Minerva Learning Trust

STOCKSBRIDGE HIGH SCHOOL

This is Just the Start

Child Protection and Safeguarding Policy

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Changes to this edition

New policy template in line with changes to KCSIE 2026

1. Purpose

Minerva Learning Trust (MLT) is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of our schools' premises. We implement a trust-wide preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken and that healthy relationships are promoted. The trust is also committed to a zero-tolerance policy with regards to sexual harassment and violence.

This policy has been created to outline a clear framework relating to any aspects of safeguarding within the trust and should be followed by:

- All members of staff.
- Any school within the trust.
- Any local governing bodies and committees of the trust.
- Individual trustees, the board of trustees and Members.
- The trust as a whole, including trust staff.
- Any associate members of the board of trustees and/or its committees.

2. Aims

Minerva Learning Trust, all its employees, governors and volunteers, are committed to promoting the welfare of all children and young people. This policy reflects its responsibilities to ensure all members of the Trust create a safe environment within which children and young people can learn.

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and trustees in the trust and is consistent with the procedures of the three safeguarding partners. These are the CCG (Clinical Commissioning Group), the Police and the Local Authority Safeguarding Children Partnership. Appropriate information sharing, in line with the Data Protection Act and GDPR, across our safeguarding partners is key to the successful implementation of this policy.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the board of trustees, headteachers and trust and school staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to an appropriately trained person, e.g. the DSL or deputy DSL (DDSL) within their school.
- Ensuring pupils are taught how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil who has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that headteachers and any new staff and volunteers within the trust are only appointed once all the appropriate checks have been satisfactorily completed.

3. Acronyms

Acronym	Long form	Description
AI	Artificial Intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child Criminal Exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's Social Care Services	The branch of the local authority that deals with children's social care.
CSE	Child Sexual Exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data Protection Officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated Safeguarding Lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, Health and Care Plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
FGM	Female Genital Mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour Based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and

Acronym	Long form	Description
		Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping Children Safe in Education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local Authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked After Children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, Gay, Bisexual, Transgender and Queer Plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi Academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously Looked After Children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, Social and Health Education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, Sex and Health Education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single Central Record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special Educational Needs Coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior Leadership Team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual School Head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

4. Links to other documents

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Children's Wellbeing and Schools Act 2026

Statutory guidance

- Home Office 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE 'Working Together to Safeguard Children'
- DfE 'Disqualification under the Childcare Act'
- DfE 'Keeping children safe in education'
- DfE 'Working together to improve school attendance'
- HM Government 'Multi-agency statutory guidance on female genital mutilation'
- HM Government 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE 'What to do if you're worried a child is being abused'
- DfE 'Child sexual exploitation'
- DfE 'Filtering and monitoring standards for schools and colleges'
- DfE 'Information sharing'
- DfE 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE 'Teachers' Standards'
- DfE 'Recruit teachers from overseas'
- DfE 'Meeting digital and technology standards in schools and colleges'

- Department of Health and Social Care 'Virginity testing and hymenoplasty: multi-agency guidance'
- DfE 'Restrictive interventions, including the use of reasonable force, in schools'

It also links to the following Trust policies:

- Trust Data Protection Policy
- Trust Records Management Policy
- Trust Supporting Students with Medical Needs Policy
- Trust Allergy Policy
- Trust Suspensions and Exclusions Policy
- Trust Screening, Searching and Confiscation Policy
- Trust Staff Code of Conduct Policy
- Trust Complaints Procedure
- Trust Children Looked After Policy
- Trust Whistleblowing Policy
- Trust Recruitment Policy
- Trust Record Retention Policy
- Trust Low-level Concerns Policy
- Trust Managing Allegations of Abuse Against Staff
- Trust Staff Code of Conduct
- Trust Disciplinary Policy
- Trust Sexual Health Policy
- Trust Pregnant Pupil and School-age Parent Policy
- Trust Mental Health and Wellbeing Policy
- School Lettings Policy
- School Behaviour Policy
- School Anti-bullying Policy
- School Health and Safety Policy
- School SEND Policy
- School Attendance Policy
- School Online Safety Policy
- School Curriculum Policy

This safeguarding policy also reflects the Local Authority's agreed multi-agency procedures that have been put in place by the three safeguarding partners. Local Authority Children Safeguarding Partnerships have developed a comprehensive set of policies, and these have been used to inform this policy.

