.
- Ensure children understand how to stay safe in digital environments, including the risks of sharing images, live streaming, and inappropriate use of recording devices.

6. Statutory Framework and Responsibilities

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (KCSIE) and Working Together to Safeguard Children, alongside the Governance Handbook.

We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

In line with updated statutory expectations, we ensure a whole-school approach to safeguarding which includes strong leadership, effective systems and a culture of vigilance, early help and multi-agency working. Safeguarding extends to children's experiences both offline and online, including risks associated with mobile devices and other emerging technologies.

More specifically, we will:

- Ensure we have a designated senior Safeguarding / Child Protection Lead (DSL), and deputy/ies, who are appropriately trained, supported and given sufficient time and resources to carry out their roles effectively.
- Ensure the DSL takes lead responsibility for understanding and overseeing filtering and monitoring systems, including safeguarding risks related to online activity, mobile devices, and wearable technologies.
- Ensure we have a nominated governor responsible for safeguarding and child protection.
- Ensure every member of staff (including temporary staff, trainees, supply staff, and volunteers) and the governing body know the name, role and contact details of the DSL and any deputies.
- Have a robust induction process in place which includes:
    - the safeguarding and child protection policy
    - staff code of conduct
    - behaviour and relationships policy

    - attendance policy
    - the role of the DSL
- Ensure all staff and volunteers understand their responsibilities to identify, respond to, and refer concerns appropriately, and confirm that they have read, understood, and will act in accordance with the relevant parts of Keeping Children Safe in Education. This will be reviewed and reinforced at least annually and through regular safeguarding updates.
    - School based and Staff working directly with children: **KCSIE Part 1 and Annex A**
    - Staff who do not work directly with children: **KCSIE Annex A (or appropriate sections relevant to their role)**
- The Trust will take reasonable steps to ensure all staff understand the content, including through training, discussion, and safeguarding updates, rather than relying solely on written confirmation.
- Ensure staff are aware of all safeguarding systems and policies, including:
    - safeguarding and child protection policy (this policy)
    - staff code of conduct
    - behaviour and relationships policy
    - online safety policy
    - acceptable use policy
    - intimate care policy
    - Prevent policy
    - whistleblowing policy
    - looked after children policy
    - children missing education procedures
    - filtering and monitoring standards, including understanding risks linked to mobile devices and wearable technologies
- Ensure a strong safeguarding culture is embedded across the Trust, where staff feel confident to raise concerns, including those relating to online safety and emerging technologies, and where safeguarding is seen as everyone's responsibility.
- Ensure staff understand the importance of early help and are supported to:
    - identify emerging concerns
    - liaise with the DSL
    - contribute to information sharing and multi-agency working
- Ensure parents and carers understand the school's responsibilities for safeguarding and child protection, including how concerns are managed and escalated.
- Notify Children's Social Care immediately (typically on the first day of absence) where there is an unexplained absence of a child who is subject to a Child Protection Plan.
- Contact the child's social worker directly if there is an unexplained absence of a child who is looked after, in line with local protocols.
- Develop and maintain effective working relationships with partner agencies and contribute to multi-agency safeguarding arrangements, including attending and contributing to strategy discussions, case conferences, and reviews.

- Keep detailed, accurate, secure written records of all safeguarding concerns, discussions, and decisions, including the rationale for decisions taken.
- Ensure records include any relevant contextual information, including the role of online activity or the use of mobile devices, or other technologies where this is linked to safeguarding concerns.
- Have procedures in place to reassess concerns where a child's situation does not improve and escalate where necessary.
- Ensure all safeguarding records are stored securely, separately from the main pupil file, and in accordance with data protection legislation.
- Follow appropriate procedures where an allegation is made against a member of staff, volunteer, contractor, or organisation using the school premises.
- Ensure safer recruitment procedures are robust and in line with statutory guidance, including:
    - appropriate identity and DBS checks
    - verification of references
    - informing shortlisted candidates that a search via an online search engine will be carried out as part of due diligence checks to identify any safeguarding concerns

7. Safeguarding Training

All staff members will receive appropriate safeguarding and child protection training as part of their induction, which is regularly updated. In addition, all staff will receive safeguarding updates (for example via briefings, email communications, e-bulletins and staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including when pupils are online.

Training will ensure that staff not only read but understand and can apply safeguarding guidance in practice, reflecting the expectation of a strong safeguarding culture where all adults recognise their responsibility to act on concerns.

Designated Safeguarding Lead (DSL) Training

The designated safeguarding lead and any deputies will undertake training to provide them with the knowledge and skills required to carry out the role effectively. This training will be updated at least every two years.

The DSL will also:

- undertake Prevent duty training;
- have a clear understanding of filtering and monitoring systems and processes;
- maintain awareness of safeguarding risks linked to online safety and emerging technologies, including mobile devices, and wearable technology.

In addition to formal training, the DSL's knowledge and skills will be refreshed at regular intervals, and at least annually, to ensure they remain up to date with national and local safeguarding developments. This may include:

- e-bulletins
- professional networks
- safeguarding forums
- reviewing updated statutory guidance

Induction and New Appointments

All new members of staff will receive safeguarding and child protection training as part of their induction programme.

Any newly appointed DSLs or Deputy DSLs will undertake full DSL training before taking lead responsibility wherever possible. Where this is not immediately achievable, the deputy may assume responsibility on an interim basis, supported by senior leaders, until training is completed.

Governors and Trustees

All Trustees and members of Local Governing Bodies will receive safeguarding and child protection training (including online safety) at induction, which is refreshed at least annually.

Training will ensure that governors and trustees:

- have the knowledge required to fulfil their safeguarding responsibilities and provide effective strategic challenge;
- understand the school's safeguarding systems and policies;
- review and understand the Department for Education's filtering and monitoring standards;
- are assured that appropriate systems are in place to manage risks associated with online activity and emerging technologies and wearable technology;
- can ensure that safeguarding arrangements are effective for all children, including those who are absent from education for prolonged periods.

Governors and trustees who may act as the 'case manager' in allegations against the headteacher will receive additional training to fulfil this role.

Ongoing Training and Safeguarding Culture

Safeguarding training and updates will be provided on a regular basis to ensure all staff remain familiar with:

- safeguarding procedures
- changes to national guidance
- emerging risks
- local safeguarding priorities

This reflects the expectation that safeguarding is an ongoing, dynamic process rather than a one-off activity, and that staff maintain a continuous level of vigilance, including in relation to online and contextual safeguarding risks.

Recording and Monitoring Training

The DSL will maintain accurate records of safeguarding training, including:

- attendance at training sessions
- dates of completion
- confirmation that staff have read and understood relevant sections of KCSIE appropriate to their role

This ensures that any staff who miss training receive appropriate updates promptly upon their return.

Safer Recruitment

At least one member of every appointment panel will have completed Safer Recruitment training, in line with statutory requirements.

The school will ensure that there are sufficient numbers of trained staff and governors to always meet this requirement. Further information is available in the Safer Recruitment policy.

Safeguarding Training Overview

The Trust maintains an up-to-date record of safeguarding training for all staff, governors, and trustees. This includes training in:

- Designated Safeguarding Lead (DSL) and Deputy DSL training
- Prevent awareness
- Filtering and monitoring
- Safer recruitment
- Online safety
- Child protection (annual updates for all staff)

Additional training may include (as appropriate to role):

- Child criminal exploitation (including county lines)
- Child sexual exploitation (CSE)
- Child-on-child abuse
- Honour-based abuse (including FGM and forced marriage)
- Mental health and wellbeing
- First aid and behaviour/positive handling

The Trust ensures that training is appropriate to role, regularly updated and accurately recorded. Records are maintained centrally and monitored by the DSL and safeguarding leaders.

8. Roles and Responsibilities

In line with statutory guidance, the Headteacher will ensure that there are effective safeguarding systems, procedures, and a strong safeguarding culture in place so that all staff understand their responsibilities in safeguarding and promoting the welfare of children.

