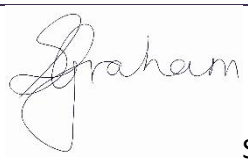
LUMEN CHRISTI CATHOLIC MULTI ACADEMY
SAFEGUARDING & CHILD PROTECTION POLICY

Lumen Christi Catholic Multi Academy's Safeguarding & Child Protection Policy is in line with the quality and standards expected from Birmingham City Council and will be monitored by *The Board of Directors.* This policy will also be reviewed annually or when new legislation requires changes, whichever is the soonest.

This policy is approved by the Board of Directors.

Date Approved/Approving Body:	28th July 2026, Board
Signed:	 Stephen Graham, Chair of the Board
Minuted:	Via Written Resolution, Hollie Parrish 28.7.26
Date of Next Review:	Autumn 2027

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1. Safeguarding Policy Statement

A whole-school, child-centred approach is fundamental to all aspects of everyday life at our school. At Lumen Christi Catholic Multi Academy we strive to create a culture which enables children to express their wishes and feelings and talk about anything that is of importance to them. We believe that every child deserves to receive an education within an environment where they feel safe to learn and develop. We want our pupils, staff, parents and carers to have confidence and trust in our goals and know that collaborative working is fundamental to create and maintain a child-centred approach to safeguarding.

In practice this means we endorse the key principle that the welfare of a child is paramount, keeping them at the centre of all decision making in our partnership working with them, their families, and those supporting them.

In line with our duties set out in the Children Act (1989, 2004) and Working Together to Safeguard Children (2026) we are committed to providing support and help as soon as possible, underpinned by our values that children are best looked after within their families, with their parents playing a full part in their lives where possible. We are also committed to ensuring that we work with agencies, including the Local Authority, to access support and targeted interventions for families when we consider that a child is, or may be, at risk of harm.

We hope that parents and carers will support us to undertake our statutory duties to offer early help support and to liaise with agencies to protect children who have suffered or otherwise likely to suffer significant harm without doing so. The core objective of early help support is to prevent any child from being harmed or placed at risk of harm and therefore halt any escalation where possible.

This policy outlines the commitment to our legal duties to safeguard children, the responsibilities for all our staff and the specific roles and responsibilities for our key Designated Safeguarding Leads and Governance.

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2. Important Safeguarding Contacts

School's In-House Contacts

Organisation / Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Natasha Mellor	n.mellor@stpeterc.bham.sch.uk 01214646921
Deputy Designated Safeguarding Lead (DDSL)	Ashleigh Luff	a.luff@stpeterc.bham.sch.uk 01214646921
Deputy Designated Safeguarding Lead (DDSL)	Amanda Kenny	a.kenny@stpeterc.bham.sch.uk 01214646921
Designated Teacher for Children in Care (DT for Children in Care)	Natasha Mellor	n.mellor@stpeterc.bham.sch.uk 01214646921
Special Educational Needs Coordinator (SENCO)	Ashleigh Luff	a.luff@stpeterc.bham.sch.uk 01214646921
Mental Health Lead	Amanda Kenny	a.kenny@stpeterc.bham.sch.uk 01214646921
DSL Prevent Lead	Natasha Mellor	n.mellor@stpeterc.bham.sch.uk 01214646921
Chair of School Standard Committee members	Named in local policies here.	**TBC**
Vice Chair of School Standard Committee members	Named in local policies here.	**TBC**
Link Safeguarding Committee member	Named in local policies here.	**TBC**
CEO (Lumen Christi)	Suzanne Horan	shoran@emmausmac.com
Chair of Board of Directors	TBC Sept 2026	
Head of HR & Safeguarding (Lumen Christi)	Hollie Parrish	07957 698 400 h.parrish@lumenchristi.org.uk

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Non School Contacts

Organisation / Role	Name	Contact details
Local Authority Designated Officer (LADO)	Duty LADO	Tel: 0121 675 1669 Email:ladoteam@birminghamchildrenstrust.co.uk
Birmingham Children's Trust	Children's Advice and Support Service (CASS)	○ Monday to Thursday: 8:45am to 5:15pm: • Friday: 8:45am to 4:15pm • Telephone: 0121 303 1888 ○ ○ CASS emergency out-of-hours: • Telephone: 0121 675 4806
Early Help		Early Help Support Team: Telephone: 0121 303 8117 or contact your Early Help District teams
NSPCC Helpline	N/A	Call: 0808 800 5000 Email help@NSPCC.org.uk.
Police	N/A	Emergency 999. Non-emergency 101

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3. Legislation and Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education 2026, the Crime and Policing Act 2026 changes to regulated activity, including the removal of the supervision exemption for certain volunteers and the Children's Wellbeing and Schools Act duties referenced in KCSIE 2026, including temporary accommodation notification duties, which sets out the legal duties that all schools and colleges in England must follow to safeguard and promote the welfare of children under the age of 18. Section 175 of the Education Act 2002, places a duty on schools and Local Authorities to safeguard and promote the welfare of pupils.
The School Staffing (England) Regulations 2009, which sets out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques.

Maintained schools governance guide - 7. Compliance - Guidance - GOV.UK (www.gov.uk) (2024) provides guidance for governing bodies on how to meet their legal and regulatory responsibilities with regards to compliance. It covers various aspects of compliance, including education, funding and finances, health and safety, inspections, political impartiality, protecting and sharing information, safeguarding and pupil welfare, pupil behaviour, school admissions, school attendance, schools causing concern, school complaints, length of school day and year, opening, closing or making organisation changes to a school, managing school premises, control and community use of school premises, school uniform, staffing and performance management, and whistleblowing.

This policy also meets requirements relating to safeguarding and welfare in the Statutory framework for the early years foundation stage for group and school providers (publishing.service.gov.uk)

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.

Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.

Academy trust governance guide - 7. Compliance - Guidance - GOV.UK (www.gov.uk) provides guidance for boards on how to meet their legal and regulatory responsibilities with regards to compliance. It covers various aspects of compliance, including admissions, attendance, complaints, education, funding and finances, health and safety, inspections, political impartiality, protecting and sharing information, safeguarding and pupil welfare, pupil behaviour, schools causing concern, school day and school year, management of academy premises, control and community use of academy premises, school uniform, staffing, and whistleblowing.

This guidance is a reference document for those involved in governance. It provides essential information from a range of sources on roles and legal responsibilities. The Academy Trust Handbook (ATH) and our funding agreement have more information on contractual requirements.

Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.

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Working Together to Safeguard Children statutory guidance outlines what organisations and agencies must and should do to help, protect and promote the welfare of all children and young people under the age of 18 in England

Birmingham Right Help, Right Time (Version 7, June 2026) provides the local multi-agency framework for identifying, assessing and responding to children and families according to their level of need. All staff, leaders and governors will use the Right Help, Right Time framework to support decision-making, early intervention, safeguarding assessments and referrals to external agencies. The framework promotes a child-centred approach, understanding the child's lived experience and ensuring that children receive the right help at the right time.

The Lead Safeguarding Partners for Birmingham Safeguarding Children Partnership are Birmingham City Council, West Midlands Police, NHS Birmingham and Solihull Integrated Care Board, working in close collaboration with Birmingham Children's Trust. They have a joint and equal duty to ensure multi-agency safeguarding arrangements are in place at a local level, and organisations and agencies are clear about how they will work together to safeguard children and promote the welfare of children.

Serious Crime Act 2015, Female Genital Mutilation Act 2003 which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk). All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism"

The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our school standard committee members and Principal should carefully consider how they are supporting their pupils regarding these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment

The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

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Working collaboratively as professionals is a key part of providing services to children and families. When professional disputes happen that cannot be resolved in a timely manner the BSCP Resolution and Escalation Protocol should be followed.

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4. Definitions: Safeguarding and Child Protection

All staff at Lumen Christi are expected to be familiar with the wide range of policies and procedures we have to keep our children safe and promote their wellbeing at all times.

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (2026) as:

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

Working Together to Safeguard Children (2026) further extends this definition and emphasises that safeguarding and promoting the welfare of children includes:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children by their parents, or otherwise within their wider family network through kinship arrangements, wherever this is safe, appropriate and in the child's best interests
- taking action to enable all children to achieve the best possible outcomes in line with the Children's Social Care National Framework.

Child/ren: The legal definition of a child in the UK includes everyone under the age of 18.

Right Help, Right Time: Right Help, Right Time (RHRT) is Birmingham's multi-agency threshold guidance which identifies four levels of need:

- Universal Needs
- Universal Plus Needs
- Additional Needs
- Complex/Significant Needs

The framework assists practitioners to identify concerns early, assess the impact on the child and determine the most appropriate support pathway, including school-led support, Early Help intervention, Family Connect requests and referrals to Children's Social Care.

Right Help, Right Time guidance document advises what support is available whatever the needs are of children young people and their families. It the framework and practice guide on how all individuals, agencies, partners and practitioners work together in Birmingham.

Lumen Christi recognises the Families First Partnership Programme and Birmingham's Family Help arrangements. Family Help combines targeted early help and section 17 Child in Need support, providing families with coordinated support through a single, family plan and multidisciplinary working arrangements. Staff will work collaboratively with universal services, community-based early help and targeted Family Help services to secure support for children and families at the earliest opportunity.