5. Important Contacts

Below are the relevant Safeguarding contact details for the school, Minerva Learning Trust and other relevant safeguarding contacts.

Role/ Organisation	Name	Contact details
Designated Safeguarding Lead (DSL)	David Williams	dwilliams@stocksbridge-mlt.co.uk
Safeguarding and Inclusion Manager (DDSL)	Danielle Briggs	dbriggs@stocksbridge-mlt.co.uk
Other contactable Deputy Designated Safeguarding Leads (DDSL's)	Claire Johnson Matt Clark Paul Schuller	cjohnson@stocksbridge-mlt.co.uk mclark@stocksbridge-mlt.co.uk pschuller@stocksbridge-mlt.co.uk
Children Looked After (CLA) Designated Teacher	Claire Johnson	cjohnson@stocksbridge-mlt.co.uk
Online Safety Co-ordinator	Paul Schuller	pschuller@stocksbridge-mlt.co.uk
Headteacher	David Williams	dwilliams@stocksbridge-mlt.co.uk
Local Lead Safeguarding Governor	Zoe Wilson	enquires@stocksbridge-mlt.co.uk
Chair of Local Governing Body	Janet Kilburn	enquires@stocksbridge-mlt.co.uk
Chief Executive Officer and Trust Safeguarding Lead	Bev Matthews	enquiries@minervalearningtrust.co.uk
Deputy Chief Executive Officer Deputy Trust Safeguarding Lead	Simon Barber	enquiries@minervalearningtrust.co.uk
Chief Operating Officer	Nicola Gregory	enquiries@minervalearningtrust.co.uk
Chair of Trust Board	John Doyle	enquiries@minervalearningtrust.co.uk
Lead Trustee for Safeguarding	Dawn Walton	enquiries@minervalearningtrust.co.uk
Trust Safeguarding and Inclusion Manager and Trust DSL	Lucy McGann	enquiries@minervalearningtrust.co.uk
Local Authority Designated Officer (LADO) Sheffield		0114 2734855, email lado@sheffield.gov.uk
Local Authority Designated Officer (LADO) Derbyshire		01332 642376
Sheffield Safeguarding Hub		0114 2734855
Derbyshire Starting Point Consultation and Advice Service		01629 535353
NSPCC	National Helpline	0808 800 5000
ChildLine	National Helpline	0800 11 11
Child Exploitation and Online Protection (CEOP)	National Helpline	0370 496 7622

6. Definitions

The terms **"children"** and **"child"** refer to anyone under the age of 18.

For the purposes of this policy, **"safeguarding and protecting the welfare of children"** is defined as:

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

For the purposes of this policy, **"consent"** is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, **"sexual violence"** refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **"sexual harassment"** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:

    - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
    - Sharing unwanted explicit content.
    - Upskirting.
    - Sexualised online bullying.
    - Unwanted sexual comments and messages, including on social media.
    - Sexual exploitation, coercion, and threats.

For the purposes of this policy, **"upskirting"** refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, **"making or sharing of nude or semi-nude images and/or videos"** refers to the creation, possession or sharing of nude or semi-nude images and/or videos involving anyone under the age of 18. This includes consensual and non-consensual sharing, AI-generated content where it depicts a child, and content shared online or offline.

"Deepfakes" and **"deep nudes"** refer to digitally manipulated or AI-generated images, audio or videos that falsely depict a person. Where these involve nude or semi-nude images of a child, they will be managed in accordance with the school's procedures for responding to the making or sharing of nude or semi-nude images and/or videos.

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, **"physical abuse"** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, **"emotional abuse"** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being

imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing, causing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

7. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and Governors in Minerva Learning Trust and each school within it and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities and online activities. Specific responsibilities in all areas of the organisation are highlighted below.

Trust Board

- Carrying out their functions to safeguard and promote the welfare of children in all schools within the MAT.
- Understanding their safeguarding duties and having regard to any statutory guidance on safeguarding issued by the Secretary of State.
- Taking strategic leadership responsibility for the trust's safeguarding arrangements.
- Ensuring the suitability of staff, supply staff, volunteers, contractors, and proprietors.
- Making sure that all schools within the trust have effective safeguarding policies, procedures and training in place that comply with their statutory obligations.
- Ensuring that the policies and procedures adopted by local governing boards, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.
- Having procedures in place to monitor the implementation of safeguarding policies and procedures regularly.
- Ensuring that all governors and trustees receive appropriate safeguarding and child protection training at induction, and that this training is updated regularly thereafter.
- Commissioning independent safeguarding audits of each school and the trust as a whole.

