Witness Name: Margaret Mulholland (ASCL)
Exhibits: MM/01 – MM/19
Dated: 30 July 2026

THE SOUTHPORT INQUIRY

WITNESS STATEMENT OF MARGARET MULHOLLAND
ON BEHALF OF THE ASSOCIATION OF SCHOOL AND COLLEGE LEADERS

I, Margaret Mulholland, will say as follows:

INTRODUCTION

1. I am the Special Educational Needs and Disabilities (SEND) & Inclusion Policy Specialist for the Association of School and College Leaders (ASCL).

2. This witness statement is made to assist the Southport Inquiry ("the Inquiry") with the matters set out in the Rule 9 Request dated 26 June 2026.

BACKGROUND

3. ASCL Policy specialists serve a dual role as a national education experts and union representatives. Specialists influence government education policy on behalf of school leaders while providing direct advisory support and guidance to ASCL members. Policy specialists are generally national experts in their field and are almost exclusively former school, college, or trust leaders.

4. I am the SEND & Inclusion Policy lead at the ASCL, working with schools, trusts and government as an advocate for inclusive practice. I am a SEND board advisor to Challenge Partners, Whole Education, Liberty Academy Trust, the University College London Centre for Teaching & Teaching Research and an Honorary Norham Fellow at University of Oxford Department of Education. I sit on several advisory groups for the Department of Education.

5. Previously, I held teacher, leader and trustee roles in secondary, special settings and teacher education at UCL Institute of Education. I was a director at Camden Learning, a non-exec director at think tank CfEY, joint Project Director for Nasen Whole School SEND leading an Education Endowment Foundation trial of the SEND Review Framework and earlier this year appointed to the Institute of Public Policy Research Inclusion Task Force.

6. I am a contributing author to several educational texts including Reflective teaching in secondary schools (Bloomsbury), Practical Theorising in Teacher Education (Routledge), writes regularly for TES Magazine and is a national and broadcast media commentator on education matters.

7. ASCL is a trade union and professional association representing over 25,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business leaders and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million children and young people across primary, secondary, post-16 and specialist education.

8. ASCL welcomes the opportunity to contribute evidence to the Southport Public Inquiry.

9. The term "Violence Fixated Individual" is rarely used in schools. Designated Safeguarding Leads (DSLs) are generally familiar with terms such as serious violence, child-on-child abuse, radicalisation, harmful sexual behaviour, contextual safeguarding and mental health concerns. Pupils presenting fixation on violence are generally managed through these existing frameworks rather than a distinct VFI approach.

10. This use of inconsistent language can risk miscommunication and misunderstanding across the sector. ASCL recommends developing and publishing a nationally agreed education definition of a Violence Fixated Individual (VFI), supported by clear descriptors, indicators and examples to ensure consistent understanding across education and partner agencies.

11. Policies that come closest to determining VFI are Keeping Children Safe in Education (KCSIE) 2026 (Part One – safeguarding responsibilities; serious violence; online safety) **(MM/01 – DFE000262** Working Together to Safeguard Children **(MM/02 – DFE000263**; Counter-Terrorism and Security Act 2015 & Prevent Duty Guidance; Behaviour in Schools **(MM/04 – ASCL000001**

12. In not one of these government policy documents is the term 'VFI' used therefore no statutory definition exists in education to support its use by schools.

13. The approach to identifying and managing behaviours associated with violence fixation is likely to vary across different education settings. Mainstream schools, special schools, further education providers and Pupil Referral Units (PRUs) all operate within the same overarching statutory safeguarding framework, but the nature, prevalence and complexity of presenting behaviours differ.

14. PRUs and specialist settings are more likely to encounter pupils with multiple vulnerabilities, including trauma, behavioural needs, neurodevelopmental conditions and involvement in serious violence, requiring more intensive risk assessment and multi-agency working. Across all settings, however, there is currently no nationally recognised education-specific definition of a Violence Fixated Individual (VFI).

15. Although the term VFI is not used within education legislation or statutory guidance, aspects of the concept are reflected in safeguarding practice through the Prevent Duty. Ofsted evaluates how effectively schools, colleges and further education providers discharge their statutory Prevent responsibilities as part of its inspection of safeguarding and behaviour. Updated Prevent guidance recognises that vulnerability to radicalisation may include individuals who have no fixed political or religious ideology but who demonstrate an obsessive interest in mass casualty attacks, extreme violence or related harmful content. Consequently, education providers are expected to recognise, record and respond to behaviours that may indicate an escalating fascination with violence, even where these do not fit traditional ideological models of extremism.

16. It is important to note that this does not amount to a statutory education definition of a VFI, nor does Ofsted assess schools against a specific VFI framework. Rather, inspectors consider whether schools have effective safeguarding systems in place to identify, assess and respond to concerning behaviours, including those associated with serious violence, online harms and radicalisation.

17. There has been significant public scrutiny of Prevent-related training materials. In 2025, Ofsted faced criticism regarding internal Prevent training resources that were perceived as associating certain neurodivergent characteristics with increased vulnerability to extremism. Following concerns raised by parents, campaign groups and neurodiversity advocates, Ofsted withdrew these materials and revised its guidance in 2026. This structural challenge to the accountability system highlights the importance of ensuring that professionals distinguish carefully between neurodevelopmental conditions and behaviours that genuinely indicate an increased risk of

targeted violence, with assessments remaining evidence-based, proportionate and free from stereotyping.

18. ASCL consults regularly with its membership on safeguarding issues faced by educational settings. Most recently we have provided consultation feedback on statutory guidance for the information sharing duty **(MM/05 – ASCL000002** and on changes to the draft KCSIE 2026; Keeping Children Safe in Education **(MM/06 – ASCL000003)**.