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Early Help means taking action to support a child, young person or their family early in the life of a problem, as soon as it emerges. It can be required at any stage in a child's life and applies to any problem or need that the family cannot deal with or meet on their own. Early Help Assessment and Our Family Plan - Birmingham Safeguarding Children Partnership

Child in Need: Under the Children Act 1989, local authorities are under a general duty to provide services for children in need for the purposes of safeguarding and promoting their welfare. A child in need is defined under section 17 of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired without the provision of services, or a child who is disabled. To fulfil this duty, practitioners undertake assessments of the needs of individual children, giving due regard to a child's age and understanding when determining what, if any, services to provide.

Child Protection: Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child who lives or is found in their area is suffering or is likely to suffer significant harm, it has a duty to make such enquiries as it considers necessary to decide whether to take any action to safeguard or promote the child's welfare. Such enquiries, supported by other organisations and agencies, as appropriate, should be initiated where there are concerns about all forms of abuse, neglect, and exploitation whether this is taking place in person or online, inside or outside of the child's home. There may be a need for immediate protection whilst an assessment or enquiries are carried out.

Schools are required to cooperate with children's social care when carrying their inquiries and therefore we have a duty to share information when requested to do so.

Nudes and semi-nudes: refers to the creation, sending or posting of nude or semi-nude images, videos or livestreams by young people under 18, including images that have been created, altered or generated through artificial intelligence technologies.

Significant Harm is the threshold for a child protection response to support and or protect children. Harm is defined in the Children Act 1989 as the ill-treatment of a child or the impairment of their health or development. This can include harm caused by seeing someone else being mistreated, for example by witnessing domestic abuse. The phrase 'significant harm' was introduced by the Children Act 1989. The Act does not define 'significant.' The question of whether or not harm is 'significant' relates to its impact on a child's health or development.

Children's Advice and Support Service (CASS) provides a single point of contact for professionals and members of the public who want to seek support or raise concerns about a child.

Multi Agency Safeguarding Hub (MASH) is a fully integrated multi-agency team which involves key safeguarding agencies including professionals from social care, police, health and education. These agencies work together to identify the need of children and their families and signpost to the appropriate agency or resources where threshold is met.

The main aim of a MASH is to improve the quality of information sharing when making decisions between agencies at the earliest opportunity.

Children in Care: A child is 'looked after' (in care) if they are in the care of the Local Authority for more than 24 hours. Children can be in care by agreement with parents or by order of a court. The placement providing the care can be a connected person to the child or a Local Authority approved foster carer.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When

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managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children and their parents and carers) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

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5. Equality Statement, Children with Protected Characteristics

Some children are at greater risk of harm, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. At Lumen Christi we are committed to anti-discriminatory practice and ensuring that all children are provided with the same protection regardless of any additional needs, barriers or protected characteristics they may have. As stated in the Equality Act 2010, we recognise the protected characteristics that may be applicable to our pupils:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

KCSIE 2026 strengthens the expectation that schools consider disproportionate vulnerabilities linked to protected characteristics and ensure safeguarding policies, procedures, record keeping and monitoring help identify and respond to sexual violence, sexual harassment, misogyny, misandry, racism, faith-based prejudice, homophobic, biphobic or transphobic bullying and other forms of harm.

All staff and volunteers understand the importance of recognising that a child may benefit from Early Help intervention, and it is integral to our whole school approach to look and listen out particularly for children:

- who have a special educational need and/or disabilities (SEND) or health conditions
- who could experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- who are young carers and may experience additional safeguarding, attendance, emotional wellbeing or educational risks arising from caring responsibilities.
- who have medical conditions that may create additional safeguarding vulnerabilities, affect attendance or increase barriers to seeking help
- who are pregnant or are young parents and may require safeguarding, welfare and educational support
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are in care or were previously in care (see Section 11)
- who have ongoing unexplainable and/or persistent absences from education
- whose parent/carer has expressed an intention to remove them from school to be provided with elective home education (EHE)
- who are becoming "out of sight of services", including those who are persistently absent, severely absent, excluded, electively home educated, not on roll or otherwise disengaged from universal service

Children with Special Educational Needs and Disabilities (SEND)

We know who our pupils are with special educational needs, disabilities, or additional health needs and recognise that they may face additional barriers, which can include:

- assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's impairment without further exploration

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- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- assumptions that children with SEND can be disproportionally impacted by things like bullying - without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
- reluctance to challenge carers (professionals may over-empathise with carers because of the perceived stress of caring for a disabled child)
- disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased
- a disabled child's understanding of abuse
- lack of choice/participation.

Children in Care (CiC)

The most common reason for a child to become looked after is as a result of abuse and/or neglect. We therefore ensure that the appropriate arrangements are in place to support these children and keep them safe from further harm. This includes:

- appointment of a Designated Teacher (DT) for Children in Care
- appropriate staff made aware of a child's looked after status
- ensure that necessary staff have the skills, knowledge and understanding of the child's needs
- ensure the child's record contains a clear understanding of their legal status and care arrangements, including the levels of authority delegated to their carer and contact arrangements with birth parents or those with parental responsibility
- keep contact details of the child's social worker, carer(s) and name and contact details of the virtual school head for DT to liaise with.

Gender Questioning Children

Lumen Christi recognises that some children who are gender questioning may experience bullying, discrimination, isolation or emotional distress. Staff will respond to concerns in a safeguarding-focused, child-centred manner, taking account of statutory guidance, parental involvement where appropriate and the individual needs of the child.

Where a child or parent/carer requests support relating to social transition, the school will not initiate action itself. Any request will be considered taking account of safeguarding duties, the welfare and best interests of the child and other children, parental involvement unless this would create greater risk, equality and human rights obligations, educational context and the need to document decisions and keep them under review.

Schools must not allow pupils access to toilets, changing rooms, showers or accommodation designated for the opposite biological sex. Alternative arrangements may be considered where appropriate, provided they do not compromise the privacy, dignity, comfort or safety of the child or others.

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6. Roles and Responsibilities of Staff including Leadership and Management

Role and Responsibilities of the Whole School

Safeguarding is **everyone's** responsibility at Lumen Christi. This policy applies to all of our staff including permanent, temporary and supply, volunteers, School Standard Committee members and contractors. It also applies to our safeguarding arrangements for extended school and off-site activities.

Lumen Christi Catholic Multi Academy plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour Policy
- pastoral support system
- planned programme of relationships, sex and health education (RSHE) in an age-appropriate way, which is inclusive and delivered regularly, tackling issues such as:
  - healthy and respectful relationships
  - boundaries and consent
  - stereotyping, prejudice, and equality
  - body confidence and self-esteem
  - how to recognise an abusive relationship (including coercive and controlling behaviour)
  - the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
  - what constitutes sexual harassment and sexual violence and why they are always unacceptable.

Role and Responsibility of all staff (permanent, temporary and supply), volunteers and contractors

All staff will be required to:

- Read at least annually, Part One of Keeping Children Safe in Education (2026) and any updates issued by the Department for Education. All staff, volunteers, Directors, School Standards Committee Representatives and regular contractors will read and understand Part One of Keeping Children Safe in Education. Lumen Christi will maintain records confirming this has been completed.
- Staff who work directly with children and school leaders should also read Annex A. The previous option for some staff to read Annex A instead of Part One no longer applies.
- access translated versions of Part One where required to support understanding.
- read Annex B of Keeping Children Safe in Education where directed by Lumen Christi as part of their role.
- sign confirmation that they have read the expected sections according to their role and understood their safeguarding responsibilities.
- promote and raise awareness of online safety when communicating with parents and carers.
- understand the safeguarding risks associated with emerging technologies, including AI, deepfakes, nudification applications and image-based abuse.
- contribute to creating a culture in which pupils who are lesbian, gay, bisexual or gender questioning feel safe, respected and able to share concerns and seek support.
- contribute to creating a culture for any child with a protected characteristic to speak out and share concerns.
- be familiar with Birmingham's Right Help, Right Time Framework and the four levels of need.
- understand the importance of the child's lived experience.
- exercise professional curiosity and respectfully explore concerns where information does not fully explain a child's presentation, behaviour, attendance or welfare.

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All staff will be aware of:

- our schools' safeguarding arrangements and systems which are explained to staff as part of their induction and annual update training. As part of staff induction new staff/ volunteers are provided with the following key guidance and information provided by our school senior leadership team:
  - Safeguarding & Child Protection Policy
  - Staff Behaviour Policy/Code of Conduct
  - the role and identity of the Designated Safeguarding Lead (DSL) and deputies
  - the Behaviour Policy
  - online safety policy (which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring).