The Headteacher will ensure that:

- Trust safeguarding policies and procedures are fully implemented, understood, and consistently followed by all staff.
- The Designated Safeguarding Lead (DSL) takes strategic responsibility for safeguarding, including oversight of filtering and monitoring systems and processes.
- Safeguarding systems include appropriate monitoring of risks arising from online activity and the use of mobile devices, meta glasses, and other wearable technologies.
- Allegations relating to any individual or organisation using school premises are managed in line with statutory guidance, and the Local Authority Designated Officer (LADO) is informed promptly where required.
- A clear and up-to-date job description for the DSL is in place and regularly reviewed.
- The DSL is a member of the senior leadership team.
- Sufficient time, funding, training, and resources are allocated to the DSL and safeguarding team to fulfil their responsibilities effectively, including attending multi-agency meetings.
- Staff feel confident and supported to raise safeguarding concerns, including low-level concerns, and that these are addressed in line with whistleblowing and safeguarding procedures.
- Robust induction processes are in place, ensuring all staff understand safeguarding expectations and procedures.
- Appropriate pre-employment checks are undertaken, including safer recruitment practices, and that risk assessments and supervision arrangements are implemented where necessary.
- Arrangements are in place to ensure DSL availability during out-of-hours activities and extended provision.
- Referrals are made to the Disclosure and Barring Service (DBS) where required.
- The school assures itself that any alternative provision used has effective safeguarding arrangements, including safer recruitment, supervision arrangements, and regular review of placements.
- Appropriate staff-to-pupil ratios are maintained at all times.

- There is an awareness of safeguarding risks linked to elective home education, suspensions and exclusions, and that appropriate follow-up and oversight is undertaken.

The Designated Safeguarding Lead (DSL)

The DSL takes lead responsibility for safeguarding and child protection across the school.

Their responsibilities include:

- Identifying and responding to concerns about abuse, neglect and exploitation, and making referrals to children's social care, the police, or other agencies where appropriate.
- Acting as a source of advice, support, and expertise for staff.
- Managing referrals and working with other agencies in line with multi-agency safeguarding arrangements.
- Leading on early help and ensuring timely identification of emerging needs.
- Liaising with the Headteacher and keeping them informed of safeguarding concerns, including ongoing Section 47 enquiries and police investigations.
- Ensuring staff understand safeguarding policies, procedures and how to report concerns.
- Ensuring all staff receive appropriate induction and safeguarding training.
- Maintaining accurate, secure, and detailed safeguarding records, including decisions made and rationale.
- Ensuring records take account of contextual safeguarding factors, including online activity and the involvement of mobile devices, meta glasses, or other technologies where relevant.
- Keeping up to date with local and national safeguarding developments and sharing updates with staff.
- Undertaking Prevent training and maintaining awareness of extremism risks.
- Taking responsibility for filtering and monitoring systems and ensuring staff understand their roles.
- Ensuring compliance with data protection legislation in relation to safeguarding records.
- Reviewing and updating safeguarding policies annually, in collaboration with leaders, governors and trustees.
- Ensuring the safeguarding policy is available to parents and that they understand the school's responsibilities, including referral processes.
- Ensuring child protection files are transferred securely and promptly when a child moves school.
- Maintaining oversight of safeguarding arrangements for pupils in alternative provision.

Trustees and Governors

Trustees and governors are accountable for ensuring that effective safeguarding arrangements are in place and that the school complies with statutory guidance.

They will ensure that:

- Safeguarding policies and procedures are in place, effective and reviewed at least annually.
- The Trust operates safer recruitment practices and appropriate checks are carried out.
- Procedures are in place to manage allegations against staff and those using school premises.
- A senior leader is appointed as DSL with appropriate training, status, and authority.
- Staff receive regular safeguarding training and updates.
- Governors and trustees understand and have read the relevant sections of KCSIE appropriate to their role.
- There is a culture where safeguarding concerns can be raised safely and appropriately.
- Systems are in place to identify and respond to children with mental health needs.
- Children are taught about safeguarding, including online safety, as part of a whole-school approach.
- Safeguarding arrangements reflect risks associated with online activity and emerging technologies, including mobile devices and wearable technologies such as meta glasses.
- All safeguarding concerns and complaints are appropriately addressed and escalated where necessary.
- Procedures are in place to manage low-level concerns about staff.
- Deficiencies in safeguarding practice are addressed promptly.
- A nominated trustee is identified to liaise with the LADO in relation to allegations against the Headteacher.
- Safeguarding effectiveness is monitored and evaluated regularly.
- Consideration is given to the provision of safeguarding supervision for DSLs.

The Role and Responsibilities of All Staff and Volunteers

All staff and volunteers have a responsibility to safeguard children. They must read and understand the relevant sections of Keeping Children Safe in Education appropriate to their role and confirm this regularly. They must be aware of the signs of abuse, neglect and exploitation and know how to respond.

All staff will be familiar with safeguarding systems, including:

- safeguarding and child protection policy
- staff code of conduct
- behaviour and relationships policy
- online safety and acceptable use policies
- Prevent policy
- whistleblowing procedures

- procedures for children missing education

Staff should maintain an attitude of 'it could happen here' and always act in the best interests of the child.

Staff must recognise that safeguarding includes risks beyond the home environment, including online and contextual risks, and those arising through mobile devices and wearable technologies**.**

Staff must:

- Recognise that disclosures may be direct or indirect.
- Be alert to signs and indicators of abuse and exploitation.
- Treat child-on-child abuse seriously and report concerns.
- Respond to disclosures with reassurance (without promising confidentiality).
- Record and report concerns promptly.
- Engage with safeguarding updates and training.

Staff must also be aware that children with SEND, or health needs may face additional barriers and must take this into account when identifying concerns.

All staff and volunteers have a duty to raise concerns about poor or unsafe practice. Concerns should be reported to the Headteacher, or to the Trust safeguarding lead or Chair of Trustees if the concern relates to the Headteacher.

Where staff feel unable to raise concerns internally, they may use external whistleblowing routes, including the Local Authority Designated Officer (LADO) or the NSPCC whistleblowing helpline.

See Whistleblowing policy for further information.

9. Early Help

Early help is key to identifying and addressing emerging concerns and preventing issues from escalating. All staff are expected to be alert to the early signs of abuse, neglect, or exploitation and to take appropriate action in line with this policy.

Where an early help response is appropriate, the Designated Safeguarding Lead (DSL) will take overall responsibility for coordinating the school's involvement. This will include liaising with other professionals and agencies and initiating or contributing to an inter-agency assessment, where required.

Staff may be required to support early help processes and, in some cases, may act as the lead practitioner where this is appropriate and agreed.

In line with Working Together to Safeguard Children the school will:

- Work in partnership with local safeguarding partners to understand thresholds for intervention and the range of early help services available.
- Contribute to assessments and plans to support children and families, ensuring that the child's voice is central to decision-making.
- Consider the full context of the child, including risks outside the home, such as peer groups, community influences, and online activity, including the impact of mobile devices and other technologies.

The DSL will keep all early help cases under regular review. If the child's situation does not improve or there are increasing concerns, the DSL will consider escalation to children's social care in line with local safeguarding procedures.

Timelines for intervention will be monitored, and action will be taken promptly where progress is insufficient, ensuring children receive the right help at the right time.

Local Procedures

The school follows locally agreed early help and safeguarding procedures, including those provided by relevant safeguarding partnerships.

Further information can be accessed via local safeguarding partnership guidance, including:

(Insert and retain only relevant links for your LA)

- LA Safeguarding Children Partnership
  EMAIL / Phone numbers
- Early Help Consultation Line:
  Email / Phone numbers

10. When to be concerned

Categories of Abuse

All staff and volunteers must be aware that abuse, neglect, and exploitation can take many forms. The main categories are:

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse including verbal abuse
- **Exploitation (including child sexual exploitation, child criminal exploitation, and online exploitation)**

Staff must also recognise that abuse can occur both within and beyond the home, including online and within peer groups, communities, and digital environments. This includes risks associated with mobile devices, and other technologies**.**

All staff and volunteers must act in accordance with this policy if a child presents with indicators of abuse, neglect, or exploitation (see Appendix 1).