19. Our consultation responses request better training but most importantly ASCL requests refer to the additional time to enable training to be of appropriate quality. Statutory safeguarding expectations outlined in KCSIE 2026 **(MM/01 – DFE000262** and Working Together to Safeguard Children 2026 **(MM/02 – DFE000263)** place significant safeguarding expectations on the whole school workforce. Part one of the statutory guidance must be understood by all staff. The statutory expectation means school leaders must develop the knowledge, understanding and active awareness of all staff on sexual abuse, online harm, violence, allergies, child protection etc. The list is long and yet the time available to schools to build knowledge and understanding is severely limited.

20. School leaders can allocate up to 30 hours per year (typically structured as 6 hours per day across the 5 days) for whole-school training, safeguarding updates, and curriculum planning. The 5 INSET days themselves are not tied to a prescribed menu of training topics in law; what is statutory is the allocation of 5 days' directed time for non-teaching work and the large set of duties and guidance that schools are then expected to train staff on and implement. There is for schools a long, policy-oriented list of statutory and non-statutory expectations that typically "compete" for INSET time. ASCL's *Blueprint for a Fairer Education System 2021* **(MM/07 – ASCL000004)** called for an increased commitment from government to ensuring all teachers and leaders have access to, and time to engage in, high quality professional development. Currently the training time available to schools that allows them to work with their whole workforce is insufficient and this in itself poses a safeguarding risk.

21. ASCL works collaboratively with a wide range of national, regional and local organisations to support schools and colleges in fulfilling their safeguarding responsibilities. This includes engagement with government departments, inspectorates, safeguarding partners, academics, charities and professional bodies to influence policy, develop guidance and support educational leaders in responding to emerging safeguarding risks.

22. The statutory framework for this work is principally provided by the Children Act 2004, the Education Act 2002, Working Together to Safeguard Children **(MM/02 – DFE000263)**,

Keeping Children Safe in Education (KCSIE) **(MM/01 – DFE000262)**, and the inspection frameworks operated by **Ofsted (MM/10 – ASCL000005)** and the Independent Schools Inspectorate (ISI) **(MM/11 – ASCL000006)**.

a) Sections 10 and 11 of the Children Act 2004 establish the expectation that organisations working with children cooperate to improve children's wellbeing and make arrangements to safeguard and promote their welfare. Schools are recognised as key safeguarding partners within local multi-agency arrangements, requiring effective collaboration with children's social care, health services, police and other relevant agencies.

b) Sections 175 and 157 of the Education Act 2002 place statutory duties on maintained schools, academies, independent schools and colleges to make arrangements to safeguard and promote the welfare of children. These duties underpin the expectations placed upon school leaders and governing bodies and form the basis of much of ASCL's advice and professional support to members.

c) Working Together to Safeguard Children **(MM/02 – DFE000263)** provides the overarching statutory framework for multi-agency safeguarding arrangements in England. It establishes the responsibilities of safeguarding partners, emphasises early help, information sharing, coordinated assessment and shared ownership of safeguarding risk. ASCL regularly supports members in understanding and implementing these expectations, particularly where effective collaboration between education and other agencies is essential.

d) Keeping Children Safe in Education (KCSIE) **(MM/01 – DFE000262)** translates these wider safeguarding duties into operational expectations for schools and colleges. It provides statutory guidance on safeguarding leadership, safer recruitment, child protection, online safety, information sharing, serious violence, contextual safeguarding and multi-agency working. ASCL routinely contributes to Department for Education consultations on revisions to KCSIE and provides advice, briefings and professional development to support implementation across the sector.

e) The Ofsted Education Inspection Framework **(MM/10 – ASCL000005)** and the Independent Schools Inspectorate (ISI) Standards **(MM/11 – ASCL000006)** reinforce these statutory responsibilities through inspection. Both inspectorates evaluate how effectively leaders create a safeguarding culture, identify and manage risk, work with safeguarding partners and fulfil their statutory duties. While inspection frameworks do

not prescribe operational safeguarding practice, they do provide an important mechanism for evaluating whether statutory expectations are being met in practice.

23. ASCL also works closely with the Department for Education, contributing to consultations on safeguarding legislation, statutory guidance and emerging policy developments. It maintains constructive relationships with Local Authorities, safeguarding partnerships, police and other public bodies through consultation and policy engagement, recognising that effective safeguarding depends upon coordinated multi-agency working.

24. Alongside statutory partners, ASCL works with leading academic institutions to ensure members benefit from the latest research and evidence-informed practice. This includes a close working relationship with the Durham University Global Centre of Contextual Safeguarding, supporting the development of contextual safeguarding approaches, and collaboration with University College London (UCL) on research relating to online harms, digital risk and safeguarding in education.

25. Schools consistently report that effective safeguarding depends upon strong multi-agency collaboration. However, members also describe significant variation between local areas, particularly in referral thresholds, availability of specialist services, communication with partner agencies and access to timely advice. These inconsistencies can result in schools managing increasingly complex safeguarding concerns without proportionate support from statutory partners.

26. ASCL considers that there is scope to strengthen the national framework by promoting greater consistency in multi-agency working, including clearer referral pathways, improved information sharing, timely access to specialist expertise and stronger shared accountability between education, children's social care, health and policing, regardless of geographical location.