- our expected safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- signs of vulnerabilities to look out for in children who may benefit from Early Help support, we explain to staff the Early Help process for children and their families and what their role is in this to support DSLs in ensuring children and their families receive support as soon as problems emerge
- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- the process for recording and sharing information internally to DSLs and on children's safeguarding records
- the process of making referrals to the Local Authority Children's Social Care and/or Police where required and the statutory processes that may follow
- the signs of specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines) *Keeping Children Safe in Education*
- how to support and speak to children when they may share their worries or make disclosures of abuse, neglect or exploitation and contribute to creating a culture where children feel able to speak with the relevant safeguarding leads
- the importance of reassuring children that they are being taken seriously and that they will be supported and kept safe
- the importance of supporting families and providing a culture of support to encourage parents/carers to seek support and engage with our school and professionals when issues emerge or become a concern
- children can be at risk of harm inside the home (familial harm) and outside of their home (extra familial harms) and that any form of harm can happen directly or online
- the fact that children who are (or who are perceived to be) lesbian, gay, bisexual (LGBTQ+) can be targeted by other children
- what to look for to identify children who need help or protection in accordance with statutory procures under the children act section 17 (child in need) and section 47 (significant harm).

Role and Responsibilities of the Designated Safeguarding Lead (DSL)

To ensure continuity of safeguarding responsibilities, the school will maintain robust cover arrangements when the DSL is unavailable through illness, leave or other absence. Safeguarding concerns must continue to be received, monitored and acted upon without delay. This may include use of CPOMS, safeguarding email systems, deputy DSL arrangements and Lumen Christi safeguarding support.

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Our DSL team includes a member/s of each school's senior leadership team. We also have Deputy DSLs (DDSL) within our staffing groups. Whilst one of the DSLs is referred to the 'lead' and will coordinate the DSL team, they are all trained at the same level to ensure that at all times one or more of them are available to carry out all of their designated functions in safeguarding.

The DSL takes lead responsibility for our school's child protection and wider safeguarding arrangements. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

Whilst all of our staff are part of our safeguarding culture, it is the role of our DSL to receive information, review and make decisions about any necessary further considerations or actions needed to respond to any safeguarding matters that arise.

The DSL will act as the main contact in our school when a child and their family are receiving support from the school, external agencies and statutory services.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Outside of school hours DSLs are contactable via email. During holidays inboxes will be checked daily

In the event that non-urgent matters arise out of school hours, schools, in their local policy will outline how the DSL can be contacted, if necessary (*e.g. email, phone and underline in bold*).

The DSL will be given the time, funding, training, resources and support to:

- provide advice and support to other staff on child welfare and child protection matters
- take part in and/or lead early help support
- take part in strategy discussions organised by the Local Authority's Children's Social Care and inter-agency meetings and/or support other staff to do so when required
- contribute to the assessment of children (when a child may have suffered harm or is at risk of harm)
- refer suspected cases, as appropriate, to the relevant body (Local Authority Children's Social Care, Channel Programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly
- have a good understanding of behaviours that may impact on a child's engagement and learning that may require consideration through safety/support planning, this includes the impact on themselves but also to other children
- have a good understanding of harmful behaviours that may require risk management, safety planning and/or support in school, this includes those presented by children within the setting, their parents/carer or associated adults where necessary
- have a good understanding of the filtering and monitoring systems and processes in place at our school
- assist the Principal to review and respond to low-level concerns that may arise regarding staff
- share information and/or take part in statutory processes that involve reviewing and analysing of safeguarding practice and policies. This can include meetings held by Birmingham Safeguarding Children's Partnership in response to significant safeguarding incidences, child death and/or where a safeguarding practice review is required to determine learning and practice analysis.

The DSL will also:

- keep the Principal informed of any issues, the conversations with children and their families, universal services and referrals to external agencies and statutory services

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- liaise with universal, targeted and statutory agencies, Local Authority workers (Children's Services and other key practitioners) when there are safeguarding concerns as appropriate (including early help and child protection)
- share information about incidences of sexual violence and sexual harassment with statutory colleagues such as Police and Children's Social Care colleagues in order to prepare and implement the school's policies
- be confident about what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment
- be aware that children are entitled to have an 'Appropriate Adult' to support and help them in Police investigations or if there is threshold met for them to be searched.
- ensure that safeguarding decisions, early help arrangements and referrals are informed by Birmingham's Right Help, Right Time framework and the child's lived experience.
- utilise Birmingham screening tools where appropriate, including the Birmingham Neglect Screening Tool and the Combined Exploitation Screening Tool.
- consider the risks for children who may be becoming "out of sight of services", including those experiencing severe absence, exclusion, elective home education or disengagement from universal services.

Lumen Christi will ensure appropriate DSL and Deputy DSL availability, including contingency arrangements during absence periods, educational visits and other activities, so that safeguarding advice and decision-making can be accessed without unnecessary delay.

Role and Responsibilities of the Governance

Our Board have a strategic role within our leadership and management team and must ensure that all staff comply with legislation and local guidance at all times.

The Board will:

- facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development for the setting
- evaluate and approve this safeguarding and child protection policy along with other policies related to safeguarding at each review, ensuring they comply with the law, and hold the Principal to account for their implementation
- evaluate and approve recommendations/action plans identified through quality assurance activity that the Principal/DSL undertakes to review safeguarding practice through audits and annual/termly governing reports to ensure that they have regular oversight and hold the Principal accountable for the practice improvement
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- appoint a link governor to monitor the effectiveness of the school's safeguarding arrangements including policies and their implementation, in conjunction with the full governing body. This is always a different person from the DSL
- ensure all staff undergo safeguarding and child protection training, including online safety according to their roles, and that such training is regularly updated and in line with statutory guidance.
- ensure that all school standard committee members/Directors:
  - read Keeping Children Safe in Education in its entirety, and review compliance of this task at least annually
  - sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance.
  - ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:

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  - making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - reviewing the DfE's filtering and monitoring standards and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

- receive assurance that safeguarding practice across Lumen Christi is aligned to Birmingham's Right Help, Right Time framework and that children receive support at the appropriate level of need.
- monitor safeguarding trends including attendance, severe absence, exclusion, elective home education, children missing education, exploitation risks and children becoming "out of sight of services
- The Board will ensure filtering and monitoring systems are reviewed at least annually and that records of review, challenge and actions taken are maintained. School Standards Committees will seek assurance that filtering and monitoring arrangements remain effective and proportionate to risk

The School Standards Committees will make sure:

- the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- the DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- the school has effective procedures to manage any safeguarding concerns (no matter how small) that arise. This includes those related to child welfare concerns, low level concerns and allegations made against staff
- that this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- where another body is providing services or activities on the school site (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed
  - make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.

- ensure appropriate safeguarding arrangements are in place for children with medical conditions who may experience increased vulnerability or barriers to accessing support.
- make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- Schools in their local policy to add a link to their Lettings policy
- the Chair of School Standard Committee members will act as the 'case manager' in the event that an allegation is made against the Principal where appropriate (see Section 11 Managing Concerns and Allegations)

Role and Responsibilities of the Principal/Principal

The Principal will:

- implement this policy and ensure that all staff:
  - are informed of our school's systems which support safeguarding, including reading and understanding this policy, as part of their induction

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  - follow the procedures included in this policy, what they should know and do in relation to information sharing and referrals of cases of suspected abuse and neglect
- make this policy available to parents/carers, professionals and the community to ensure there is transparency and clear expectations about the school's duty to safeguard and promote the welfare of children and the arrangements for responding to children presenting with needs that may require early help or support to protect them. The local policy will be available on each school's website. Paper copies are available on request.
- ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- act as the 'case manager' representing the school in the event of an allegation of abuse made against another member of staff or volunteer managing cases where there are low-level concerns regarding the conduct of staff, or oversee delegation to the DSL
- ensure the relevant staffing ratios are met, where applicable
- make sure each child in the Early Years Foundation Stage is assigned a key person
- overseeing the safe use of technology, mobile phones and cameras in Early Years setting

Role and Responsibilities of the Designated Teacher

Our Designated Teacher takes leadership of promoting the educational attainment of Children With a Social Worker which includes:

- working closely with Virtual School Heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans
- to carry out their duties in line with Designated teacher for looked-after and previously looked-after children - GOV.UK and extended duties as outlined Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK working closely with our DSL for those children who are supported by a Child in Need or Child Protection Plan to ensure support for the education attainment of these children is appropriately entwinned with safeguarding processes.

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7. Working with Families

Alongside Keeping Children Safe in Education Lumen Christi adopts the fundamental principal of ***working in a child-centred approach within a whole family focus*** as promoted in Working Together to Safeguard Children 2026.

This principle is underpinned by the findings and recommendations within the Government's 2023 publication Stable Homes, Built on Love in response to the recommendations of the Independent Review of Children's Social Care. The strategy sets out how children's social care is to be committed to supporting every child to grow up in a safe, stable and loving home. For most children this means growing up within their family. The strategy also emphasises the importance of having stronger expectations of support through early help and family networks.

At Lumen Christi we are committed to understanding the lived experience of children and families. In assessing risk, need and support, practitioners will consider not only the presenting concern but also how the child's everyday experiences, relationships, attendance, engagement, wellbeing and safety are being affected. The child's voice wishes and feelings will remain central to all safeguarding decision-making.

Our principles align to the above. We endeavour to work in partnership and collaboration with children and their families so that they are supported from an early stage by being a part of and leading the conversations about change and aims for their children. We are keen to support families in a strength and solution-based approach, encouraging motivation and confidence to improve their own agency to make safe and positive decisions for themselves and their children.