Children with Special education needs, disabilities or health issues can face additional safeguarding challenges both online and offline. Additional barriers can exist in recognising abuse, neglect, and exploitation for these pupils, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These pupils being more prone to peer group isolation or bullying and disproportionately impacted without showing outward signs
- Communication barriers and difficulties in managing and reporting challenges risks that they do not understand what is happening to them is abuse
- The need for intimate care
- Increase isolation from other children
- That these pupils are more dependent on adults for care
- These children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content / behaviours

Any reports of abuse involving children with SEND with therefore require close liaison with the DSL and SENCO.

Dealing with a Disclosure / Reporting Concerns

(See Appendix 3 – Flowchart)

If any member of staff has a concern about a child, they must act immediately. Concerns must be reported without delay to the Designated Safeguarding Lead (DSL), or in their absence, the Deputy DSL.

All concerns must be recorded promptly and accurately using the school's recording system (e.g. My Concern / CPOMS).

All staff should be aware of the process for making referrals to children's social care and understand statutory assessments under the Children Act 1989, including:

- Section 17 (Child in Need)
- Section 47 (Child at risk of significant harm)

Staff should understand their role within multi-agency safeguarding arrangements, including contributing to assessments and sharing relevant information in line with data protection and safeguarding guidance.

Responding to a Disclosure

If a child discloses abuse, the member of staff must:

- Find an appropriate time and place to listen carefully to the child.
- Listen without displaying shock, disbelief, or judgement.

- Not promise confidentiality; explain that information may need to be shared to keep them safe.
- Allow the child to speak freely without interruption.
- Avoid leading questions; only ask open questions such as *"Tell me…"* or *"How did that happen?"* where clarification is necessary.
- Not investigate, probe, or examine injuries.
- Not criticise the alleged perpetrator.
- Reassure the child that they have done the right thing in telling someone.
- Make clear what will happen next and who will need to be informed.
- Establish only the information necessary to determine whether a referral is required.
- Make a clear, factual, accurate and timely record of the disclosure.
- Record concerns using the agreed system (e.g. My Concern / CPOMS).
- Inform the DSL immediately.
- Not share information with others unless directed to do so by the DSL.

Where relevant, staff must log any involvement of digital devices (e.g. mobile phones or other technology), including where images, messages, or recordings form part of the concern.

The same approach must be followed where the disclosure is made by:

- another child
- a parent or carer
- a third party

Staff must remember that education settings are not investigative agencies. Concerns must be referred appropriately and without delay.

Making a Referral

Once informed, the DSL will decide whether a referral to Children's Social Care is required. Where there is uncertainty, advice will be sought from the Multi-Agency Safeguarding Hub (MASH) or equivalent.

Referrals will be made as soon as possible, typically by telephone followed by written confirmation using the appropriate referral form.

Local Authority Contacts

(INSERT only relevant local authority)

LA:
Multi Agency Safeguarding Hub (MASH)
Tel:

Out of hours:
LADO / Safeguarding Coordinator:

Referrals must be made without delay where there is a safeguarding concern.

Escalation

If the DSL believes that appropriate action has not been taken by children's services, they will follow local escalation procedures to ensure the child's safety is prioritised.

Escalation will take place in line with local safeguarding partnership guidance, reflecting the expectation within Working Together that professionals should challenge decisions where necessary to protect children.

Key Principles

- Safeguarding concerns must be acted upon immediately.
- Accurate recording is essential.
- Information sharing must be timely and appropriate.
- Safeguarding includes online and contextual risks, including those linked to technology and digital environments.
- The child's welfare is always paramount.

11. Confidentiality and information sharing

Safeguarding children raises important issues of confidentiality that must be understood by all staff and volunteers.

All staff and volunteers have a responsibility to share relevant information to safeguard and protect children. Effective information sharing is a key component of safeguarding practice and is essential to ensure that children receive appropriate and timely support.

Information sharing will be carried out in accordance with statutory guidance, including *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers*, and in line with the principles of the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and human rights legislation.

These frameworks are not barriers to sharing information where a child is at risk of harm but instead provide a structure to ensure that information is shared lawfully, proportionately and in the best interests of the child.

Key Principles

Staff should:

- Share information where it is necessary to safeguard and promote the welfare of a child.
- Be open and honest with children and families about how information will be used and shared, unless this would place a child at increased risk of harm.

- Seek advice from the Designated Safeguarding Lead (DSL) where there is any uncertainty.
- Record decisions and the rationale for sharing or not sharing information.

In line with Working Together, practitioners should be confident in using their professional judgement to share information early to support children and families effectively, particularly where there are emerging concerns.

Confidentiality and Disclosures
If a child discloses information and asks for it to remain confidential, staff must:

- Explain, in a manner appropriate to the child's age and understanding, that they cannot promise complete confidentiality.
- Reassure the child that the information will only be shared with professionals who need to know to keep them safe.
- Make clear that their safety and wellbeing are the priority.

Sharing Information Appropriately
Staff and volunteers must ensure that:

- Information is shared only with those who need to know.
- Information is relevant, necessary, and proportionate.
- Confidential records are handled and stored securely in line with data protection requirements.

Where safeguarding concerns involve online activity or digital evidence (for example, messages, images or recordings from mobile devices, or other technologies), this information must be handled carefully, recorded appropriately, and shared with relevant professionals to support safeguarding actions.

12. Communication with Parents

Parents and carers will be made aware of the school's safeguarding and child protection policy through published information, including the school website, and during initial meetings with parents and carers of new pupils. A hard copy of this policy will be made available on request.

We recognise the importance of working in partnership with parents and carers to safeguard and promote the welfare of children. Wherever appropriate, concerns about a child will be discussed openly with parents or carers. The Designated Safeguarding Lead (DSL) will normally lead these discussions following a concern or disclosure.

Other staff will only speak to parents or carers about safeguarding concerns following consultation with the DSL.

In line with statutory guidance, decisions about engaging with parents will always be made in the best interests of the child. If there is reason to believe that informing parents or carers

may place the child, or another individual, at increased risk of harm, the school will seek advice from children's social care before making contact**.**

Managing Allegations Involving Children

In cases where there are safeguarding concerns involving child-on-child abuse, the school will normally inform the parents or carers of all children involved.

However, we will:

- Carefully consider what information can be shared
- Ensure that sharing information does not compromise any investigation or place any child at risk
- Work closely with children's social care and/or the police to ensure a consistent and appropriate approach

Supporting Children and Families

The DSL will, in collaboration with relevant agencies (on a case-by-case basis):

- Meet with the victim and their parents or carers to:
    - discuss safeguarding arrangements
    - explain how the concern will be managed
    - identify appropriate support and next steps
- Meet with the parents or carers of the alleged perpetrator to:
    - discuss the support being provided
    - explain any measures being put in place (e.g. changes to classes or supervision arrangements)
    - clarify the reasons for decisions made

These discussions will be conducted in a sensitive, proportionate and child-centred manner, recognising the needs and rights of all children involved.

Key Principles

- The child's welfare is the paramount consideration
- Communication will be clear, timely and respectful
- Information will be shared appropriately and in line with safeguarding and data protection guidance
- Decisions will reflect professional judgement, multi-agency advice, and the need to protect children from harm, including risks arising in online or digital contexts

13. Record Keeping

Safeguarding Record Keeping

The Trust uses an electronic recording system (e.g. *My Concern / CPoms*) to report, manage and store safeguarding concerns.

The system is secure and complies with Department for Education guidance and data protection legislation. Access is strictly controlled:

- The Designated Safeguarding Lead (DSL) and Deputy DSLs have full access to safeguarding records
- Other staff can submit and update concerns but have restricted access unless authorised by the DSL

This ensures that safeguarding information is appropriately shared on a need-to-know basis while maintaining confidentiality and security.