IDENTIFIYING AND MANAGING RISK

27. ASCL has not consulted members specifically on VFI for the reasons set out earlier. ASCL has however sought members' views on the identification and management of violence-fixated individuals indirectly, through its response to the DfE consultation on Keeping Children Safe in Education 2026 **(MM/06 – ASCL000003)** rather than through a separate published member survey on that specific topic. ASCL has a well-established pattern of asking members for views on safeguarding-related issues, and calls for evidence on safeguarding, behaviour, restrictive practices, and school safety. ASCL also consults regularly with elected council committees on

the issue of online harms, behaviour and safeguarding as evidenced through ASCL Council committee minutes.

28. Our members tell us they have ongoing concerns about the level of knife crime and the number of young people who carry weapons for protection. They also have growing concerns about the influence of digital harm and toxic social media in shaping the behaviours of young people. In particular the online grooming that is encouraging the misogynistic language and attitudes of young men. ASCL members also tell us these toxic cultures are affecting the views of young women too.

29. In response to the concerns of our members ASCL have worked with UCL academics to better understand the impact of online scrolling. The Safer Scrolling report **(MM/12 – ASCL000007)** highlights the impact of the 'manosphere' and the toxic online environments that young people are being drawn into. We were particularly concerned by the rapidly changing nature of the harm that young people are experiencing and the difficulties this poses for schools in literally holding relevant knowledge of for example, sextortion or deep fakes and synthetic media. This is where the opportunity for the school workforce to access up to date, relevant training is so important.

30. To support school training ASCL has again worked with UCL to produce a suite of resources that focus on the quality of online engagement rather than simply suggesting it is the time spent online that is problematic to young people. The resources promote Digital Nutrition and support the agency of young people to make better decisions about how they engage safely and healthily in the online world.

31. In response it would be reasonable to conclude that currently ASCL treats VFI as a safeguarding and risk-assessment issue, not just a security issue.

32. Although the term VFI is rarely used within education, ASCL is increasingly asked to provide advice on safeguarding concerns involving behaviours that may be associated with violence fixation. These include violent ideation, fascination with previous mass casualty attacks, weapon-related behaviours, concerning online activity, misogynistic or grievance-based content, and escalating patterns of behaviour that cause concern but do not necessarily meet the threshold for criminal investigation or statutory safeguarding intervention.

33. The publication of Keeping Children Safe in Education (KCSIE) 2026 **(MM/01 – DFE000262)** has further strengthened schools' focus on serious violence, online safety, information sharing and early identification of safeguarding concerns. Likewise, the Prevent Duty Guidance **(MM/04 – ASCL000001** requires schools and colleges to identify and respond to individuals who may be vulnerable to radicalisation, including those whose vulnerability is linked to a

fascination with extreme violence rather than a fixed ideological motivation. Together, these frameworks have increased professional awareness of behaviours that may indicate escalating risk, resulting in more schools seeking advice at an earlier stage.

34. A recurring theme from members is uncertainty about managing concerns that fall below the intervention thresholds of children's social care, mental health services or policing but nevertheless indicate a potential risk of escalation. In these cases, schools frequently seek advice on proportional risk assessment, information sharing, multi-agency working and the appropriate use of professional curiosity while continuing to support the child.

35. ASCL is not aware of any national dataset that captures the frequency or prevalence of education concerns relating specifically to violence fixation or comparable behaviours. As a result, it is difficult to quantify the scale of the issue or identify emerging trends. ASCL would support the development of a national mechanism for collecting anonymised data relating to violence fixation concerns within education to inform future policy, training, resource allocation and early intervention strategies.

36. ASCL does not currently produce guidance that specifically addresses Violence Fixated Individuals (VFIs), reflecting the fact that there is no statutory education definition or framework relating to VFIs. Instead, ASCL supports members through advice and guidance based on the existing statutory safeguarding framework.

37. The principal guidance utilised by ASCL includes:

- Keeping Children Safe in Education (2026) **(MM/01 – DFE000262)** – particularly Part One (safeguarding responsibilities of all staff), the sections on early help, serious violence, online safety, information sharing, child-on-child abuse, and the responsibilities of designated safeguarding leads. These provide the primary framework for identifying, assessing and managing behaviours that may indicate an escalating risk of harm.
- Prevent Duty Guidance **(MM/04 – ASCL000001)** – particularly the sections relating to identifying individuals vulnerable to radicalisation, including those who may be drawn towards violence without a fixed ideological motivation, and the expectations for risk assessment, referral and multi-agency working.
- DfE Filtering and Monitoring Standards and the Online Safety Act 2023 – which support schools in reducing children's exposure to harmful online content, strengthening filtering and monitoring arrangements, and responding to online behaviours that may contribute to the development or reinforcement of violent ideation.
- Searching, Screening and Confiscation and Behaviour in Schools **(MM/15 – ASCL000009)** – which provide the statutory and non-statutory framework for

responding to incidents involving knives, bladed articles and other prohibited items, including the use of search powers, safeguarding responses and information sharing with relevant agencies.

38. In practice, schools rely on these established safeguarding, behaviour, online safety and Prevent frameworks when responding to behaviours that may be associated with violence fixation. Very few schools have specific policies or procedures addressing violence fixation as a distinct safeguarding issue, meaning that responses are often developed through existing safeguarding processes and the professional judgement of safeguarding leaders.

39. ASCL considers there is a clear opportunity to develop dedicated national guidance for education that brings together violence fixation, targeted violence, online harms, weapon fascination and multi-agency safeguarding into a single coherent framework, complementing rather than replacing existing statutory guidance.

40. ASCL considers there to be significant gaps in the current national strategy, guidance, governance and accountability arrangements relating to behaviours associated with violence fixation. This is primarily because there is no dedicated statutory framework for education addressing Violence Fixated Individuals (VFIs). Instead, schools are expected to apply existing safeguarding frameworks, including Working Together to Safeguard Children **(MM/02 – DFE000263)**, Keeping Children Safe in Education (2026) **(MM/01 – DFE000262)** and, where appropriate, the Prevent Duty Guidance **(MM/04 – ASCL000001)**.