Our principles include, but are not limited to:
Promoting effective partnership working with parents and carers e.g. build strong, positive, trusting, and co-operative relationships by:

- approaching families and their wider family networks and communities with empathy, respect, compassion, and creativity
- avoiding reinforcing family shame, suffering, and blame
- making efforts to understand the impact of the parental trauma influencing the dynamics and experiences of the family
- using strength-based approaches, working with parents and carers to identify what is working well and how their strengths could support them to effect positive change
- ensuring we work sensitively with parents, carers, and children, to identify and understand the impact of adversity and trauma in their lives; seeking to understand how adversity and trauma might manifest and affect children and parent's engagement and use their expertise to adapt their response with care and compassion
- adapting our responses to meet the diverse needs of parents and carers, including fathers and male carers, and the specific challenges being faced, including parents and carers of disabled children, and where harm is outside the home
- ensuring we understand the family's background, ethnicity, religion, financial situation, ability, education, sex, ages and sexual orientation, and potential barriers these create in seeking and accessing help and support
- being alert and recognising where parents or carers may not be acting in the best interest of the child or where children may be experiencing abuse, neglect, and exploitation as a result of actions by parents, carers, or other individuals in their lives. Practitioners use their skills and expertise to adapt their response to secure engagement

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- being mindful of negative stereotypes when making decisions which might lead to false assumptions.

Communicating effectively verbally and non-verbally by:

- communicating with respect, being clear, curious and inclusive; adapting to parent's and carer's needs
- providing materials to children, parents, carers, and families which are jargon free, developmentally appropriate and in a format that is easily understood
- ensuring any materials, such as minutes or reports, capture the school's contribution but also those from the children, parents and carers which must include their views and wishes
- supporting families to access support to translate information where English is not their first language. Our school will access interpreters where needed including British Sign Language.

Empowering our parents and carers to participate in decision-making to help, support and protect children by:

- creating a safe culture which is an open and accepting forum free from discriminatory or prejudicial judgements
- ensuring the open culture is one which still provides reflection and challenge where the information has the potential to be a risk or influencing factor which may impact on a child's safety and wellbeing
- asking families for their perspective on a situation or issue that arises, ensuring we consider their point of view and factor this in when thinking about support
- promote families' rights to support through use of advocates, family members or a supporter
- ensuring parents and carers are fully aware of who will attend meetings and discussions, if the child will be invited to participate, and the format of the meeting or discussion
- giving parents and carers adequate preparation at every stage, relevant information, a safe and appropriate environment for participation, and suitable access arrangements
- signposting parents and carers to sources of help and support available locally or through the Local Authority
- provide opportunities for feedback and review to ensure acknowledgement of positive progress but also reviewing and discussion of any new or increasing issues to readapt a family's plans
- being transparent about our concerns and why we may need to request support from an outside agency; and the potential actions should our concerns increase for the children
- helping parents and carers to understand what the issues are and how this impact on the child, what decisions could be made, what changes need to be made, why and how, timescales and possible outcomes
- providing information about different types of support, what it involves and expects from parents and carers so they can make an informed choice and decision about which support pathways will be more helpful and effective for them.

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8. Confidentiality and Sharing Information

Trusted relationships are at the heart of working with children and their families at Lumen Christi. We strive to uphold good practice and work in partnership with children and families, communicating effectively and listening well so that we have sufficient information to understand and be able to meet their needs.

An open culture is imperative when deciding whether to share information and it is important to get the lawful basis right. The legal framework can appear complex, and a lack of clarity can lead practitioners to assume, incorrectly, that no information can be shared because consent has not been provided. Our school understands the lawful basis in which our DSLs can share information with other people, agencies and organisations about the children and families we are supporting.

In line with our principles of working with families outlined above, we strive to be transparent, open and clear when we need to discuss any information or concerns that worry us about a child's wellbeing. If we feel that we need to share information, we will explain how information will be shared or used so that families can make an informed choice about whether to consent.

If we feel that we need to share information with services due to concerns about a child's safety or welfare to provide the family with specific support, we will be upfront, transparent and honest about our concerns and the ways in which such services could help the family. We will endeavour to support and encourage the family to consent and engage with such support. We believe that this collaborative approach will support children to have the confidence to speak up and share their views as well as encouraging parents and carers of children at our school to have a willingness to engage with services that provide support.

If we have a concern about a child's safety and have decided to share information to protect them from a risk of harm, we will endeavour to gain cooperation and understanding from parents and carers. We will strive where possible to always gain consent and where we believe our concerns have increased and warrant the sharing of information to statutory services such as Police and Children's Social Care, we will have made efforts to discuss, explore and provide support to address these with families in a collaborative way beforehand; concerns should not be a surprise to families unless in situations where a one off or unprecedented incident occurs.

However, for a small number of children, seeking parental consent is not always possible and may place a child or others at risk of harm, for example:

- the child would be placed at increased risk of significant harm through the action of gaining this consent
- there would be an impact on a criminal investigation
- a delay in making the referral would impact on the immediate safety of the child.

In situations where our professional or legal duty is exercised to share certain information in the absence of consent, we will inform them as soon as possible if it is safe and appropriate to do so. We will be clear about what we have shared, with whom, the reasons why and how the information will be used.

In any situation where a child or their parent/carer object to consent or particular information sharing and we decide that it is proportionate to do so, a clear rationale, outlining our decisions and the reasons why, will be recorded on the child's file.

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In situations where there are allegations of child-on-child abuse, we will notify the parents or carers of all the children involved. If a child or group of children have suffered significant harm or are considered at risk of harm either directly or online, we will have a duty to consider making a referral to Children's Social Care and the Police if a crime has been committed. The process for this can be found in Section 9 and our principles for information sharing and consent will apply unless we have a legal obligation to report the incident.

In addition to sharing information, our DSLs will endeavour to arrange a meeting with the parents and carers of all children to share information about the incident, plan safety strategies and/or risk management plans. Our DSLs will endeavour to keep families up to date and provide reassurance on any measures being taken, whilst respecting the privacy of each individual child involved.

The Data Protection Act (DPA) 2018 does not prevent or limit the sharing of information for the purposes of keeping children safe. Lumen Christi recognises that timely information sharing is essential for effective safeguarding. Whilst we promote collaboration and partnership with our families, fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children when required.

The safety and welfare of the child takes precedence over issues of confidentiality. Staff should be aware that parental consent is not required to share information where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Information sharing decisions will be lawful, proportionate, necessary, relevant and recorded appropriately.

The following principles apply to Lumen Christi's *confidentiality* agreement:

- timely information sharing is essential to effective safeguarding.
- the Data Protection Act (DPA) 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe
- if staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- if a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the Data Protection Act that applies
  - the DSL will have to balance the victim's wishes against their duty to protect the victim and other children
  - the DSL should consider the following points:
    - parents or carers should normally be informed (unless this would put the child at greater risk)
    - the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to Children's Social Care where the child resides
    - where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the Police remains.

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- regarding anonymity, all staff will:
  - be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
  - consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
  - have regard for the Government's publication Information sharing advice for safeguarding practitioners - GOV.UK includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information with all relevant parties.

- If staff are in any doubt about sharing information, they can seek advice from our Principal, DSL or any person in a position of senior leadership or wider DSL team.

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9. Recognise and Respond to Abuse, Neglect and Exploitation (what all staff must know and do if they have concerns)

Abuse, neglect and exploitation
All our staff are aware of what abuse, neglect and exploitation is and have an understanding of the different types of indicators as outlined in Appendix 3 which could suggest a child is suffering or likely to suffer harm.

We encourage our staff to be professionally curious about what to look out for as this is vital for the early identification of abuse, neglect and exploitation so that we are able to identify children who may be in need of help or protection at the earliest opportunity.

Staff must remain professionally curious and not accept explanations at face value where there are indicators of abuse, neglect, exploitation or vulnerability. Staff should seek clarification, discuss concerns with safeguarding leads and consider whether a child's lived experience indicates emerging or escalating risk.

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

Our staff are aware that children may be abused by an adult or adults or by another child or children.

Physical Abuse
Physical abuse is a form of abuse which may involve:

- hitting
- shaking
- throwing
- poisoning
- burning or scalding
- drowning
- suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (Fabricated Induced Illness FII).

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

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and

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limitation of exploration and learning or preventing the child from participating in normal social interaction
- a child seeing or hearing the ill-treatment of another
- serious bullying (including cyberbullying)
- causing a child to feel frightened or in danger
- exploitation or corruption of children.
- persistent verbal abuse, humiliation, criticism, belittling, rejection, intimidation or other behaviour which adversely impacts a child's emotional development and wellbeing.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It can be difficult to recognise emotional abuse, and children may not always realise they are experiencing it. However, there may be indicators in the way a child behaves and reacts to certain situations.

Sexual Abuse
Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:
- **Physical contact:** including assault by penetration assault by penetration, including rape or penetration with an object, or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing
- **Non-contact activities:** such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse
- **Online abuse:** sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

Neglect
Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Exploitation
Exploitation in relation to children refers to the use of children for someone else's advantage, gratification, or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.