- Receiving regular reports from the CEO on safeguarding to the board of trustees delegating operational responsibilities.
- Ensuring that every school within the trust complies with its duties under the above child protection and safeguarding legislation.
- Guaranteeing that each school within the trust contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirming that the trust's safeguarding arrangements take into account the procedures and practices of the relevant LAs as part of the inter-agency safeguarding procedures.
- Ensuring each school within the trust facilitates a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Certifying that there are procedures in place within the trust to handle allegations against staff, supply staff, volunteers and contractors.
- Confirming that there are procedures in place within the trust to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in a regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guaranteeing that there are procedures in place within the trust to handle pupils' allegations against other pupils.
- Guaranteeing that there are systems in place for pupils to express their views and give feedback within the trust.
- Ensuring the trust has put in place appropriate safeguarding responses for pupils who go missing from a school within the trust, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and preventing the risk of their disappearance in future.
- Ensuring that all members of the board of trustees have been subject to an enhanced DBS check.
- Creating a culture within the trust where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring that robust safeguarding records are kept in each school and the effectiveness of recordkeeping is monitored.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements, the Date (Use and Access) Act 2025
- Ensuring each school within the trust has appropriate arrangements are in place to keep children safe where school facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks.
- Ensuring each school within the trust has safeguarding requirements that are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.
- Ensuring each school within the trust has robust health and safety and emergency evacuation procedures.

Trust Board Safeguarding Lead Trustee

- Ensure safeguarding practices, policies and procedures are in place across the Trust and that schools are fully compliant and meeting statutory requirements.
- Work with headteachers and Lead Local Governor for Safeguarding to ensure that their school is fully compliant.

- Undertake the role as set out in the Lead Local Governor and Lead Trustee reporting schedule, the Trust Scheme of Delegation, Trust Governance Handbook and Trust Governance Business Planner.

Trust Executive Team

- Lead on the Trust-wide strategic approach for Safeguarding and ensure a culture of 'it could happen here' is embedded across all areas of the organisation
- Ensure that each school within the Trust has appropriate Safeguarding and related policies in place which link to the Trust's and the relevant Local Authority Safeguarding Children Board's overarching safeguarding expectations
- Ensure each school has an identified and appropriately trained Designated Safeguarding Lead (DSL) in place and that the relevant training is up to date
- Facilitate an annual external safeguarding audit of all schools within the Trust to ensure compliance with Trust and statutory guidelines.
- Facilitate training opportunities trust-wide to ensure consistency in the level of training and expertise in safeguarding across the trust's schools.
- Understanding the local criteria for action and the local protocol for assessment for each school within the trust and ensuring these are reflected in the trust's policies and procedures.
- Complying with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensuring that mechanisms are in place to assist staff in schools to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensuring schools within the trust appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Ensuring schools within the trust appoint one or more DDSLs to provide support to the DSL and ensuring that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Ensuring that procedures are in place within the trust so that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensuring that arrangements are in place within the trust to liaise with LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Ensuring all relevant persons are aware of the trust's safeguarding arrangements, including the board of trustees itself, and each school's DSL, DDSL(s) and SLT.
- Adhering to statutory responsibilities by ensuring pre-employment checks are conducted on all staff within the trust who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensuring each school within the trust has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Making sure that at least one person on any appointment panel within the trust has undertaken safer recruitment training.
- Ensuring that all staff within the trust receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Have overall strategic responsibility for filtering and monitoring, seek assurance that the filtering and monitoring standards for schools are being met, and that the effectiveness of filtering and monitoring systems is reviewed at least annually, including that appropriate checks are undertaken on all internet-connected devices and a record of those checks is maintained.

- Ensuring that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff within the trust.
- Appointing a designated teacher for LAC within each school to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Introducing mechanisms to assist staff within the trust in understanding and discharging their roles and responsibilities.

The Local Governing Body

- The governing board will approve the school's policy at each review, ensure it complies with the model Trust level policy and hold the Headteacher to account for its implementation
- An individual member of the Local Governing Body should be designated as the school's Lead Governor for Safeguarding, who will undertake the role in accordance with the Lead Local Governor and Trustee guidance and reporting schedule.

- The Lead Governor for Safeguarding will champion issues to do with safeguarding and child protection within the school, liaise and meet with the DSL, conduct relevant school visits and provide relevant information and reports to the Local Governing Body and the Lead Trustee for Safeguarding at least twice per year
- The governing board will appoint a Lead Governor to monitor the effectiveness of this policy in conjunction with the full governing board.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- All Governors will read Keeping Children Safe in Education Part 1.