41. These frameworks provide clear expectations around safeguarding, information sharing and multi-agency working but do not establish a specific approach to identifying, assessing or managing young people who present an escalating fascination with violence but do not meet the threshold for intervention by children's social care, mental health services or the criminal justice system.

42. Members frequently report uncertainty regarding case ownership where concerns are significant but fall below statutory intervention thresholds. In these circumstances, schools can find themselves managing complex and potentially escalating risks with limited access to specialist advice, inconsistent support from partner agencies and no nationally recognised assessment framework. Variations in local thresholds and multi-agency arrangements can further contribute to inconsistent practice across England.

43. ASCL considers there is a need for a cross-government strategy that clearly defines agency responsibilities, strengthens governance and accountability, and provides a consistent framework for managing concerns relating to violence fixation. This should include clearer referral pathways, nationally recognised assessment processes and shared responsibility

between education, children's social care, health and policing for young people presenting concerning behaviours below existing statutory intervention thresholds.

44. ASCL does not facilitate or recommend training specifically labelled as Violence Fixated Individual (VFI) training, reflecting the absence of a statutory education framework or recognised professional standard in this area. Instead, members are supported through safeguarding training and professional development based on the existing statutory framework.

45. Keeping Children Safe in Education (2026) **(MM/01 – DFE000262)** requires all staff to receive safeguarding and child protection training at induction, regular safeguarding updates and training that equips them to recognise indicators of abuse, neglect, exploitation, serious violence, online harms and mental health concerns. Designated Safeguarding Leads are expected to undertake more advanced training that enables them to understand local safeguarding arrangements, work effectively with partner agencies and support staff in responding to emerging safeguarding risks.

46. Most schools and colleges also ensure that staff complete Prevent Duty awareness training. This supports practitioners to recognise vulnerability to radicalisation, understand referral processes and contribute to multi-agency safeguarding arrangements. Working Together to Safeguard Children **(MM/02 - DFE000263)** further reinforces the importance of multi-agency learning and continuous professional development to improve safeguarding practice across partner organisations.

47. Whilst these frameworks provide a strong foundation for safeguarding practice, feedback from ASCL members suggests there is limited training specifically addressing behaviours associated with violence fixation. Professionals report variable confidence in recognising pre-attack behaviours, grievance-fuelled violence, leakage behaviours, fascination with previous attacks, weapon fixation and online pathways towards targeted violence. Confidence also varies in responding to emerging online harms, including the influence of algorithm-driven content, misogynistic communities and AI-generated material.

48. Members have also highlighted that behaviours associated with violence fixation are often considered through existing Prevent training. Practitioners are concerned that behaviours linked to targeted violence without a clear ideological motivation may not always be recognised or managed consistently. As a result, confidence varies considerably between settings and often depends on local expertise and access to specialist advice.

49. ASCL considers there is a need for nationally recognised professional development that complements, rather than duplicates, existing safeguarding and Prevent training. Such training

should equip education professionals to recognise violence fixation, pre-attack indicators, leakage behaviours, grievance-fuelled violence, online pathways towards targeted violence and effective multi-agency risk management, while ensuring assessments remain evidence-based, proportionate and consistent with existing statutory safeguarding responsibilities.

50. ASCL is not aware of a nationally recognised risk assessment tool designed specifically to assess behaviours associated with Violence Fixated Individuals (VFIs). Instead, schools utilise a range of existing safeguarding tools and processes to identify, assess and manage risk.

51. These commonly include safeguarding chronologies, child protection and welfare risk assessments, contextual safeguarding assessments, behaviour risk assessments, online safety risk assessments, local authority assessment templates and electronic safeguarding recording systems. The choice of tool is often determined by local safeguarding partnership arrangements, local authority guidance and the nature of the presenting concerns.

52. Keeping Children Safe in Education (2026) **(MM/01 – DFE000262)** requires schools to identify children who may benefit from early help, assess safeguarding concerns, maintain clear and accurate records and work collaboratively with other agencies where there is a risk of harm. Working Together to Safeguard Children **(MM/02 – DFE000263)** reinforces the importance of shared assessment, professional judgement, information sharing and coordinated multi-agency decision-making. Where concerns meet the threshold for statutory intervention, the assessment processes set out under Sections 17 and 47 of the Children Act 1989 provide the framework for children's social care assessments. Schools also routinely work within locally agreed safeguarding partnership threshold guidance when determining the appropriate response.

53. Feedback from ASCL members indicates that the absence of a nationally recognised framework for assessing behaviours associated with violence fixation results in variation in professional judgement, recording practices and risk management across education settings. Practitioners are frequently required to adapt existing safeguarding tools to circumstances for which they were not specifically designed.

54. Members have also identified the evolving online environment as an additional challenge. As children's digital behaviours become less visible to schools and increasingly take place on personal devices or within private online platforms, identifying escalating patterns of concern may become more difficult, placing greater emphasis on professional curiosity, effective information sharing and early multi-agency intervention.

55. ASCL considers there would be significant benefit in developing a nationally endorsed education risk assessment framework for behaviours associated with violence fixation. Such a

framework should complement existing safeguarding processes and support greater consistency in assessment, recording, information sharing and multi-agency decision-making across education, children's social care, health and policing.