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Our staff are aware that there are several types of child exploitation, including, but not limited to:

- **Child Sexual Exploitation (CSE):** this is a type of sexual abuse where children are sexually exploited for money, power, or status. It can involve contact and non-contact activities and can occur without the child's immediate recognition; this is due to their grooming by the abuser.
- **Child Labour Exploitation:** this involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential, and dignity.
- **Child Trafficking:** children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities.
- **Child Criminal Exploitation (CCE):** this is where children are involved in activities of a criminal nature, often in gangs. They may be forced or manipulated into committing crimes, such as selling drugs or stealing.

Safeguarding Issues and Specific Forms of Abuse

All our staff understand that children can be at risk of abuse or exploitation in situations outside their families. They are aware that extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), drug taking and/or alcohol misuse, criminal exploitation, child sexual exploitation, serious youth violence, county lines, radicalisation, consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth produced sexual imagery) and can put children in danger.

Staff are aware that Extra Familial Harms can present online, in a child's environment/neighbourhood, school and any place/space that children occupy or access such as:

- Child abduction
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Children and the Court system
- Children absent from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Preventing radicalization
- The Prevent Duty
- Channel
- Sexual violence and Sexual harassment between children in schools
- Serious Violence
- FGM and the mandatory reporting duty for teachers
- Forced marriage.
- Financial exploitation, including coercion or manipulation of children to obtain money, goods, online assets, financial services or criminal proceeds.

Child-on-Child Abuse

At Lumen Christi we know that children can cause harm to other children. As a school we have a zero acceptance of child-on-child abuse and create a culture of keeping an open mind and attitude that "it

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could happen here." Our staff are aware that even if no reports are being made in our school, it does not mean it is not happening.

Child-on-child abuse is a safeguarding issue for both the victim and the child displaying the behaviour. The school will seek to understand and respond to the needs of both children and prevent escalation wherever possible.

Our staff understand that it is important to challenge inappropriate behaviours between children that are abusive in nature, and we have clear expectations that incidents are not downplayed or suggested to be jovial or part of growing up as this can lead to a culture of unacceptable behaviours and unsafe environments for children and young people.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Concerns about child-on-child abuse

In most circumstances, incidences of pupils hurting other pupils will be dealt with under each school's local behaviour policy. Our safeguarding and child protection policy will apply to all incidents that raise safeguarding concerns where the alleged behaviour:

- is serious, and potentially a criminal offence
- could put pupils in the school at risk
- is violent
- involves pupils being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including consensual and non-consensual creation, possession or sharing of nude and semi-nude images, including images that have been digitally altered, manipulated or generated through artificial intelligence technologies.)

If a pupil makes an allegation of abuse against another pupil:

- staff must record the allegation. Schools in their local policy to add specific details depending on their system and incorporate any paper-based arrangements for support staff e.g. lunchtime supervisors and report to the DSL, staff should not investigate the matter
- the DSL will assess and consider the relevant next steps which may include, speaking with the child and parents, accessing relevant consultation lines provided to schools by the Local Authority,

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making a request for support to Children's Services as well as the Police if the allegation involves a potential criminal offence or the Child and Adolescent Mental Health Service (CAMHS), if appropriate

- the DSL will consider whether a risk assessment or a safety and support plan would be beneficial for any children involved, including the victim(s), the child(ren) against whom the allegation has been made and any others affected, with a named person they can talk to if needed. This should include consideration of all aspects and areas of the school environment and beyond, for example off-site activities and school transport
- the DSL will speak to the child and their parent/s or carers to share the concerns, gain their views and consent to liaise with other agencies if there are any identified risks and unmet needs
- if the incident is a criminal offence school have a duty to report this and thereafter work closely with the Police (and other agencies as required) while protecting children and/or taking any measures to manage risk. For incidences which involve significant harm and/or a potential criminal offence, the DSL will endeavour to gain consent but may override this should not gaining consent increase the risk to a child
- our DSLs are committed to ensuring that where concerns are raised about child-on-child abuse, incidences are taken seriously and dealt with fairly. DSLs will consider all information available to them and ensure that any action or decision is proportionate for all children involved, and that such decisions do not disproportionately impact on their access to education, although at times some restrictions or adaptations may be required to manage identified risk.
- Safety plans and advice from the Local Authority will be considered and if required actioned.

Creating a culture where children feel safe in school and minimising the risk of all forms of abuse.
We recognise the importance of taking proactive action to minimise the risk of any form of abuse, neglect and exploitation irrespective of from whom and where this comes from, including child-on-child abuse. Creating a supportive environment where children can feel confident in reporting incidents is key to our safeguarding culture in Lumen Christi.

We expect all staff to:

- challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- be vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- ensure pupils are able to easily and confidently report abuse using our reporting systems (schools in their local policy to add any specific information here or processes they have for children to share or report concerns)
- reassure victims that they are being taken seriously
- be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems in the school or elsewhere that could be addressed by us updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with our safeguarding partners
- support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, and alleged perpetrator(s) and any witnesses are not bullied or harassed
- consider intra-familial harms (adults close to the child and family) and any necessary support for siblings following a report of sexual violence and/or harassment.

Our staff are trained to understand:

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- How to recognise the signs of child-on-child abuse, and know how to identify it and respond to reports
- even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an open mind and attitude of "it could happen here"
- If they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told; and always speak to the DSL should they be unclear
- children may not always make a direct disclosure and therefore they must be aware that:
  - children can show signs or act in ways they hope adults will notice and react to; it may be that their difficulties emerge from behaviour when they do not have the language to express themselves
  - A friend of the child may share information with a staff member or make comments; professionally curiosity is key, do not fear exploring the information and asking open-ended questions
  - staff overhear a conversation between children
  - A child's behaviour may change suddenly with no clear reason or precipitating event that might offer some explanation
  - some children can face additional barriers to telling someone, for example they have a disability, special educational need, age gender, ethnicity and/or sexual orientation etc.
  - one child's concerning/abusive behaviour towards another could be an indicator of that child having been harmed themselves.

Children Displaying Harmful Behaviours

Lumen Christi recognises that children who display harmful, abusive or inappropriate behaviour may themselves be vulnerable, have unmet needs or be experiencing abuse, neglect or exploitation. Safeguarding responses will therefore consider the needs of both the victim and the child displaying the behaviour.

Children Missing Education/Absent

Absence from education can be an indicator of abuse, neglect, exploitation, criminal exploitation, sexual exploitation, mental health concerns, risk of radicalisation or other unmet need. Attendance concerns will never be treated solely as an attendance matter and will always be considered through a safeguarding lens.

Modern Slavery

Staff should recognise that child criminal exploitation, child sexual exploitation, trafficking and some forms of organised abuse may constitute modern slavery and may require referral through the National Referral Mechanism where appropriate

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. They may also experience it within their own intimate relationships.

Our staff understand that these experiences can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

Our staff are aware that domestic abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse and that anyone can be a victim of

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domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Staff should be aware that domestic abuse may also include child-to-parent or child-to-carer abuse. Such behaviour may indicate safeguarding needs for both the child and family members and should be assessed through safeguarding procedures.

The school participates in Operation Encompass. In accordance with KCSIE 2026, police have a statutory duty to notify schools where they have reasonable grounds to believe that a child may be a victim of domestic abuse. The Designated Safeguarding Lead or nominated Key Adult will review notifications and determine what support should be offered to the child.

Female Genital Mutilation (FGM)
Keeping Children Safe in Education (2026) explains that FGM includes 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.'

FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as 'female genital cutting,' 'circumcision' or 'initiation.'

Our teachers are aware of their mandatory reporting duty and the requirement to immediately contact the Police if they are

- informed by a girl under 18 that an act of FGM has been carried out on her
- observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 (and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth).

The duty for teachers above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, teachers know they must report to the DSL who will follow local safeguarding procedures.

Our members of staff who are not teachers, are aware that if they suspect a child is at risk or that FGM has been carried out, they should report this to the DSL immediately.

Serious Violence
Staff should be aware of indicators which may signal children are at risk from, or involved in, serious violence. These indicators may include:

- increased absence
- change in peer relationships
- experience of exclusion
- carrying weapons
- unexplained injuries
- involvement with gangs
- criminal exploitation

Concerns relating to carrying, possessing, threatening with or using weapons must be reported immediately to the DSL. The DSL will consider whether a risk assessment and safety plan are required.

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Prevent and concerns about extremism
Lumen Christi is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of our functions, to have "*due regard to the need to prevent people from becoming terrorists or supporting terrorism*" (known as the Prevent duty).

The Prevent duty is one of our wider safeguarding obligations. Our DSLs and senior leaders are aware of the revised Prevent duty guidance: England and Wales (2023) for England and Wales, especially paragraphs 141-210, which focus on education and childcare. The guidance covers 3 general themes: leadership and partnership, capabilities, and reducing permissive environments.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to Children's Services or Channel, the Government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which all staff and school standard committee members can call to raise concerns about extremism for a pupil. In non-emergency situations DSLs can also email counter.extremism@education.gov.uk. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

Concerns about mental health
Mental health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Poor or deteriorating mental health can also be a safeguarding concern in its own right. Our staff know to be alert to behavioural signs that suggest a child may be experiencing mental health or be at risk of developing one.

If a staff member has a concern about a child's mental health, no matter the level of the child's emotional difficulties, they must speak to the school's DSL who will evaluate if the child is at risk of immediate harm, and if so, will escalate to the appropriate level of support which includes speaking to the school lead for Mental Health.