The Headteacher:

- Ensure that the policies and procedures adopted by the Trust and governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Ensure that appropriate filtering and monitoring systems are implemented and that staff understand their roles and responsibilities in relation to filtering and monitoring.
- Provide staff with the appropriate policies and information upon induction.
- Ensure that the school practises safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in Keeping Children Safe in Education and the Education (Independent School Standards) (England) Regulations 2014 as amended.
- Ensure that the school carries out all necessary checks on the suitability of people who serve as members and/or on the governing board.
- Ensure that, where the school ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS within one month.
- Ensuring that appropriate contact with pupils does not prevent staff members from using reasonable force and other restrictive interventions.
- Ensure that appropriate arrangements are in place to provide effective DSL cover during school hours so that safeguarding concerns can always be responded to promptly.
- Ensure that staff are aware of how and when to act on concerns and that they always work in a safe and appropriate manner
- Ensure all staff are updated on Keeping Children Safe in Education guidance through delivery of annual safeguarding training for all staff and sign to say they have read and understood Part 1 of the guidance

- Making sure that pupils in each school are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Putting in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Where there is a safeguarding concern within the school, ensuring there are procedures in place to take the child's wishes and feelings are taken into account when determining what action to take and what services to provide
- Ensuring systems are in place within the school for pupils to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible
- Ensuring that staff within the school are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Guaranteeing that volunteers within the school are appropriately supervised.
- Ensuring that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child and teenage relationship abuse within the trust.
- Ensure that the school has effective arrangements in place for community-based early help and targeted family help, and that staff understand their role in identifying pupils who may benefit from support before statutory intervention.
- Ensuring that the designated teacher for LAC within each school works with the virtual school head(s) (VSH) to discuss how the pupil premium funding can best be used to support LAC.
- Making sure that staff members within the trust have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.

The DSL:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Coordinating the school's approach to community-based early help and targeted family help.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns.
- Refer cases:
    - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
    - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
    - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
    - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance

- Act as a point of contact with the safeguarding partners.
- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically, including through community-based early help, family help and statutory services where appropriate.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:

    - Ensuring that the school knows which pupils have or had a social worker.
    - Understanding the academic progress and attainment of these pupils.
    - Maintaining a culture of high aspirations for these pupils.
    - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
    - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.

- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training and update this training annually.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.

- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act 2025.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

Designated Teacher for LAC:

- Promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Read and understand at least 'Part one' of KCSIE.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the school's arrangements for community-based early help and targeted family help and understand their role in identifying pupils who may benefit from support before statutory intervention.
- Be aware of local safeguarding partnership arrangements and understand the referral pathways to CSCS.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Promote dialogue and understanding, and ensure all pupils feel listened to and understood.
- Empower pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes and challenge it in a professional way if it occurs.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that, including technology-facilitated abuse, can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.
- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

The Central ICT Managed Service Team

- Review filtering and monitoring provision at least annually in line with DfE requirements set out in 'Meeting digital and technology standards in schools and colleges '
- Complete an annual digital audit.
- Ensure any changes required following the review are implemented effectively.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Ensure all schools and settings have effective monitoring strategies in place that meet their safeguarding need.
- Liaise with the DSL to ensure they are aware of filtering and monitoring systems in place.
- Contribute towards the delivery of staff training and support, where necessary, and support DSLs in the development of staff training regarding filtering and monitoring systems.

8. Multi-agency working

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

The school will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

The school will work collaboratively with families and partner agencies to safeguard and promote pupils' welfare, through community-based early help and targeted family help, and by contributing to coordinated multi-agency plans to support children and families.

Where a child may benefit from family help, the school will work with partner agencies and contribute to multi-agency assessments and plans.

The school will allow CSCS from the host LA and, where appropriate, the placing LA, access to pupils to enable them to undertake or consider assessments under sections 17 or 47 of the Children Act 1989.

The school will also be mindful of the importance of inter-agency working in identifying and preventing CSE, CCE and other forms of extra-familial harm.

The school will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspective to evaluate provision.
- Prioritising and sharing resources depending on pupils' needs.
- Understanding its role within the local safeguarding arrangements.
- Mutually and constructively challenging other's assumptions in a respectful manner.