56. ASCL members generally report a high level of confidence in identifying established safeguarding concerns, including abuse, neglect, exploitation, child-on-child abuse, serious violence and online harms, reflecting the expectations set out in Keeping Children Safe in Education (2026) **(MM/01 – DFE000262)**. Staff also receive safeguarding and, where appropriate, Prevent Duty training, which supports the identification of children who may be vulnerable to radicalisation or other forms of harm.

57. However, members report lower levels of confidence in recognising behaviours that may indicate an escalation towards targeted violence where there is no clear ideological motivation or statutory threshold for intervention. In particular, practitioners describe uncertainty when concerning behaviours overlap with typical adolescent development, neurodevelopmental conditions, mental health needs or other vulnerabilities. The absence of a nationally recognised education framework for identifying behaviours associated with violence fixation can lead to variation in professional judgement and confidence across settings.

58. ASCL considers that practitioners would benefit from practical national guidance, case studies and evidence-based decision-making tools to support the identification and assessment of behaviours associated with violence fixation. Such guidance should complement existing statutory safeguarding frameworks while ensuring assessments remain proportionate, evidence-based and avoid inappropriate stereotyping or assumptions about children with additional needs.

59. While DSLs are generally confident in recognising safeguarding concerns, confidence reduces significantly once a child is identified as potentially violence-fixated. Members consistently report uncertainty regarding referral pathways, thresholds for intervention, and which agency should lead the response. Information sharing is often dependent on local professional relationships rather than nationally consistent processes, resulting in variable practice across areas. Where effective multi-agency partnerships exist, risk management is strengthened; however, inconsistency in local arrangements means schools can be left managing significant concerns without clear ownership or coordinated oversight.

60. ASCL members report that parental engagement can significantly influence the management of safeguarding concerns where behaviours associated with violence fixation are identified. While most parents work constructively with schools, members describe occasions where concerns are minimised, consent for support is withheld or withdrawn, or engagement with

external agencies is limited. These situations are particularly challenging where the level of risk is concerning but does not meet the threshold for statutory intervention.

61. Working Together to Safeguard Children **(MM/02 – DFE000263)**, Keeping Children Safe in Education (2026) **(MM/01 – DFE000262)** and the Information Sharing Advice for Practitioners **(MM/18 – ASCL000011)** make clear that, where there is a safeguarding concern, the welfare of the child is paramount and information can be shared without consent where there is a lawful basis to do so. The Data Protection Act 2018 and UK GDPR support proportionate information sharing where it is necessary to safeguard children and young people.

62. Despite this, ASCL members report uncertainty when managing cases that fall below statutory safeguarding thresholds, particularly where parental consent has been withheld but concerns about escalating behaviour remain. Practitioners seek greater clarity on balancing parental engagement with safeguarding responsibilities in these circumstances.

63. ASCL considers that supplementary national guidance would assist schools by providing practical advice on parental engagement, lawful information sharing, escalation pathways and decision-making where concerns exist but statutory intervention thresholds have not yet been reached.

64. ASCL believes the most effective approach would be to strengthen existing multi-agency safeguarding arrangements rather than create a new structure specifically for Violence Fixated Individuals (VFIs). Existing statutory frameworks, including safeguarding partnerships and public protection arrangements, provide an appropriate foundation, provided there is greater national consistency and clarity regarding roles and responsibilities.

65. A key issue identified by members is the absence of a clearly designated lead agency. Once a concern has been identified, schools are often uncertain who should assume case ownership, coordinate the multi-agency response, oversee information sharing, and monitor risk over time. This can result in fragmented responses, duplication of effort, or schools retaining responsibility for managing complex risks beyond their remit.

66. On behalf of our members ASCL would therefore support:
    - A clearly identified lead agency responsible for coordinating the multi-agency response, maintaining oversight of risk, convening review meetings, and ensuring management plans remain current.
    - Nationally agreed referral pathways and thresholds, reducing reliance on local relationships and inconsistent practice.

- Timely, lawful and proportionate information sharing, enabling education settings to understand the risks relevant to their safeguarding responsibilities while respecting data protection requirements.
- A coordinated multi-agency risk management plan, with clearly defined actions, ownership, review arrangements and escalation processes.
- Consistent recording and monitoring arrangements, ensuring all agencies have a shared understanding of risk, interventions and outcomes.

67. Schools should play a central role in identifying concerns, sharing relevant safeguarding information, implementing agreed actions within the educational environment, and monitoring changes in presentation. However, members are clear that education settings should not be expected to lead or coordinate the management of complex VFI cases, which require statutory agency oversight and multi-agency expertise.

68. Overall, our members consider that strengthening existing structures through clearer national guidance, defined leadership, and consistent operational processes would provide a more effective and sustainable response than establishing a new standalone framework.

69. Our members have significant experience of coordinating safeguarding activity within schools and contributing to multi-agency planning. However, they do not have the statutory authority, specialist remit or capacity to lead the management of complex VFI cases across agencies. In practice, DSLs already coordinate complex safeguarding cases despite having no authority to direct partner agencies, making this responsibility resource-intensive and difficult to sustain. ASCL supports a clearly defined lead professional model, with responsibility allocated according to the primary nature of the risk and transferring, where appropriate, between education, children's services, health or policing. This would provide clear case ownership, improve accountability, strengthen information sharing and reduce duplication, while allowing schools to fulfil their safeguarding responsibilities without assuming responsibility for managing risks beyond their statutory role.

70. Our members strongly support the development of a shared multi-agency risk assessment framework, accompanied by national practice guidance for consistent use across education, policing, health and children's services. Practitioners frequently report adapting existing safeguarding or threat assessment tools because no framework is specifically designed for violence-fixated individuals. A common approach would improve consistency in risk identification, assessment, information sharing and decision-making, while increasing practitioner confidence and supporting more coordinated multi-agency responses. The principal challenge will be ensuring the framework is proportionate, evidence-based, supported

by training, and integrated into existing safeguarding processes without creating unnecessary duplication or administrative burden.