If a child is experiencing low moods, low self-esteem and general anxiety, our school mental health lead will be able to provide some advice about some self-accessed support through relevant approved wellbeing websites and apps. If, however, the child is presenting with a concerning level of low mood and anxiety for a period of time then our mental health lead in partnership with the DSL will discuss with the child and their parents/carer to explore options of support.

If someone is experiencing suicidal thoughts but they do not need physical input from A&E, then consideration will be given to accessing support from the SPA/Crisis team. If a referral for targeted mental health support is required, then a referral through SPA will be made.

If, however, a child/young person is at immediate risk the school will recommend they need to be sent to A&E or dial 999. Where urgent mental health support is required but the situation is not an emergency, NHS 111 should be contacted.

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At Lumen Christi we adopt a whole school approach and safeguarding is everyone's responsibility. Staff and volunteers, and School Standard Committee members must comply with our safeguarding procedures as set out below:

If a child makes a disclosure to a member of staff or volunteer
All staff are aware they should always be prepared as children can disclose spontaneously to anyone anywhere.

Lumen Christi is situated within Birmingham which has a rich and diverse population. We cannot, and do not, assume that all children and their families have the ability, understanding, language and resilience to convey any difficulties they may experience. It is key to our school ethos to recognise the needs of children and their families and to recognise and provide support where English may not be their first language and/or the children or family members have special educational needs; and without doing so may impede their ability to represent their voice, wishes and feelings.

All staff know that we place the voice of children at the centre of everything we do and endeavour to place their best interests at heart. We ensure we know who our children are, staff are encouraged to be curious by speaking and listening to children whilst respecting any protected characteristics. We hope our children have confidence and trust in our staff, believing they will be taken seriously and be supported with their issues or concerns sensitively.

Staff also know that children may not always feel ready or know how to tell someone that they are being abused, neglected or exploited and do not always recognise their experiences as harmful.

We listen to children by:
- showing patience regardless of a child's age as we know they can find it hard to find the words to express themselves
- encouraging children to tell their story in their own words
- avoiding the use of leading questions or suggesting what may have happened, instead we maintain genuine curiosity, and only ask open-ended questions / prompts.

We reassure children by:

- making sure a child does not feel they are in trouble and that they have done the right thing in speaking to staff
- we let a child know it is not their fault as children are often made to feel blame by those harming them
- never promising confidentiality and being transparent about our obligations to share information if we are concerned that they are at risk of harm
- helping children to understand how we plan to support them and their family and let them know what action we will need to take next to support them.

Recording concerns
Our staff know that reporting concerns is a procedural requirement when safeguarding and promoting the welfare of children. Our staff are clear that they must:
- record all conversations relating to any level of concerns on our recording systems; ensuring that the record is as detailed as possible, is factual, does not contain assumptions or personal judgement and captures the child's account in their own words
- inform the DSL about their concern as soon as possible; where the concern involves a disclosure or concern that the child is at risk of harm they must inform the DSL immediately.

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- Recordings will be made on the school's CPOMS platform

Our staff are aware that such information is confidential and should be shared with the DSL only who may hold additional information about the child and their family and therefore can form a view on its significance and whether any action is required. Staff will not share information amongst themselves and will not share the information outside of the formal reporting process unless asked to by the DSL. This ensures that information is shared without delay enabling the DSL to carry out any necessary functions of their role whilst upholding confidentiality for the child and their family.

What school and college staff should do if they have concerns about a child
Lumen Christi is committed to ensuring that all children feel safe and comfortable to share and report any concerns and/or allegations about their personal experiences at home, in the community, online or regarding a member of staff or other children in the school. As outlined above, all our staff are clear on the importance of listening to and supporting children when making disclosures, and the need to reassure them.

Our staff are aware that children can share information with anyone in our school but there are clear reporting processes when such information sharing raises concern about their welfare. Children may talk about worries and anxieties around friendships and school life which they need to support with but on other occasions they may share information about their family life which indicates that the children and their family may be in need of help and/or fear or experiences which cause staff to be concerned about whether they have been harmed or are at risk of being harmed. Where such situation arises, our staff are clear on the reporting processes.

Any member of staff, including supply teachers, contract workers, volunteers, school standard committee members/trustees and visitors at Lumen Christi who has any concerns about a child's welfare should:

- maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the best interests of the child. Never promise a child confidentiality
- reassure the child they have done nothing wrong and if appropriate explain to them how they will be supported and who you will need to share information with
- record what the child or others have disclosed using their language - or describe what you have seen or suspect and your rational for this. Also ensure you make a note of any injuries observed or described by the child (*if it is the latter two*)
- consider if the child needs medical attention and if so, prioritise ensuring they receive this
- you must never delay reporting your concerns about the welfare of a child and always act immediately by reporting/speaking to the school's DSL/deputies
- record what the child or other has disclosed in their language or describe what you have seen or suspect and your rational for this (*if it is the latter two*)

The DSL or deputy will:

- assess concerns using Birmingham's Right Help, Right Time framework. This will include consideration of:
  - the child's lived experience
  - protective factors and family strengths
  - indicators of abuse, neglect or exploitation
  - attendance, exclusion and engagement with education
  - online risks and vulnerabilities
  - whether the child is becoming "out of sight of services"
  - the level of need identified within the RHRT framework.

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- determine the most appropriate response which may include:
  - school-based support
  - Early Help Assessment and Our Family Plan – inline with the Pathfinder approach
  - Family Connect referral
  - consultation with targeted support services
  - referral to CASS
  - immediate safeguarding intervention where significant harm is suspected.

- DSL or deputy will speak to the child to verify their wishes and feelings, contact the child's parents or carers to either inform them of the concerns and also to gauge their view (it will be at the discretion of the DSL team to carefully consider if this action may place a child at further risk, e.g. if the child has disclosed abuse and neglect caused in the family home)

- if it is immediately apparent that a child has suffered significant harm or is at risk of harm e.g. suffered abuse, neglect and/or exploitation, the school's DSL will make a referral to Children's Social Care to request support at the earliest opportunity; consent will be gained where appropriate. If there has been a crime committed within the circumstances of the abuse, they will also report this to the Police.

What will the Local Authority Children's Social Care do?
Within one working day of a referral being made, a social worker should acknowledge its receipt to the school's DSL and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required
- any services are required by the child and family and what type of services
- the child is in need and should be assessed under section 17 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process
- further specialist assessments are required to help the Local Authority to decide what further action to take
- the DSL or deputies should follow up if this information is not forthcoming.

Anyone working/volunteering with children can make a referral, if in an emergency staff are unable to locate or do not have time to inform DSL of a serious concern, the following process must be followed without delay.

Making a referral to Children's Services and/or requesting support
Family Help and Early Intervention
Lumen Christi recognises that safeguarding is most effective when support is provided at the earliest opportunity. Where concerns do not meet the threshold for statutory intervention, the school will work collaboratively with families and partners to access appropriate support through Birmingham's Family Connect and Early Help pathways.

Where consent is obtained, an Early Help Assessment and Our Family Plan may be undertaken to coordinate support and improve outcomes for children and families.

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What children and young People need to know and do to report safeguarding concerns (abuse neglect and exploitation)

At Lumen Christi we cultivate a culture of openness and transparency and want to make it clear to all our pupils/students that we are available at any time to listen to you and will always take your concerns seriously, however small you may consider them to be.

Our pledge is:

- we will ensure we provide you with the space away from public areas for you to talk
- we will listen without judgement and endeavour to respect your wishes and feelings
- we want you to feel safe and we will be honest about our duty to prioritise your wellbeing and longer-term safety, this means, depending on the circumstances, we cannot offer you total confidentiality. We understand that this may create uncertainty, but we are confident that often when matters are dealt with as they emerge the longer-term prospects can be much improved for you and your family
- we will respect your place but if we consider that you have suffered significant harm or are at risk of harm, we will need to share this information so that you and your family can be offered the right support. We will be clear on what information needs to be shared, with whom and how it might be used
- when the concerns suggest you may benefit from early help support this may include considering support to your parents and carers with matters that will improve your situation
- we will provide a named mentor for you so that you can have the confidence and trust to know that you have someone to go to at school if you are feeling vulnerable and experiencing difficulties
- your education and welfare are important to us and we want to reassure you that your experience at school remains positive and you feel safe.

What you can do to report concerns:

- you can speak to any member of staff of your choice. Those staff will listen and support you, but we have a team of DSLs in our school who have a specific role to support children and therefore it is likely that the staff members will talk to them or arrange for you to.

If you are being abused, neglected or exploited you can call Children's Services (the details are on page 4).

If you are in immediate danger and/or think a crime has/is being committed, you can call the Police on **999.**

You can contact the NSPCC Helpline by calling 0808 800 5000 or email: help@nspcc.org.uk

How Children Can Report Concerns and How We Promote a Safe Culture

At St Peter's Catholic Primary School, we ensure that all children know how to report a worry or concern and feel confident that they will be listened to, taken seriously and supported.

We achieve this through:

- Regular safeguarding messages delivered through our **'Safeguarding Five' Friday assemblies**, where children are reminded about staying safe, recognising worries and knowing who they can talk to.
- Explicit teaching within our **Relationships, Health and Education (RHE)** and PSHE curriculum, including lessons on personal safety, trusted adults, healthy relationships, bullying, online safety and what to do if they are worried about themselves or someone else.