Storage of Records

Where historic or transferred records exist in paper format (for example, prior to the introduction of electronic systems or received from another setting), these will:

- be stored securely in locked cabinets
- be accessible only to authorised safeguarding staff
- be uploaded to the electronic system where appropriate, particularly where concerns remain ongoing

All safeguarding records will be retained in line with the Trust's records retention schedule and relevant statutory guidance.

Records must be clear, accurate, factual and include context, including any safeguarding concerns linked to online activity or the use of digital devices such as mobile phones, or other technologies, where relevant.

Transfer of Safeguarding Records

Where a child transfers to another school or education setting, and safeguarding concerns are known, the DSL will ensure that the child protection file is transferred securely and without delay.

To support continuity of safeguarding:

- Files should be transferred **within 5 days for in-year transfers**
- Or **within the first 5 days of the new term**

Where concerns are complex or ongoing, the DSL will:

- make direct contact with the receiving school's DSL
- share relevant information in advance to ensure appropriate safeguarding arrangements can be put in place

All safeguarding records will:

- be transferred separately from the child's main academic file
- be transferred securely

- have a receipt of transfer obtained and retained

This reflects the expectation that safeguarding information is shared promptly to protect children and ensure continuity of support.

Confidentiality and Access to Records
Safeguarding records are confidential and will only be shared with those who need the information to safeguard the child.

Any request for access to safeguarding information from external parties (e.g. solicitors or third parties) will:

- be referred to the Headteacher and DSL
- be considered in line with data protection legislation
- involve consultation with the Trust's Data Protection Officer (DPO)
- include seeking legal advice where appropriate

All safeguarding records, including records of concerns and multi-agency involvement, will be:

- stored securely
- kept separate from the child's main educational record
- accessible only to the DSL, Deputy DSLs, and Headteacher

Key Principles

- Safeguarding records must be accurate, timely and securely stored
- Information sharing must support the safety and wellbeing of the child
- Records must reflect the full context of safeguarding concerns, including environmental and digital factors
- The DSL has strategic oversight of safeguarding records to ensure quality, consistency, and compliance with statutory guidance

14. Dealing with Allegations against Staff, Trainees, Supply staff, Volunteers, and other adults

(Refer to KCSIE Part 4 and Appendix 3 Flowchart)

An allegation is any information which indicates that a member of staff, trainee, supply teacher, volunteer, contractor, or an individual/organisation using school premises may have:

- behaved in a way that has harmed a child, or may have harmed a child;

- possibly committed a criminal offence against, or related to, a child;
- behaved in a way that indicates they may pose a risk of harm to children;
- behaved in a way that may not meet the harm threshold but is inconsistent with the staff code of conduct (see low-level concerns below).

This includes behaviour both within and outside of school, including personal, professional, and online contexts.

All adults working with children must understand that their behaviour, including online conduct and use of technology (e.g. mobile devices, and wearable technology), may have safeguarding implications.

Safer Working Practice

All staff; Trainees, Supply staff and volunteers must:

- be familiar with and follow the Staff Code of Conduct
- follow Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings
- always maintain professional boundaries

Reporting Allegations

Any allegation or concern about an adult must be reported **immediately**:

- to the Headteacher
- or to the Designated Safeguarding Lead (DSL) where appropriate

If the concern relates to the Headteacher, it must be reported to:

- the Trust Safeguarding Lead
- the CEO
- the Chair of Trustees

Staff must not investigate allegations themselves or ask leading questions.

Confidentiality must not be promised. Information will only be shared on a 'need to know' basis to safeguard children.

Recording Concerns

The person receiving the allegation must:

- make an accurate, contemporaneous written record of the concern
- record the exact words used where possible
- include the date, time, location, and details of those present
- sign and date the record

Concerns must also be recorded using the school's safeguarding system (e.g. My Concern / CPOMS) where appropriate.

Staff must not make judgements about the validity of the concern — all concerns must be passed on in line with this procedure.

Role of the Headteacher

The Headteacher will:

- take all allegations seriously
- consider whether the allegation meets the threshold for referral
- not investigate or take detailed statements

Where the allegation meets the criteria, the Headteacher will:

- contact the Local Authority Designated Officer (LADO) **without delay**
- provide written confirmation of the allegation

Following advice from the LADO:

- the subject of the allegation will be informed as appropriate
- next steps will be agreed, including any investigation or safeguarding action

Contacting the LADO

ADD IN SPECIFIC DETAILS

Greenwich:
NAME – NUMBER
childrens-lado@royalgreenwich.gov.uk

Allegations Against the Headteacher

Where an allegation is made against the Headteacher:

- the CEOs, Trust Safeguarding Lead or Chair of Trustees must be contacted immediately
- they will take responsibility for contacting the LADO

Low-Level Concerns

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- does not meet the threshold for referral to the LADO

Examples include (but are not limited to):

- being overly familiar with children
- showing favouritism
- engaging in inappropriate one-to-one interactions

- humiliating or undermining pupils
- using mobile phones, cameras, or wearable technology to take images or recordings of pupils

Creating a Culture of Openness

The Trust is committed to a culture where all concerns are shared openly and addressed promptly.

We will promote this by:

- ensuring all staff understand expected behaviours and professional boundaries
- encouraging staff to report concerns about themselves and others
- handling concerns in a proportionate, fair, and timely manner
- identifying patterns of behaviour that may indicate risk
- addressing issues early to prevent escalation

All low-level concerns must be reported to the Headteacher.
Where the concern relates to the Headteacher, it must be reported to Trust leaders as outlined above.

15. Allegations of abuse made against other children (Child on Child Abuse including harassment and violence)

This policy recognises that children can abuse other children (child-on-child abuse), and that such behaviour can occur both in and outside of school, including online. This issue requires safeguarding considerations to both the victim and alleged perpetrator; it is preventable and can involve serious physical harm or threats involving weapons.

All staff understand that child-on-child abuse is unacceptable and will always be taken seriously. It will never be dismissed as “banter,” “part of growing up” or tolerated under any circumstances.

We recognise the gendered and/ or sexual identification nature of some forms of abuse including misogyny; which can create inequalities in the proportions of victims between girls and boys, however, all forms of child-on-child abuse are taken seriously and responded to appropriately

Child-on-child abuse includes behaviour both face-to-face and online, including the misuse of digital technology such as mobile devices, social media platforms, and wearable technologies (e.g. meta glasses), which may be used to record, share or facilitate abuse.

Harmful sexual Behaviour (HSB)

The school recognises that harmful sexual behaviour (HSB), including sexual violence and sexual harassment, can occur between children of any age and gender, both face-to-face and online, and will be treated as a safeguarding concern. All staff will maintain an attitude of *"it could happen here"* and understand that such behaviours exist on a continuum, from inappropriate sexualised language to serious assault, and are never acceptable and will not be tolerated or dismissed as banter, "part of growing up."

HSB includes, but is not limited to, sexual harassment, sexual violence, coercion, the sharing of self-generated or manipulated intimate images (including those created using AI), and behaviours underpinned by misogyny, which is recognised as a form of harmful sexual behaviour. The school acknowledges that these behaviours may be underreported and will take a proactive approach to identifying patterns, understanding the scale of need, and challenging inappropriate conduct at an early stage to prevent escalation.

The school adopts a zero-tolerance approach, ensuring that all victims are listened to, believed, reassured, and supported, and that they are kept safe whilst also understanding the complexity that surrounds incidents and considers the vulnerabilities of the alleged perpetrator. The wishes of the victim will be carefully considered when determining next steps, although this will be balanced with the school's duty to safeguard all pupils. Outcomes will always prioritise the protection, wellbeing, and educational continuity of the victim.

Appropriate action will also be taken in respect of the alleged perpetrator(s), which may include safeguarding support, behaviour interventions, and disciplinary measures, recognising that children who display HSB may themselves have unmet needs or have experienced abuse. The school will carefully consider how to manage the ongoing interaction between pupils, including within shared spaces, transport, and the curriculum, to reduce risk.

Responding to Concerns

Most cases of pupil conflict or harmful behaviour will be addressed through the school's behaviour and relationships policy. However, this safeguarding policy applies where behaviour raises safeguarding concerns.