71. Our members consider that a culture of shared ownership must be underpinned by clear statutory expectations that violence fixation is a multi-agency safeguarding concern requiring coordinated responsibility, rather than threshold-based transfer of responsibility between agencies. While Keeping Children Safe in Education 2026 **(MM/01 – DFE000262)** reinforces that safeguarding is everyone's responsibility and Working Together to Safeguard Children **(MM/02 – DFE000263)** requires agencies to collaborate in promoting children's welfare, schools frequently report feeling isolated when referrals are declined or intervention thresholds are not met. This can lead to repeated referrals, uncertainty over case ownership and safeguarding drift despite persistent concerns. ASCL would welcome strengthened statutory guidance that reinforces collaborative decision-making, clarifies ongoing responsibilities where thresholds are not met, and establishes clear expectations for shared risk management and accountability across education, children's social care, health and policing.

72. Our members emphasise that neurodevelopmental conditions, including autism, should never be viewed as indicators of risk in themselves. Consistent with the SEND Code of Practice **(MM/19 – ASCL000012)**, Equality Act 2010, KCSIE 2026 **(MM/01 – DFE000262)**, Working Together to Safeguard Children **(MM/02 – DFE000263)**, and NICE guidance, assessments must be individualised, evidence-based and free from discrimination. However, practitioners report uncertainty when distinguishing between behaviours associated with neurodevelopmental conditions, mental ill health, and behaviours that may indicate an escalating risk of serious violence. Access to timely specialist clinical advice is often limited, increasing professional uncertainty. ASCL would support the development of national guidance, co-produced with clinical experts, to help professionals differentiate these presentations and ensure that risk assessments remain proportionate, evidence-based and focused on observable behaviours and context rather than diagnosis alone.

73. Our members recognise the importance of timely and proportionate information sharing, as set out in Working Together to Safeguard Children **(MM/02 – DFE000263)**, Keeping Children Safe in Education 2026 **(MM/01 – DFE000262)**, and the Information Sharing Advice for Practitioners **(MM/18 – ASCL000011)**. However, they report that current systems are inconsistent across agencies, with differing recording processes, limited interoperability and variable feedback following referrals. This can lead to duplicated recording, delays in decision-making and uncertainty about how concerns have been assessed or managed. ASCL would support improved interoperability between safeguarding systems and strengthened statutory expectations for timely information sharing and feedback between partner agencies to enable more coordinated and effective risk management.

74. Our members generally understand that safeguarding considerations can justify information sharing without consent where there is a lawful basis and a risk of harm, in line with Working Together to Safeguard Children (**MM/02 – DFE000263**), Keeping Children Safe in Education 2026 **(MM/01 – DFE000262**), and the Information Sharing Advice for Practitioners **(MM/18 – ASCL000011**). However, some practitioners continue to express uncertainty about the lawful application of data protection legislation, particularly in complex or emerging cases. This can result in overly cautious information-sharing practices. ASCL would support strengthened national training and statutory guidance reinforcing that proportionate, necessary information sharing to safeguard children and others is supported by the Data Protection Act 2018 and UK GDPR, helping to increase professional confidence and reduce unnecessary hesitation.

75. Confidence varies according to local arrangements, established professional relationships and previous experience. While members are generally confident in identifying when to engage children's social care, the police and Prevent, there is less certainty regarding the role of specialist mental health services, community safety partners, youth justice and other agencies involved in managing violence fixation. This variability can lead to inconsistent referral practice and uncertainty about responsibility. ASCL would support the publication of a nationally agreed referral framework, aligned with Keeping Children Safe in Education 2026 **(MM/01 – DFE000262**), Working Together to Safeguard Children **(MM/02 – DFE000263)** and Prevent guidance **(MM/04 – ASCL000001**), clearly setting out the roles and responsibilities of education, children's social care, health, policing, Prevent, youth justice and community safety partners in responding to concerns about violence fixation.

76. Our members report that the principal barriers to effective information sharing are inconsistent agency thresholds, limited feedback following referrals, incompatible recording systems, capacity pressures and variable interpretation of information governance requirements. These factors can delay decision-making, create uncertainty regarding case ownership and result in fragmented multi-agency responses. Although statutory guidance promotes timely and proportionate information sharing, implementation remains inconsistent across local areas. ASCL would support a review of operational barriers, alongside strengthened national guidance to improve interoperability, align thresholds and promote consistent application of information-sharing legislation across partner agencies.

77. Our members report that information sharing is often more complex where pupils live in one local authority area and attend school in another, or where families move between areas. Variations in local thresholds, procedures and agency practice can delay information sharing, reduce clarity over lead responsibility and hinder coordinated safeguarding responses. While Keeping Children Safe in Education 2026 **(MM/01 – DFE000262**) and Working Together to Safeguard Children **(MM/02 – DFE000263)** emphasise the importance of timely information sharing and effective transition arrangements, practice remains inconsistent across local

authority boundaries. ASCL would support strengthened national expectations for the transfer of safeguarding information, with clear responsibilities for cross-border cases, school moves and transitions to ensure continuity of risk assessment and multi-agency oversight. Online safeguarding recording systems do help mitigate some of these risks

78. Our members recognise that timely psychological, behavioural, therapeutic and family-based interventions can play a significant role in reducing risk where they are appropriately targeted and delivered. However, access to CAMHS, educational psychology, specialist behavioural support and other therapeutic services remains inconsistent across England, with lengthy waiting times and variable local provision. As a result, schools frequently manage escalating concerns for extended periods while awaiting assessment or intervention. Barriers include limited service capacity, high referral thresholds, workforce shortages and inconsistent access to specialist expertise. ASCL would support increased investment in accessible therapeutic, behavioural and psychological services, alongside earlier intervention pathways, to reduce escalation and lessen reliance on crisis responses.