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- Clear guidance for pupils about the different ways they can seek help, including speaking to a trusted adult, class teacher, support staff or a member of the Designated Safeguarding Team.
- Displays, posters and safeguarding information around school that identify key safeguarding staff and remind children how to access support.
- Regular assemblies that reinforce messages about wellbeing, respect, safety and seeking help when something does not feel right.
- A positive and inclusive school culture where children are encouraged to speak openly and understand that no concern is too small to share.
- Strong relationships between staff and pupils, enabling children to feel safe, valued and confident to seek support when needed.
- Opportunities for pupils to share their views and experiences through pupil voice activities and discussions, helping leaders understand how safe children feel in school.

Children are regularly reminded that if they have a worry, concern or safeguarding issue, they should tell a trusted adult as soon as possible. They are taught that they can speak to any member of staff and that staff will listen carefully and ensure that appropriate support is provided.

Through our curriculum, assemblies and daily interactions, we promote an environment where children know they will be heard, respected and supported, helping them to feel safe and confident both in school and beyond.

Risk management and safety planning
The DSL, with support from deputy DSL, will take the lead role in managing any proposed risk by the alleged perpetrator(s) and will provide support at the same time, it is not our intention to villainise children, but it is everyone's responsibility to uphold the Behaviour Policy and standards within the school to maintain a safe environment. Such assessments or plans will be robust but sensitive to the individual needs of the children to ensure any identified risk is managed as effectively as possible whilst also supporting them to continue accessing a satisfactory level of education.

Risk management strategies can be put in place while other investigations are going on, e.g. by the Police. Although another agency such as the Police or Children's Services is or has investigated an incident, it is our duty here at Lumen Christi to ensure we identify and implement our own assessment and management of the concerns, informed by the needs of our school and the children we care for and the advice and outcomes of those agency's actions. This is to ensure that all children and staff are supported and always protected. We will consider these matters on a case-by-case basis, considering whether:

- taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the Police and/or Children's Services to determine this
- There are circumstances that make it unreasonable or inappropriate for us to reach our own view about what happened while an independent investigation is ongoing.

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10. Online Safety and Filtering

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

In line with Birmingham Right Help, Right Time, all safeguarding assessments should consider whether a child is vulnerable to, or experiencing, harm online. This includes social media, messaging platforms, online gaming, image sharing, grooming, exploitation, bullying, radicalisation and other forms of online abuse. Consideration of online activity forms part of the school's safeguarding response at all levels of need.

To address this, our school aims to:

- have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and school standard committee members
- protect and educate the whole school community to be safe and responsibly use technology, including mobile and smart technology
- set clear guidelines for the use of mobile phones for the whole school community
- establish clear mechanisms to identify, intervene in, and escalate any incidents or concerns, where appropriate.

Our approach to online safety is based on addressing the following 4 categories of risk as identified in Keeping Children Safe in Education 2026:

- **Content** – exposure to illegal, inappropriate or harmful material including pornography, racism, misogyny, self-harm, suicide, antisemitism, extremism, misinformation, disinformation and conspiracy theories.
- **Contact** – being subjected to harmful online interaction with other users, for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes. Interaction with generative AI applications which may simulate harmful online contact.
- **Conduct** – online behaviour that increases the likelihood of, or causes harm, for example: making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying and the creation, possession or sharing of AI-generated sexual images and deepfake content.
- **Commerce** – risks such as online gambling, inappropriate advertising, online fraud, phishing and/or financial scams.

To meet our aims and address the risks above, we will educate pupils about online safety as part of our curriculum. For example:

- the safe use of social media, the internet and technology
- keeping personal information private
- How to recognise unacceptable behaviour online
- ensuring children know not to meet up with a person they have met online without a safe adult
- how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- We will also:
- train staff, as part of their induction, on how to keep themselves safe online as well as children, in line with the school's online safety policy This needs to include issues for example: cyber-bullying,

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the risks of online radicalisation, and the roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required at least once each academic year

- educate parents/carers about online safety through letters and emails sent directly to them. We will also share clear procedures with them, so they know how to raise concerns about online safety
- make sure staff are aware of any restrictions placed on them with regard to the use of their personal mobile phone and cameras, *for example that:*
  - staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - e.g. Restrict mobile use to office areas and include any special provisions for school mobile phones used in the corridor.
  - staff will not take pictures or recordings of pupils on their personal phones or cameras.

- make all pupils, parents/carers, staff, volunteers and school standard committee members aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- explain to pupils, parents/carers and staff that the DfE expects schools to operate as mobile phone-free environments by default, therefore pupils should not have access to mobile phones during the school day, including lessons, movement around the site, break and lunchtime, unless a specific exemption has been authorised by the Prinicipal.
- explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- make sure all staff, pupils and parents/carers are aware that appropriate staff designated by the Principal, have the power to search pupil's phones, as set out in the DfE's guidance on searching, screening and confiscation if there is a concern regarding a child's safety or a crime in which case the Police will be contacted
- put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

Filtering and monitoring systems will be reviewed at least once every academic year by the designated senior leader responsible for filtering and monitoring, the DSL and appropriate IT support staff. Reviews will include testing filtering arrangements across all internet-enabled devices and locations. Records of checks, findings and actions taken will be retained.

AI, Deepfakes, Nudification and Image-Based Abuse
Staff will remain alert to safeguarding risks associated with artificial intelligence technologies including deepfakes, nudification applications, manipulated images, synthetic content and image-based abuse. Any creation, possession, sharing or use of such material involving children will be treated as a safeguarding concern and managed in accordance with child protection procedures.

Mobile Phones, Multiple Devices and Emerging Technologies
Lumen Christi will have clear arrangements governing the use of mobile devices by staff, volunteers, visitors and pupils. Safeguarding risk assessments will take account of the use of personal devices, multiple devices and emerging technologies.

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This section summarises our approach to online safety and mobile phone use. For full details about each school's local policies in these areas, please refer to the online safety policy and mobile phone policies which can be found on the school's website (schools to insert own hyperlink)

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11. Managing Safeguarding Concerns or Allegations made about staff, including supply teachers, volunteers and contractors

Section 11 of the 2004 Children's Act places an expectation on our school to have a clear policy in line with the BSCP Child Protection & Safeguarding procedures for dealing with allegations against staff who work with children. All staff based within our school will be considered to be in either a position of trust or working with children.

A 'position of trust' is one in which a teacher or other member of staff/volunteer is in a position of power or influence over a child, by virtue of the work or nature of activity being undertaken. The Sexual Offences Act 2003 (ss.16-24) and/or Crown Prosecution Service Website sets out detailed definitions and a range of criminal offences associated with abuse of such a position.

A person aged 18 or over is said to be in a position of trust in relation to students at the school/college if they:

- look after children at the school. "Looking after" is defined as regularly involved in caring for, training, supervising or being in sole charge of such persons
- a professional who has power and authority in a child's life and may have a key influence on their future is regarded as being in a 'position of trust'
- such a person will have regular contact with the child and may be acting in loco parentis.

The Police, Crime, Sentences and Court Act (August 2022) extended the roles which fall into the definition of 'Position of Trust' within the Sexual Offences Act (2003). The new legislation makes it an offence for anyone who coaches, teaches, trains, supervises or instructs a child under 18, on a regular basis, in a sport or a religion to engage in inappropriate relationships with those children/young people. On receipt of any information which raises a concern about any of our staff, the Chair of the Board, CEO, Principal, or School Standards Committee Chair, will consider whether the information suggests it is the following:

Allegation is a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The threshold for an allegation that is considered by the LADO is wider than those in which there is reasonable cause to suspect a child is suffering, or likely to suffer, harm. The LADO threshold is, in respect of all people working or volunteering with children in a position of trust, where they 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 towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Any information or concern which meets the above threshold should be referred to the LADO service prior to the school taking any action.

Concern about the Quality of Care/Practice is an accusation, not of a child protection nature, that the care/practice provided to a child does not meet the standards expected and is about the level of value provided by any care/practice resource, as determined by some measurement. As with quality in other

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fields, it is an assessment of whether something is good enough and whether it is suitable for its purpose.
These types of concerns should be addressed internally using performance management processes.

Complaint is a statement that something is unsatisfactory or unacceptable. A concern may be defined as 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought.' A complaint therefore can be defined as 'an expression of dissatisfaction however made, about actions taken or a lack of action.'

These issues must be addressed through internal complaints policy and procedures.

When concerns/allegations meet the harm threshold Lumen Christi schools are required to comply with both Part Four of KCSiE and also Birmingham Safeguarding Children Partnership procedures manual section Allegations Against Staff or Volunteers

All staff and volunteers at Lumen Christi are required to immediately report any level of concerns about behaviour and/or conduct of adult working/volunteering with children towards a child to leadership and management. This includes reporting adults who are providing out of school activities/leasing Lumen Christi facilities.