This includes where the behaviour:

- Is serious or potentially a criminal offence
- Places a child at risk of harm
- Is violent or threatening
- Involves coercion, control, or exploitation
- Involves sexual violence, sexual abuse, or sexual harassment
- Involves the sharing of self-generated intimate images and videos including those generated using AI or other harmful digital content

If an Allegation is Made

Where a pupil makes an allegation against another pupil:

- The concern must be recorded promptly and passed to the DSL
- Staff must **not investigate**
- The DSL will determine next steps, including whether to involve:
    - children's social care
    - the police
    - universal services and community based early help and consider:
- The ages and developmental stages of the children involved
- The victims wishes
- Any power imbalance
- Whether the incident was isolated or part of a sustained pattern of abuse including other forms.
- Intrafamilial harm aspects

The DSL will:

- Complete a risk assessment (consider environmental, relational and digital factors, including the role of mobile devices, social media and any recording or sharing of content)
- Put in place a support and safety plan for all children involved
- Ensure children have access to trusted adults and appropriate support
- Consider any contextual factors, including peer dynamics, community influences and online activity

Where appropriate, referrals may be made to external services, including CAMHS or other support agencies.

Managing Risk and Supporting Children

The school will ensure:

- Victims are supported and protected at all stages
- Alleged perpetrators receive appropriate support and intervention
- Any impact on wider groups of pupils is addressed

Preventative Approach

We will minimise the risk of child-on-child abuse by:

- Challenging inappropriate, sexualised or derogatory language and behaviour
- Maintaining a culture where children feel safe to report concerns
- Teaching pupils about:
    - respectful relationships
    - consent
    - appropriate online behaviour
- Embedding safeguarding and online safety across the curriculum
- Training staff to recognise that harmful behaviour may indicate a child is experiencing abuse themselves

- Enabling effective approaches to ensure pupils can report concerns

Sharing of self-generated intimate images and videos including those generated using AI

If a member of staff becomes aware of an incident involving the sharing of intimate images, they must report it immediately to the DSL.

Staff must not:

- View, copy, store or share the imagery
- Ask pupils to share or delete images
- Investigate or question pupils in detail
- Share information with others beyond the DSL
- Blame or shame any child involved

Staff should:

- Reassure the child
- Explain that the concern must be reported
- Pass the information to the DSL immediately

DSL Response and Initial Review

Following a report, the DSL will hold an initial review meeting to determine:

- Whether there is immediate risk of harm
- Whether a referral to police or children's social care is required
- Whether it is necessary to view the imagery (this will **rarely be appropriate**)
- What further information is required
- Whether other schools, agencies or professionals need to be involved
- Whether parents should be informed

Referral to External Agencies

The DSL will make an immediate referral to the police and/or children's social care if:

- The incident involves an adult
- There are concerns of coercion, exploitation, grooming or lack of capacity to consent
- The content is violent or developmentally inappropriate
- A child under 13 is involved in sexual imagery
- There is risk of significant harm (including mental health concerns)

If thresholds for referral are not met, the DSL will manage the incident internally, ensuring that all decisions are recorded.

Further Investigation and Support

Where no immediate referral is made, the DSL will:

- conduct a further review
- gather relevant information carefully
- continue to assess risk

If risk increases at any stage, referrals will be made immediately.

Parents will usually be informed at an early stage unless doing so would place the child at risk of harm.

Curriculum and Education

Pupils are taught about healthy relationships and online safety through the curriculum. This includes:

- supporting children to develop the skills that form the building blocks of all positive, healthy and respectful relationships
- Understanding boundaries, consent and kindness in relationships
- Stereo typing, prejudice and equality
- Body confidence and self esteem
- How to recognise and report concerns about an abusive relationship including coercive and controlling behaviour
- The concepts of and laws relating to all forms of sexual harassment and abuse and how to seek support
- What constitutes sexual harassment and violence and why these are always unacceptable
- Understanding online harms such as risks of sharing images, deepfakes, influencers
- Legal implications
- Impact on wellbeing and reputation
- Demonstrates a culture of zero tolerance for sexism, racism, misogyny / misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour, violence.

Pupils are also taught strategies to:

- Respond to pressure
- Seek help
- Report concerns

16. Safeguarding and Mental Health

All staff should be 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 will be alert to behavioural, emotional and presentation-based signs that may suggest a child is experiencing mental health difficulties or is at risk of developing them.

In line with safeguarding guidance, staff should recognise that mental health concerns may be both a safeguarding issue and a potential outcome of abuse, neglect, exploitation or adverse experiences.

Responding to Concerns

- If staff have a mental health concern about a child that also raises safeguarding concerns, they must take immediate action and report this to the Designated Safeguarding Lead (DSL) without delay.
- If a mental health concern does not meet safeguarding thresholds, staff should discuss the concern with the DSL or Inclusion Lead to agree an appropriate course of action and support plan.

Staff must use professional curiosity and consider the wider context of the child's life, including home circumstances, peer relationships, and online activity.

Immediate Support

Any urgent concerns relating to a child's mental health or wellbeing must be referred immediately to the school's trained mental health first aider or appropriate pastoral lead, who will:

- Provide immediate support
- Assess risk (including self-harm or suicidal ideation where appropriate)
- Signpost to further internal or external support services

Early Help and Multi-Agency Working

In line with Working Together to Safeguard Children, mental health concerns should be addressed through early help where appropriate, including working with families and partner agencies to provide timely support.

Where necessary, the school will:

- Refer to external services such as CAMHS or other specialist providers
- Contribute to multi-agency plans
- Share relevant information in line with safeguarding and data protection guidance

Curriculum and Whole-School Approach

The school promotes positive mental health and wellbeing through a whole-school approach, including:

- The PSHE and relationships curriculum
- A supportive and inclusive environment
- Opportunities for pupils to seek help and talk to trusted adults

This includes teaching pupils about emotional wellbeing, resilience, and how to seek support, including in relation to pressures experienced online and through digital technologies.

Key Principles

- Mental health concerns must be taken seriously
- Safeguarding must always be considered alongside mental health concerns
- Support should be early, coordinated and proportionate
- The child's welfare remains paramount
- All staff have a responsibility to identify, respond to, and seek appropriate support for mental health concerns

17.Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence within their home or family environment. This can include exposure to abuse between parents, carers or other family members.

In line with safeguarding guidance, children who see, hear, or experience the effects of domestic abuse are recognised as victims in their own right. They may feel responsible for what is happening, experience fear, or be forced to leave their home environment as a result.

Forms of Domestic Abuse

Domestic abuse can occur in a range of relationships and contexts, including:

- Intimate partner violence
- Abuse within wider family relationships
- Teenage relationship abuse (including between children)
- Child or adolescent to parent violence and abuse
- Domestic abuse may include:
- Physical abuse
- Sexual abuse
- Emotional or psychological abuse
- Financial or economic abuse
- Coercive or controlling behaviour

It can also include non-physical forms of harm, including exposure to abusive behaviour or its impact on others within the household.

Impact on Children

Exposure to domestic abuse can have a significant and long-lasting effect on children, including:

- Emotional and psychological harm
- Anxiety, trauma or attachment difficulties
- Impacts on behaviour, development and relationships
- Reduced ability to learn and engage in education

Staff must recognise that domestic abuse may present through a range of indicators, and that children may not disclose directly. Professional curiosity and vigilance are essential.

Safeguarding Response

The Designated Safeguarding Lead (DSL) will:

- Assess concerns and ensure appropriate safeguarding action is taken
- Provide or coordinate support in line with the child's needs
- Keep accurate and up-to-date records of concerns and actions
- Work with partner agencies, including children's social care, to ensure children receive appropriate support
- Where appropriate, early help or multi-agency intervention will be initiated to support both the child and family.

Operation Encompass

The school participates in **Operation Encompass**, which ensures that schools are informed by the police of domestic abuse incidents where a child in the household may have been affected.