THE ROLE OF THE ONLINE ENVIRONMENT

79. Our members recognise that online platforms can facilitate and intensify violence fixation by exposing children and young people to algorithmically recommended content, violent online communities, misogynistic and extremist narratives, and AI-generated material that normalises or glorifies violence.

80. Practitioners increasingly identify online environments as reinforcing existing vulnerabilities, encouraging social isolation, and accelerating progression from curiosity to fixation. Keeping Children Safe in Education 2026 **(MM/01 – DFE000262)** places greater emphasis on emerging technologies, including AI-generated content and technology-facilitated harm, reflecting the evolving online risk landscape. ASCL supports continued strengthening of legislation, regulation and statutory guidance to address emerging online harms, ensuring practitioners are equipped to recognise and respond to risks associated with AI-generated content, recommendation algorithms and online communities that promote or normalise violence.

81. School leaders tell us they are struggling to 'keep up' with the risks posed by online platforms. As referenced above, ASCL has responded to member concerns by developing reports that support knowledge building of school staff. For example the 'Safer Scrolling' report (produced jointly by UCL, University of Kent and ASCL) **(MM/12 – ASCL000007)** helped our members to understand how algorithms amplify and gamify toxic messaging. It also highlighted the notion (still not fully understood in schools at the time) of online grooming and explained for school

leaders how this can impact students. Leaders recognise the significant workloads shouldered by the Designated Safeguarding Lead and the challenge that rapidly changing technology poses for the sustainability of this role.

82. Our members consider filtering and monitoring systems to be an important component of online safeguarding within school networks and recognise the strengthened expectations set out in Keeping Children Safe in Education 2026 **(MM/01 – DFE000262)** and the DfE Filtering and Monitoring Standards **(MM/13 – ASCL000008)**. However, they also acknowledge their limitations. Much of the most concerning online activity occurs on personal devices, through encrypted platforms or outside school hours, beyond the reach of school-based technical controls. ASCL therefore views filtering and monitoring software as one element of a wider safeguarding strategy that combines effective technical controls with digital literacy, professional curiosity, staff vigilance, early identification of risk and robust multi-agency safeguarding practice. Continued national guidance should reflect this balanced approach and support schools to respond to evolving online risks.

83. Our members identify concerning online behaviour primarily through professional observation, changes in presentation, peer reports, disclosures and wider safeguarding concerns, rather than through technology alone. While filtering and monitoring systems can support identification of risk within school networks, they do not capture much of the online activity that occurs on personal devices or outside school. Consequently, practitioners often identify concerns only after behaviours have escalated. ASCL would support the development of national guidance to help schools recognise behavioural indicators associated with online violence fixation, alongside clear advice on lawful, proportionate and rights-based approaches to monitoring, information sharing and intervention.

84. Our members have established safeguarding procedures for identifying, recording and responding to online concerns, including the use of filtering and monitoring systems, safeguarding reporting processes, risk assessment, information sharing and referrals to external agencies where appropriate. Responses are guided by Keeping Children Safe in Education 2026 **(MM/01 – DFE000262)** and Working Together to Safeguard Children **(MM/02 – DFE000263)**. However, practitioners report challenges where harmful content is lawful, hosted overseas, shared via encrypted platforms or falls outside existing enforcement mechanisms. Schools also experience limited feedback following reports to online platforms or statutory agencies, making it difficult to assess ongoing risk. ASCL would support strengthened national reporting arrangements between education, technology companies and law enforcement, alongside clearer escalation pathways and timely feedback to schools when significant online harms are reported.

85. Our members share information about concerning online behaviours through established safeguarding processes, including referrals to children's social care, the police, Prevent, and other relevant safeguarding partners, in line with Working Together to Safeguard Children **(MM/02 – DFE000263)** and the Information Sharing Advice for Practitioners **(MM/18 – ASCL000011)**. However, the effectiveness of these arrangements often depends on local relationships and established communication pathways. Practitioners report variable responses, inconsistent mechanisms for sharing online safeguarding intelligence, and limited feedback once concerns have been referred. ASCL would support nationally agreed mechanisms to enable timely, lawful and proportionate information sharing between schools, policing, safeguarding partnerships and, where appropriate, online platforms, supported by clear expectations for communication and feedback.

KNIVES AND BLADED ARTICLES

86. Our members are generally confident in responding to incidents involving knives or bladed articles through established safeguarding, behaviour and serious violence procedures. Most schools have clear processes for searching, confiscation, recording, information sharing and referral to external agencies, supported by statutory guidance. However, confidence is lower when responding to emerging risks such as crossbows, homemade or improvised weapons, 3D-printed weapons and online methods of weapon acquisition, where guidance and training are less well developed. ASCL would support a review of existing statutory guidance to ensure it reflects the evolving nature of weapon-related risks and provides practical advice on risk assessment, multi-agency working, information sharing and appropriate responses to both traditional and emerging threats

87. Schools record weapon incidents through behaviour and safeguarding systems, but recording approaches vary considerably. There is no national statutory reporting framework, schools follow for knife crime. Recording expectations are articulated through KCSIE. There is no consistent national dataset that enables meaningful benchmarking or identification of emerging trends. ASCL would support a consistent national framework for recording and analysing weapon-related safeguarding incidents to support evidence-informed policy and early intervention.