Information sharing

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for community-based early help or family help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will be made aware that there may be legal or statutory requirements to share information for safeguarding purposes when requested by relevant agencies.

Where decisions are made about sharing or withholding information, these will be based on consideration of the risks to the pupil and, where appropriate, the rationale for decisions will be recorded.

9. Support before statutory intervention

Support before statutory intervention means providing help as soon as a problem emerges, at any point in a child's life. This may include support from universal services, community-based early help, or targeted family help, depending on the child's level of need.

Any pupil may benefit from support before statutory intervention; however, staff will be particularly alert to the potential need for community-based early help or family help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have a mental health need.
- Are young carers.
- Are pregnant or are a parent themselves.
- Have exhibited early signs of abusive, violent or harmful behaviours.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Have been repeatedly removed from the classroom.
- Have experienced multiple suspensions.
- Are on a part-time timetable.
- Are at risk of being permanently excluded or are in alternative provision or a pupil referral unit.
- Are at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation.
- Are at risk of being radicalised into terrorism.
- Have family members in custody or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of honour or faith-based abuse, such as FGM or forced marriage.
- Are privately fostered.

The school will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from community-based early help or family help.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where family help or community-based early help is appropriate. This includes liaising with other agencies and arranging a multi-agency family help assessment where appropriate, following local safeguarding partnership procedures.

Staff may be required to support other agencies and professionals during a community-based early help or family help assessment and, in some circumstances, may act as the Lead Practitioner, where appropriate and in accordance with local arrangements. All cases will be reviewed regularly and consideration given to referral to CSCS where the child's circumstances do not improve or where the level of risk increases.

Staff will be familiar with the local thresholds for community-based early help, family help, Section 17 (Children in Need) and Section 47 (Child Protection) and will follow local safeguarding partnership procedures when making referrals.

10. Abuse, neglect and exploitation

All staff will be aware of the indicators of abuse, neglect, exploitation and modern slavery and will understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

The school will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. The school will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

The school will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all pupils.

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. Staff will understand that, in most cases, multiple issues will overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside The school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of harms outside their families (extra-familial harms).

These harms include, but are not limited to:

- Sexual abuse, including harassment and exploitation.
- Domestic abuse in their own intimate relationships, including physical, sexual, emotional abuse, and stalking.
- Criminal exploitation, including financial exploitation.
- Serious youth violence.

- County lines.
- Radicalisation.

All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues and that risks such as abuse can take place online as well as face to face.

Staff will also understand that child-on-child abuse can occur online and can take the form of:

- Abusive, harassing, misogynistic or misandrist messages.
- The non-consensual making or sharing of nudes or semi-nudes, particularly within group chats.
- Sharing of abusive images and pornography to those who do not wish to receive such content.

Staff will always speak to the DSL or deputy if they are unsure about something in relation to abuse, neglect or exploitation.

11. Specific safeguarding issues

Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, **"domestic abuse"** is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. **"Abusive behaviour"** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. **"Personally connected"** includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to".

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

Children absent from education

A child who is absent from education can be a vital warning sign of abuse, neglect, exploitation, mental health concerns and other safeguarding issues, including CCE and CSE. The school will ensure that the response to children persistently absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from The school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

The school will follow the DfE's guidance on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school either in year or at the usual transition points, the school will use a secure internet system to securely transfer pupils' data and safeguarding information.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance by following LA CME processes. The LA will direct when a school can remove a child from the admissions register in these situations.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

Child abduction and community safety incidents

For the purposes of this policy, **"child abduction"** is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child criminal exploitation (CCE)

For the purposes of this policy, **"child criminal exploitation"** is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, through provision of training and ongoing information, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.

County lines

For the purposes of this policy, **"county lines"** refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber-crime

For the purposes of this policy, **"cyber-crime"** is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme. Staff will be trained to identify the warning signs.

Child sexual exploitation (CSE)

For the purposes of this policy, **"child sexual exploitation"** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Modern slavery

For the purposes of this policy, **"modern slavery"** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

FGM

For the purposes of this policy, **"FGM"** is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called **"'honour-based' abuse (HBA)"**, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

Forced marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.
All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and CSCS.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The Trust and school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

Radicalisation
For the purposes of this policy, **"radicalisation"** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, **"extremism"** refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, **"terrorism"** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause.
Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will arrange formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent Duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **"the Prevent duty"**. The Prevent duty will form part of the school's wider safeguarding obligations.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Primary School Pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Secondary school and post 16 Pupils will be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been suspended, spent time in AP or permanently excluded from school.
- Having experienced child maltreatment.
- Having used drugs or alcohol in early adolescence.
- Having Previously been a victim or previously perpetrated violence.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

The school will cooperate with safeguarding partners, CSCS, the police and other relevant agencies where appropriate.