This allows the school to:

- provide immediate and appropriate support
- respond sensitively to the child's needs
- ensure staff are aware of potential safeguarding concerns

Key Principles

- Children exposed to domestic abuse are victims and must be supported
- Concerns must be acted on promptly and appropriately
- Safeguarding responses must be child-centred and proportionate
- Multi-agency working is essential to ensure effective support and protection

17. Mobile Technology and Device Use

(Refer to personal devices policy)

The Trust recognises that mobile technology is an integral part of modern life but also presents safeguarding risks. This includes risks associated with the use of mobile phones,

cameras, social media, and wearable technologies such as meta glasses or other recording-enabled devices.

The use of devices by staff, pupils and parents must be managed to ensure the safety, privacy and wellbeing of all children.

Staff Use of Mobile Devices -

Staff are permitted to bring personal mobile phones to school for their own use. However:

- Use must be limited to non-contact time and must not take place in the presence of pupils.
- Personal devices must be stored securely (e.g. in bags or cupboards) during teaching and contact time.
- Staff must not use personal devices to communicate with pupils.

Staff must not:

- Take photographs, videos or audio recordings of pupils using personal devices
- Use any wearable technology (including meta glasses) to record, photograph or store images or audio relating to pupils

All recordings and images must only be taken using school-approved devices and systems in line with data protection and safeguarding procedures.

Pupil Use of Devices

The use of mobile phones and personal devices by pupils is managed in line with the school's behaviour and online safety policies.

The school will:

- Set clear expectations about when and how devices can be used
- Monitor and respond to inappropriate use
- Take action where device use creates safeguarding risks

This includes use of devices for recording, sharing images, accessing inappropriate content, or involvement in bullying, harassment or exploitation.

Parent and Visitor Use of Devices

Parents, carers and visitors must use mobile devices responsibly on school premises.

They must not:

- Take photographs or recordings of children other than their own without permission
- Use devices in ways that infringe the privacy or safety of pupils or staff

The school reserves the right to restrict or challenge device use where there are safeguarding concerns.

Data Protection and Safeguarding

All use of images, video and recordings will comply with:

- General Data Protection Regulation (GDPR)
- Data Protection Act 2018

Any images or recordings taken as part of school activities will be:

- stored securely
- used only for authorised purposes
- shared in accordance with consent and safeguarding guidance

19. Online Safety

Regular training ensures that staff have a strong understanding of all aspects of online safety, including the **four Cs of online risk (content, contact, conduct and commerce)**.

Staff are also trained to understand the risks associated with:

- misinformation and disinformation (including fake news)
- conspiracy theories
- online radicalisation

Staff will also be aware of safeguarding risks associated with evolving technologies, including mobile devices, social media platforms and wearable technologies.

Reporting Online Safety Concerns

All staff must report online safety concerns immediately to the Designated Safeguarding Lead (DSL) using the school's safeguarding procedures.

Concerns may include online abuse, cyberbullying, inappropriate content, exploitation, or incidents involving the misuse of devices or digital platforms.

Curriculum

The PSHE and computing curriculum places a strong emphasis on teaching children how to use the internet safely, responsibly and respectfully.

Pupils are taught:

- how to recognise risks online
- how to seek help and report concerns
- how to manage situations that cause them distress
- how to safely navigate digital environments, including social media and emerging technologies

Working with Parents and Carers

The school supports parents and carers to keep their children safe online by:

- providing guidance and advice
- signposting to external resources
- offering workshops or information sessions where appropriate

This includes raising awareness of risks associated with mobile devices, gaming, social media and emerging technologies.

Online Learning and Platforms

All online learning platforms used by the school are secure and accessible only to authorised users, including pupils and staff.

Where online learning includes live streaming or video interaction, staff must:

- ensure appropriate parental consent is obtained where required
- maintain professional standards at all times
- ensure their environment is appropriate, with no personal or sensitive information visible
- ensure that background noise does not compromise privacy
- ensure no unauthorised individuals are present during sessions
- dress appropriately in line with professional expectations
- maintain control of the session and online environment
- ensure that sessions, chats or communications are retained where appropriate in line with safeguarding and data protection guidance

Staff must remain vigilant to safeguarding risks during online interaction, including potential recording, image capture, or misuse of content by pupils or others.

Key Safeguarding Expectations

- Online safety is a key component of the school's safeguarding approach
- Staff must remain vigilant to emerging digital risks
- All concerns must be reported promptly
- **Safeguarding applies equally in online and offline environments**

Further Guidance

Further detail is provided in the Online Safety Policy, Acceptable Use Policy, Data Protection Policy, and Privacy Notices.

20. Attendance

Please refer to the Attendance policy

We recognise the clear link between attendance and safeguarding, and that poor attendance, persistent absence or patterns of absence may be an indicator of underlying safeguarding concerns.

Our Attendance Policy sets out robust procedures to promote good attendance and ensure that children are safe, recognising that absence can be linked to a range of safeguarding factors, including mental health, family circumstances, exploitation, or disengagement from education.

In line with statutory expectations and updated guidance, attendance is treated as a safeguarding priority, and concerns will always be considered in the wider context of the child's lived experience.

Safeguarding Approach to Attendance

The school will:

- Monitor attendance closely to identify patterns of concern at the earliest stage
- Take prompt and proportionate action where concerns arise
- Work in partnership with parents, carers, and relevant agencies to address barriers to attendance
- Consider whether absence may be linked to safeguarding risks, including exploitation, neglect, mental health needs, or online influences
- Ensure children who are persistently absent or missing from education receive appropriate support and intervention

21. Managing complaints Arising from Safeguarding Concerns

Safeguarding is a priority, and any concerns or complaints relating to the safety or welfare of a child will be taken seriously, acted upon promptly and managed in a way that is child-centred, proportionate and in line with statutory safeguarding guidance.

Initial Response

All safeguarding-related complaints will be:

- Acknowledged promptly
- Taken seriously regardless of how they are raised
- Managed with sensitivity, discretion, and urgency

Any member of staff receiving a complaint must ensure it is passed immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL and Headteacher. Depending on the nature of the concern a decision will be made about, who will take lead responsibility for:

- **Reviewing the concern**

- **Determining next steps**
- **Ensuring appropriate action is taken**

Assessment and Safeguarding Action

The DSL will assess the nature and seriousness of the complaint, using professional judgement and, where necessary, seeking advice from external agencies.

Where the concern meets safeguarding thresholds, the DSL will take appropriate action, which may include:

- Gathering and reviewing relevant information
- Consulting with children's social care, the police, or other partner agencies
- Making a referral to children's social care or initiating a strategy discussion
- Implementing immediate safeguarding measures to protect the child

In line with Working Together, decisions will prioritise the safety and welfare of the child and may involve early help or multi-agency intervention where appropriate.

Confidentiality and Support

Throughout the process:

- Information will be shared on a 'need to know' basis
- Confidentiality will be maintained in line with safeguarding and data protection principles
- All individuals involved will be treated with respect and fairness

Appropriate support will be offered to children, families and staff affected by the concern, recognising the potential emotional impact.

Outcome and Communication

Following investigation or review:

- Outcomes and actions will be recorded clearly
- Relevant information will be shared with appropriate parties
- Communication will be managed carefully, considering confidentiality and legal considerations

The school will ensure that communication supports safeguarding and does not compromise any ongoing investigations or place individuals at risk.

Escalation

If there are concerns about the handling or outcome of a safeguarding complaint:

- The matter may be escalated internally to senior leaders or Trust representatives
- External escalation routes may be used, including:

- Local safeguarding partners
- Children's social care
- The Local Authority Designated Officer (LADO), where appropriate

In line with statutory guidance, professionals are expected to challenge decisions where they believe a child remains at risk.

Learning and Continuous Improvement

The Trust is committed to continuous improvement in safeguarding practice.

Where appropriate:

- Lessons learned will be identified
- Policies and procedures will be reviewed and updated
- Training and practice will be strengthened

This supports the development of a strong safeguarding culture where concerns are learned from, and practice continually improves.