IMPROVEMENTS

88. ASCL considers that the most effective improvements would build on existing statutory safeguarding arrangements rather than create a wholly new framework. The statutory principles already exist across Keeping Children Safe in Education (KCSIE) 2026 **(MM/01 – DFE000262)**, Working Together to Safeguard Children **(MM/02 – DFE000263)**, the

Prevent Duty Guidance **(MM/04 – ASCL000001)**, the Online Safety Act 2023, the Information Sharing Advice for Practitioners **(MM/18 – ASCL000011)**, and the Education Act. The challenge for education is not the absence of statutory duties, but the absence of a coherent, nationally consistent operational framework for managing concerns relating to violence fixation.

89. ASCL would therefore recommend the development of a single integrated national framework for education that brings together existing statutory guidance into one practical model covering identification, assessment, referral, information sharing, intervention, multi-agency working and ongoing risk management. This framework should complement, rather than replace, existing safeguarding duties and provide greater consistency across local areas.

90. Specifically, our members would support:

- **A nationally agreed definition and shared terminology** relating to violence fixation, enabling consistent understanding and reducing variation in practice across education and partner agencies.
- **Clear referral pathways and thresholds**, supported by national guidance setting out the respective roles of education, children's social care, health, policing, Prevent, youth justice and community safety partners.
- **A clearly defined lead professional model**, aligned with the principles of *Working Together to Safeguard Children*, identifying which agency should hold responsibility for coordinating complex cases and the circumstances in which leadership should transfer between agencies as risk changes. Schools should remain key safeguarding partners but should not be expected to coordinate complex multi-agency risk management without statutory authority.
- **A nationally recognised multi-agency risk assessment framework**, supported by accompanying practice guidance and training, enabling agencies to undertake consistent, evidence-based assessments and develop coordinated management plans.
- **Strengthened expectations for information sharing**, including improved interoperability between safeguarding systems, clearer expectations regarding feedback following referrals, and consistent application of the **Data Protection Act 2018** and **UK GDPR** to reduce unnecessary professional uncertainty.
- **Improved arrangements for cross-boundary working**, ensuring that safeguarding information, risk assessments and case responsibility transfer seamlessly where children attend school in one local authority but reside in another, or move between education settings.

- **Enhanced access to specialist advice and early intervention**, including timely input from CAMHS, educational psychology, specialist behavioural services and other clinical expertise, recognising that schools frequently manage escalating concerns while awaiting assessment or intervention.
- **Comprehensive practitioner training**, building on **KCSIE** and **Prevent** requirements, to improve confidence in recognising behavioural indicators associated with violence fixation, distinguishing these from neurodevelopmental conditions or mental ill health, understanding lawful information sharing, assessing online harms and undertaking appropriate referrals.
- **Strengthened online safeguarding guidance**, reflecting the evolving risks associated with algorithm-driven content, AI-generated material, violent online communities, misogynistic influencers, encrypted platforms and emerging methods of online radicalisation and attack planning. Technical filtering and monitoring should continue to be recognised as one element of a broader safeguarding strategy alongside education, professional curiosity and effective multi-agency working.
- **Updated guidance on serious violence and weapons**, ensuring statutory guidance keeps pace with emerging risks, including crossbows, homemade and improvised weapons, 3D-printed weapons and evolving methods of online weapon acquisition.

91. Taken together, these recommendations would strengthen consistency across England while making best use of existing statutory structures. Rather than creating new governance arrangements, ASCL considers that embedding a nationally consistent operational framework within the existing safeguarding system would improve early identification, clarify agency responsibilities, strengthen multi-agency decision-making, support lawful and timely information sharing, and ensure that children presenting with concerns relating to violence fixation receive coordinated, proportionate and effective intervention at the earliest opportunity.

OTHER MATTERS

92. Practitioners consistently emphasise that education has a critical role in early identification but cannot manage complex violence fixation in isolation. Sustainable improvements will require clearer national frameworks, greater investment in specialist services, stronger multi-agency accountability and recognition that prevention is more effective than crisis response.

93. ASCL wishes to ensure future policy is developed in partnership with education professionals, safeguarding leaders, children, families, policing, health and specialist researchers, recognising that effective prevention depends upon sustained collaboration rather than isolated agency responses.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings many brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed **SIGNATURE**

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Dated 30 July 2026

THE SOUTHPORT INQUIRY

INDEX TO THE WITNESS STATEMENT OF
MARGARET MULHOLLAND
(THE ASSOCIATION OF SCHOOL AND COLLEGE LEADERS)

Exhibit No	Inquiry reference No.	Document description
1	DFE000262	Keeping Children Safe in Education 2026
2	DFE000263	Working Together to Safeguard Children 2026
4	**ASCL000001**	Prevent duty guidance: for England and Wales
5	**ASCL000002**	ASCL Response – information sharing duty
6	**ASCL000003**	ASCL Response – KCSIE 2026
7	**ASCL000004**	The ASCL Blueprint for a fairer education system – 2021
10	**ASCL000005**	Ofsted Inspection Framework
11	**ASCL000006**	ISI Inspection Framework
12	**ASCL000007**	Safer Scrolling Report
13	**ASCL000008**	DfE Filtering and Monitoring Standards
15	**ASCL000009**	Searching , Screening and Confiscation – DfE Advice for Schools
16	**ASCL000010**	Behaviour in Schools – DfE Advice
18	**ASCL000011**	Information Sharing Advice – DfE advice – practitioners
19	**ASCL000012**	SEND Code of Practice