What happens next
Chair of the Board/CEO/Principal/Chair of School Standard Committee members may undertake initial inquiries to gather key information. They will assess whether the allegation meets the LADO threshold, if it does, they will make a referral to LADO giving consideration to our staff code of conduct, managing allegations policy and BSCP Allegations Against Staff or Volunteers procedures. If necessary, they will compete a LADO referral within one working day.

If the allegation does not meet the harm threshold for LADO, our Chair of the Board/CEO/Principal/Chair of School Standard Committee members will follow the school's Low Level Concerns policy.

Role of LADO
- **Case management** - oversee the process and ensure it is working, not to investigate.
- **Consultation** - provide advice and guidance to employers and voluntary organisations.
- **Monitoring** - the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.
- **Liaison** -with the Police, Children's Services and other partner agencies (managers of the subject of allegation).

Role of school's Case Manager, includes:
- clarify facts of the concerns/allegation (not investigate) before contacting the LADO
- take part in Strategy Meetings to liaise with other partner agencies
- undertake internal planned inquiries/fact finding
- take part to review the progress of the case in which there is a Police officer investigation
- operate a thorough disciplinary process when appropriate
- ensure a properly managed conclusion and outcome to process.

LADO Principles and Response
Timeliness - any allegation of abuse must be dealt with fairly, quickly and consistently in accordance with the safeguarding and child protection procedures, this is best practice to provide immediate safety

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for child/ren and make safe arrangements for the person who is the subject of the allegation. It is crucial that employers **make a referral to LADO within one working day**.

Objectivity - it is not permissible for a member of staff to conduct (though their involvement may still be required) an enquiry about suspicion or allegation of abuse with respect to a:

- relative
- friend
- colleague, supervisor/supervisee or someone who has worked with her/him previously in any of these capacities.

If, following the conclusion of child protection processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses.

Confidentiality - information about an allegation must be restricted to those who have a need to know in order to:

- protect children
- facilitate enquiries
- avoid victimisation
- safeguard the rights of the person about whom the allegation has been made and others who might be affected
- manage disciplinary/complaints aspects.
- A media strategy should be developed with no improper or inadvertent releases of information to the media, in accordance with the Association of Chief Police Officers (ACPO) guidance (now known as The National Police Chiefs' Council (NPCC)

Concerns that DO NOT meet the harm threshold - Low-Level Concerns (LLC)

Schools must have a policy in place which outlines the relevant processes and procedures for dealing with concerns raised to them that do not meet the LADO threshold, these concerns are referred to as low-level concerns. A low-level concern is any concern, however small, including a sense of unease or a nagging doubt 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.

The term low-level does not seek to minimise the seriousness of any concerns, the term low-level indicates that it a concern that is lower than the LADO threshold, but they are still practice concerns that need to be considered with a safeguarding lens and require suitable action through internal procedures of the school. It is important these are managed robustly as a repeated low-level concern or a pattern of concerns which may not meet the LADO threshold individually may together indicate a concern about the person's suitability and potential risk to children in the capacity of their role.

At Lumen Christi, leadership manage LLC using our school's internal due process, if we consider a member of staff has breached our school's code of conduct, depending on the seriousness and impact on a child, we will also liaise with our human resource service:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- helping identify any weakness in the school's or college's safeguarding system.

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Our low-level concerns policy/clarification is a reflection and extension of Lumen Christi's wider relevant staff behaviour guidance and code of conduct.

Concerns may arise from a range of scenarios, e.g. suspicion; complaint or disclosure made by a child, parent or other adult within or outside of the organisation or as a result of vetting checks undertaken. All staff should know that in line with our school's culture we encourage staff to have the confidence and trust to confine in leadership if they have concerns about adults working or volunteering with children.

We share information responsibly and understand this is on a need-to-know basis.

We apply our protocols for recording and storing information confidentially.

We encourage an open and transparent culture, to identify concerning, problematic or inappropriate behaviour early so that we are able to minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and in accordance with the ethos and values of the institution.

The role of our school's case manager and the principles for manging LLC is the same as set out above reporting process parallel to what is set out within the section where concerns meet harm threshold, for example the principles and practice.

If we are uncertain of threshold criteria for either LADO referral or LLC we consult with school's HR and the LADO. At Lumen Christi *we* have clear codes of conduct and processes in place to deal with any concerns or allegations which do not meet the LADO threshold. Such concerns may arise from suspicion, complaint, safeguarding concerns, or allegation from another member of staff, disclosure made by a child, parent or another outside of the school or pre-employment vetting checks.

After-school clubs, community activities and tuition: safeguarding guidance for providers
Lumen Christi has a legal duty of care to ensure we maintain a safe environment for children. If we receive an allegation or concern relating to an incident that has happened when an outside individual or organisation is using our school premises, we will ensure that we follow our school's safeguarding and child protection procedures, which includes reporting allegations to the LADO, Children's Social Care and Police if a crime has been committed.

It is the role of the School Standards Committee to ensure any organisation that hires the school premises is compliant with the guidance set out in Out-of-school settings: safeguarding guidance for providers - GOV.UK In particular we have embedded within our lease agreement with external organisations the standards and expectations for them to provide evidence and assurance of their safeguarding and child protection procedures.

Other complaints
If any of our stakeholders are not satisfied with any aspects of how we implement and comply with safeguarding policies and procedures, our school Complaints Procedures can be found on our school website at: https://www.lumenchristi.org.uk/docs/0025_Polices/Complaints_Policy.pdf

Whistleblowing
At Lumen Christi we strive to create a culture of openness, trust and transparency to encourage all staff to confidentially share any concerns they have about poor or unsafe practice, concerns or allegations

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against staff or the school's safeguarding practice and arrangements so they can be addressed appropriately.
All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding procedures and arrangements.

Examples where Whistleblowing may apply**:**

- pupil's or staff member's health and safety are being put in danger
- failure to comply with a legal obligation or statutory requirement
- attempts to cover up the above, or any other wrongdoing that is in the public/school interest
- do not delay! Your concerns should be taken seriously and investigated, and your confidentiality respected
- you should report your concern to the Principal/other member of staff on the SLT, and if concerns are about the Principal, report to the Chair of the School Standards Committee. Concerns about any members of the Shared Services team should be reported to the CEO and concerns regarding the CEO should be reported to the Chair of the Board.

If, for any reason, there are difficulties with following the above procedure, you can whistle blow directly to Children's Services and/or the Police on 999, or to the NSPCC Whistleblowing Helpline 0800 028 0285 help@nspcc.org.uk

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12. Record Keeping

Lumen Christi will hold records confidentially, safely, securely and in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child (either paper recorded or electronically).

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to know/access them.

Safeguarding records relating to an individual child will be retained for the student until they reach their 25th birthday or 31st birthday if there is an EHCP in place (Information Records Management Society 2022).

Safeguarding records which contain information about allegations of sexual abuse were being retained for the Independent Inquiry into Child Sexual Abuse (IICSA). This has now concluded, and the Home Office sent a letter to schools advising that files no longer needed to be kept indefinitely. However, the recommendations from the inquiry have stated:

Recommendation 17: Access to records The UK government should direct the Information Commissioner's Office to introduce a code of practice on keeping and accessing records which relate to child sexual abuse. The code should require records about child sexual abuse and allegations of child sexual abuse to be kept for 75 years, with appropriate review periods.
Each Lumen Christi school will follow the Recommendation 17.

Receiving in and transferring pupil records to other education provision
If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding information file is forwarded as soon as possible, securely, and separately from the main pupil file.
To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or
- **the first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the wellbeing and safety of the child. Where safeguarding information indicates a risk to others, including previous carrying, threatening with or use of a knife or weapon, the receiving school should consider whether a risk assessment and safety plan are required on admission.

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Retention, archiving and destruction of records

For records that are not transferred to another school, for example the child leaves the country or is going to be home educated, we have:

- we follow the IRMS retention schedule.
- secure and appropriate system to archive with restricted access
- we have a written assurance from our providers of our electronic recording systems that all records are maintained securely, which includes any archived records.
- Storage, retention, and destruction of our child protection files are also made clear in our data management policy.

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13. Appendix: Links to useful information

Local:
Birmingham Safeguarding Children Partnership
Birmingham Children's Trust
Birmingham City Council - Children, Young People & Families
BCC Corporate Safeguarding Policy
BCC No Platform Policy | Birmingham City Council
BCC School Safety Plan re children who pose a risk to others

CPR2C Form v2.docx

Birmingham Safeguarding Tools
The following local safeguarding tools should be used where appropriate:

- Birmingham Neglect Screening Tool
- Birmingham Combined Exploitation Screening Tool
- Right Help, Right Time (Version 7)
- Early Help Assessment and Our Family Plan
- Family Connect Referral Pathway
- Resolution and Escalation Protocol for Professional Disagreements.

Use of Artificial Intelligence in education
Generative artificial intelligence (AI) in education (DfE)
Using AI in education: support for school and college leaders (DfE)

Online safety:
NSPCC online-safety-for-schools
National Child Exploitation & Online Safety Centre
Bristol online-safety-and-cyber-crime resources
Hampshire online safety resources

Safer Recruitment:
Staffing and employment: advice for schools (DfE)
Safer Recruitment Consortium guidance

To be added when published:

- Guidance document for educational establishments in Birmingham in the event of a suspected suicide in a school community

- Critical Incident Guidance for Schools

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