Appendix 1: Types and Indicators of Abuse

(To be read in conjunction with Keeping Children Safe in Education – Part 1 & Annex B)

This appendix provides a summary of the main categories and indicators of abuse. It is intended to support staff awareness and must be read alongside safeguarding training and statutory guidance

Categories of Abuse

- **Physical abuse**: causing physical harm, including hitting, shaking, poisoning, burning or fabricated/induced illness.
- **Emotional abuse**: persistent emotional harm that impacts a child's development, including rejection, humiliation, verbal abuse, exposure to domestic abuse or serious bullying.
- **Sexual abuse**: forcing or enticing a child to take part in sexual activities, including online abuse and exploitation (most often committed by individuals known to the victim).
- **Neglect**: ongoing failure to meet a child's basic physical and/or emotional needs.

Abuse and exploitation may occur in any setting (within or beyond the home), including online, and may be carried out by adults or other children. Children may experience more than one type of abuse.

Possible Indicators of Abuse

Indicators rarely occur in isolation. Staff should consider patterns, frequency, and context, and use professional judgement.

Examples may include:

- unexplained injuries or inconsistent explanations
- sudden changes in behaviour, mood, or presentation
- withdrawal, anxiety, fearfulness, or aggression
- poor hygiene, hunger, or persistent tiredness
- sexualised behaviour inappropriate to age
- reluctance to go home or unexplained absences
- involvement in risky online behaviour or use of devices in a way that may indicate harm (e.g. sharing images, exploitation or contact with unknown individuals)

Additional Safeguarding Concerns

All staff should be aware of wider safeguarding issues that may place children at risk, including:

- Child sexual exploitation (CSE) and child criminal exploitation (CCE), including county lines
- Child-on-child abuse (including sexual harassment, violence, and online abuse)
- Sharing of self-generated intimate images and videos including those generated using AI images
- Domestic abuse
- Honour-based abuse (including FGM and forced marriage)

- Radicalisation and extremism (Prevent duty)
- Children missing education or persistent absence
- Mental health needs
- Private fostering

These issues may overlap and should be considered within a child's wider context, including peer relationships, community influences, and online environments.

Online and Contextual Safeguarding

Safeguarding risks increasingly occur in digital environments. Staff must be aware of risks linked to:

- social media and online platforms
- cyberbullying and online harassment
- grooming and exploitation
- misinformation and harmful content
- use of mobile phones and wearable devices for recording or sharing harmful material

Key Safeguarding Principles

- The child's welfare is paramount
- Concerns should never be ignored or delayed
- Staff must act on patterns and professional curiosity, not just single incidents
- Abuse may be **hidden or unreported**
- All concerns must be reported to the DSL in line with safeguarding procedures

APPENDIX 2 -Record Keeping and Referral Guidance

Safeguarding Record Management
It is essential that the school maintains clear, accurate and contemporaneous safeguarding records. Records must be based on observation and evidence, clearly distinguishing between fact, allegation, hearsay, and professional opinion, and must demonstrate the decision-making process and actions taken.

Safeguarding information is held securely and separately from a child's main educational record and is accessible only to the Designated Safeguarding Lead (DSL), Deputy DSLs, and Headteacher. Information is shared with staff strictly on a 'need to know' basis, ensuring that staff understand risks and required actions without unnecessary disclosure of confidential details.

Recording Concerns
All safeguarding concerns, disclosures and incidents must be recorded promptly using the school's electronic recording system (*My Concern / CPoms*).
This includes:

- initial concerns
- observations
- disclosures
- ongoing monitoring
- multi-agency documentation, including child protection conference minutes

Where relevant, records must include contextual information, including online activity and any involvement of digital devices (e.g. mobile phones, social media, or wearable technology).

Initial Concerns and Disclosures
Any concern about a child must be reported immediately to the DSL or Deputy DSL.
If a child is at immediate risk of harm, this must be followed up in person without delay.
Staff must record concerns using *My Concern / CPoms* and include:

- date, time and location
- who was present
- the exact words used by the child or others (no interpretation)
- the child's presentation (physical and emotional)
- details of behaviours causing concern and the context
- any relevant background information or previous incidents

Where injuries are observed:

- a **body map** must be completed
- injuries must be clearly described (size, shape, colour, position, number)

Using My Concern / CPoms

All staff have individual access to *My Concern* and must use it to report and update safeguarding concerns.
Key expectations:

- Concerns must be recorded promptly and accurately
- Staff must follow up concerns where necessary to ensure action has been taken
- Any immediate safeguarding risks must be escalated verbally as well as recorded
- Technical difficulties must be reported to a DSL immediately

Training on the use of the system will be provided as part of induction and refreshed annually.

Ongoing Monitoring
Where concerns are ongoing, staff may be required to contribute to monitoring a child's wellbeing.
All updates must be recorded ensuring a clear chronological record of:

- behavioural changes
- attendance patterns
- emotional presentation
- any further disclosures or concerns

Referrals and DSL Recording
The DSL is responsible for maintaining detailed records of:

- internal discussions
- conversations with the child
- discussions with parents/carers
- referrals to and communication with external agencies
- decisions made and the rationale for those decisions

Records must demonstrate clear professional judgement and evidence-based decision-making.
Where referrals are made, these will be confirmed in writing within required timescales.

Reports for Multi-Agency Meetings
Reports prepared for child protection conferences or core group meetings must:

- be factual, clear, and evidence-based
- focus on:
    - educational progress
    - attendance
    - behaviour and relationships
    - presentation and wellbeing
- avoid opinion unless clearly stated as professional judgement

Staff should be aware that reports may be shared with parents/carers and other agencies.
Information recorded may be used to support report writing and shared securely where appropriate.

APPENDIX 3: Brook Sexual Behaviours Traffic Light Tool

The following charts list specific examples of green, orange and red light behaviours at various ages. Take into account the age and ability level of the child or young person and others involved as well as the location, frequency and nature of the behaviour.

All behaviour must be considered in context.

0-4 years

• Comfortable being nude	• Touching, holding or fondling own genitals in preference to other activities	• Touching, holding or fondling own genitals of a persistent or compulsive nature or duration, which may also cause self-injury/harm
• Touching, holding or fondling own genitals	• Explicit sexual themes in talk, art or play	• Persistent and excessive explicit sexual themes in talk, art or play
• Growing awareness of own gender and gender of others, evidenced in language, art and play	• Continued interest in watching or following others into private spaces e.g. toilets, bathrooms to look at them or touch them, after redirection	• Persistently/compulsively touching the genitals/private parts of others
• Interest in body parts and functions	• Continued attempts to touch adults on the breasts, bottom, or genitals after redirection	• Forcing other children to play sexual games/engage in sexual activity
• Asking about or wanting to touch the breasts, bottoms or genitals of familiar adults e.g. when in the bath or shower	• Touching or wanting to touch the genitals/private parts of other children in preference to other activities	• Simulation of sexual touch or sexual activity
• Wanting to touch familiar children's genitals during play, toilet or bath times	• Pulling other children's pants down or skirts up against their will	• Sexual behaviour between young children involving penetration with objects, masturbation of others, oral sex
• Participation in games involving looking at and/or touching the bodies of familiar children e.g. "show me yours and I'll show you mine"	• Sudden increased interest in sexual behaviours	
	• Touching the genitals/private parts of animals after redirection	

5-7 years

- Increased sense of privacy about bodies
- Asserting boundaries around physical affection/touch with family members and peers
- Touching, holding or fondling own genitals
- Telling stories or asking questions, using 'toilet' words or names for private parts
- Curiosity about sexuality e.g., questions about babies, gender, relationships, and sexual activity
- Interest in bodies, private body parts and functions that is curious and light-heated
- Curiosity about other children's genitals e.g. playing games such as "show me yours and I'll show you mine"
- Mimicking or acting out adult relationships/observed behaviours in play e.g. pretending to have a boyfriend, girlfriend, or partner
- Mutual and enjoyable kissing or holding hands with known peers

- Persistent nudity and/or exposing private parts in public places
- Touching or fondling own genitals after redirection or in preference to other activities – that may be in public, with others, and/ or causing self-injury/harm
- Explicit sexual themes in talk, art or play
- Persistent questions about sexuality despite being answered
- Continued interest in touching or viewing other people's private body parts/private activities after redirection
- Touching or wanting to touch the genitals/private parts of other children in preference to other activities
- Playing or attempting to play "show me yours and I'll show you mine" games with significantly older or younger children
- Touching genitals/private parts of animals after redirection

- Rubbing own genitals on other people
- Touching, holding or fondling own genitals of a persistent or compulsive nature or duration e.g. to the exclusion of usual activities – that may be in public, seeking an audience, with others, and/or causing self-injury/harm
- Persistent and excessive explicit sexual themes in talk, art or play
- Sexual knowledge beyond that expected for age or stage of development
- Persistently/compulsively touching the genitals/private parts of others
- Forcing others to engage in sexual activity/play sexual games
- Forcing or coercing other children or young people to keep sexual activity secret, e.g. statements like "I won't be your friend if you tell"
- Simulation of sexual touch or sexual activity

8-12 years

- Growing need for privacy
- Asserting boundaries around physical affection/touch with family members and peers
- Exhibitionism amongst same age peers within the context of play e.g. occasional flashing or mooning
- Masturbation, with increasing awareness of privacy
- Use of sexual language that is playful and light-hearted
- Curiosity and seeking information about sexuality
- Interest in bodies, private parts and functions that is curious and light-hearted and respects the privacy of others
- Mutual and enjoyable hugging, kissing, touching, and flirting with *known* peers
- Interest and/or participation in a relationship with a peer of any gender

- Masturbation in preference to other activities – that may be in public, with others and/or causing self-injury/harm
- Persistent explicit talk, art or play which is sexual or sexually intimidating
- Accessing age restricted materials e.g. movies, games, internet with sexually explicit content
- Intentional viewing of other people's private body parts/private activities
- Mutual/self-masturbation with *known* and *unknown* peers
- Marked changes to behaviour e.g. mimicking older or adult flirting behaviours, seeking relationships with older children or adults in preference to peers
- Sudden increased interest in sexual behaviours
- Simulation of sexual activities e.g. oral sex and sexual intercourse with clothes on
- Hugging, kissing, touching, and flirting with *unknown* peers
- Playing games, online or in person, that have themes of sexual dominance or violence
- Using insults or name-calling related to a peer's sexuality or body

- Masturbation of a persistent or compulsive nature or duration e.g. to the exclusion of usual activities – that may be in public, seeking an audience, with others, and/ or causing self-injury/harm
- Persistently/compulsively touching the genitals/private parts of others
- Forcing or coercing others into sexual activity
- Sexual activity obtained in exchange for material items or privileges
- Forcing or coercing other children or young people to keep sexual activity secret, e.g. statements like "I won't be your friend if you tell"
- Participating in or simulating intercourse and/or oral sex with *known* or *unknown* peers with clothes off
- Sexual contact and activities with animals
- Sexual contact with others with a significant difference in age and/or developmental ability
- Degrading or humiliating self or others using sexual themes, either face-to face or online
- Ongoing sexual bullying e.g. removing clothing, explicit notes or messages
- Sharing or posting sexual images/videos with known or *unknown* people online

13-15 years

- Need for privacy
- Asserting boundaries around physical affection/touch with family members and peers
- Masturbation in private
- Sexually explicit, mutual conversations and use of humour with peers that is light-hearted
- Curiosity and seeking information about sexuality
- Searching for sexual health information online using age appropriate language (e.g. "what is safe sex?")
- Viewing age and developmentally appropriate materials for sexual arousal e.g. music videos and movies
- Mutually consenting sexual activity for pleasure, in private, with a partner of similar age/developmental ability
- Interest and/or participation in a romantic relationship with a person of any gender
- Flirting with peers, in person or online, in a way that respects personal boundaries and/or body language
- Mutually consenting sending of text-based(words) sexual messages for pleasure with someone of similar age/developmental ability
- Talking with friends about sexuality - e.g. crushes, dating, and sexual orientation - in a respectful and curious way

- Repeated exposure of private parts in a public place e.g. flashing
- Masturbation in preference to other activities – that may be in public, with others and/or causing self-injury/harm
- Posting or sharing sexual memes or jokes online with explicit or degrading themes
- Explicit communications, art or actions which are obscene or sexually intimidating
- Showing adult pornography to another child or young person
- Viewing age and developmentally inappropriate materials for sexual arousal e.g. those rated R 18+, and RX 18+.
- Sexual activity with a person of more than two years age difference, or with a significant difference in developmental ability
- Playing games, online or in person, that have themes of sexual dominance and/or violence
- Using body shaming or sexualised insults to assert power over peers
- Sexualised comments about others' bodies that are objectifying

- Masturbation of a persistent or compulsive nature or duration e.g. to the exclusion of usual activities – that may be in public, seeking an audience, with others, and/or causing self-injury/harm
- Preoccupation with sexually aggressive and/or illegal pornography
- Non-consensual viewing of others while they are engaged in sexual activity or nudity
- Forcing or coercing others into sexual activity
- Sexual activity obtained in exchange for material items or privileges
- Forcing or coercing other children or young people to keep sexual activity secret
- Sexual preoccupation which interferes with daily function
- Sexual contact and activities with animals
- Manipulating a partner into believing their sexual consent was implied or unnecessary
- Preoccupation with sexual activity that makes self and/or others feel ashamed or degraded
- Sexual harassment or bullying either in person or online e.g using sexual insults or threats
- Engaging others, online or in person, in a process to gain sexual gratification by using grooming techniques e.g. gifts, manipulation, lies
- Harassing or coercing others to take or send sexual images, videos or audio
- Deliberately sending or publishing sexual images, videos or audio of another person without their consent
- Creating, possessing, accessing or sending child sexual abuse materials

16-18 years

- Need for privacy
- Asserting boundaries around physical affection/touch with family members and peers
- Masturbation in private
- Sexually explicit, mutual conversations and/or use of humour and obscenities with peers
- Curiosity and seeking information about sexuality
- Searching for sexual health information online, using age appropriate language (e.g. "what is safe sex?")
- Viewing materials for sexual arousal e.g. music videos, magazines, movies Viewing materials for sexual arousal e.g. music videos, magazines, movies
- Mutually consenting sexual activity for pleasure, in private, with a partner of similar developmental ability
- Interest and/or participation in a romantic relationship with a person of any gender
- Mutually consenting sending of text-based (words) sexual messages for pleasure with someone of similar developmental ability
- Flirting with peers, in person or online, in a way that respects personal boundaries and/or body language
- Talking with friends about sexuality - e.g. crushes, dating, and sexual orientation - in a respectful and curious way

- Repeated exposure of private parts in a public place with peers e.g. flashing
- Masturbation in preference to other activities – that may be in public, with others and/ or causing self-injury/harm
- Posting or sharing sexual memes or jokes online with explicit or degrading themes
- Explicit communications, art or actions which are obscene or sexually intimidating
- Using body shaming or sexualised insults to assert power over peers
- Sexualised comments about others' bodies that are objectifying

- Masturbation of a persistent or compulsive nature or duration e.g. to the exclusion of usual activities – that may be in public, seeking an audience, with others, and/ or causing self-injury/harm
- Preoccupation with sexually aggressive and/or illegal pornography
- Preoccupation with sexual activity that makes self and/or others feel ashamed or degraded
- Sexual activity obtained in exchange for material items or privileges
- Sexual contact and activities with animals
- Non-consensual viewing of others while they are engaged in sexual activity or nudity
- Sexual preoccupation which interferes with daily function
- Forcing or manipulating others into sexual activity
- Engaging others in a process to gain sexual gratification by using grooming techniques e.g. gifts, manipulation, lies
- Creating, possessing, accessing or sending child sexual abuse materials
- Harassing or coercing others to take or send sexual images, videos or audio
- Deliberately sending or publishing sexual images, videos or audio of another person without their consent