Sexually motivated incidents

The school will remain aware that not all instances involving the making or sharing of nude or semi-nude images will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing the nude or semi-nude images. These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered money or gifts.

- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

Financially motivated incidents

Financially motivated incidents involving the making or sharing of nude or semi-nude images involving adults may also be called **"sextortion"**, where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, e.g. paying money. In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
- Use images that have been stolen from the child or young person, e.g. via hacking.
- Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing sexual images first.
- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked in order to obtain images, personal information, and contacts.
- Being blackmailed into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.

12. Child-on-child abuse, including sexual harassment and sexual violence

For the purposes of this policy, **"child-on-child abuse"** is defined as abuse between children. The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

All staff will be trained in and aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up". Staff will understand that recognising behaviours early and putting in place timely, evidence-based support can be vital in preventing child-on-child abuse.

All staff will be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.

- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Serious physical assault and harm, or threat of harm with a weapon – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence such as rape, assault by penetration and sexual assault – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment such as sexual comments, remarks, jokes and online harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual making or sharing of nudes and semi-nudes.
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their private areas to obtain sexual gratification.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group – this may also include an online element.
- Prejudiced based harm including faith based and racial abuse.

Some children may be particularly vulnerable to child-on-child abuse. The school recognises that children with SEND or certain medical or physical health conditions may face additional safeguarding challenges and may be more vulnerable to abuse, bullying and prejudice-based bullying. Staff will recognise that children with disabilities are three times more likely to be abused than their peers and will consider whether additional pastoral or safeguarding support is required.

All pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability. The school will give special consideration to, amongst others, children who:

- Have SEND.
- Are vulnerable to being bullied.
- Are looked after or living in unsupportive home situations.

The DSL will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school recognises that harmful behaviours exist on a continuum and will respond proportionately, considering the age, developmental stage, intent, frequency and seriousness of the behaviour, as well as the needs of all children involved.

13. Online safety and technology

The school will always adhere to the Online Safety Policy. Each school will appoint a designated Online Safety Coordinator.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

Staff training in online safety will cover the four categories of risk as outlined in KCSIE:

- Content - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation, and conspiracy theories.
- Contact - Training will address the risks of harmful online interaction with other users or generative AI applications that simulate this. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.
- Conduct - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as making, sending, or receiving explicit images, including those generated using AI and instances of online bullying.
- Commerce - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams.

Any concerns that pupils or staff may be at risk will be reported promptly through the appropriate safeguarding channels and will be managed by the DSL or Headteacher.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the school's Online Safety Policy. The appropriateness of the school's filters and monitoring systems will be informed by the 'Filtering and monitoring standards', the 'Cyber security standards for schools and colleges', and the risk assessment required by the Prevent Duty. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the filtering and monitoring standards published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding each school's approach to online safety can be found in the Online Safety Policy.

Communicating with parents

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor internet use.

The school will also make it clear to parents what their children are being asked to do online for school.

Reviewing online safety

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

The school will also review the effectiveness of its filtering and monitoring systems at least annually. This review will be led by the member of the SLT responsible for filtering and monitoring, with support from the DSL and ICT support. The review will include checks that filtering and monitoring systems are operating effectively on all internet-connected devices in relevant locations, and a written record of the review will be maintained.

Mobile Devices

Each school will ensure that pupils do not have access to mobile phones throughout the school day, including during lessons, the time between lessons, breaktimes and lunchtime, except where an exemption applies. The school's approach to mobile phones and smart technology will be shared with parents and carers and will take account of the safeguarding risks associated with pupils having unlimited and unrestricted access to the internet via mobile networks.

Wearable AI Devices and Recording Equipment

The school recognises that advances in technology, including wearable artificial intelligence (AI) devices, smart glasses, body-worn cameras, smart watches and other devices capable of recording, transmitting or analysing audio, images or video, may present safeguarding, privacy and data protection risks.

Staff, volunteers, contractors, visitors and pupils must not use personal wearable devices or equipment capable of recording audio, images or video whilst undertaking school activities or on school premises, unless expressly authorised by the Headteacher and where there is a clear educational, operational or accessibility need. Any authorised use must comply with the school's safeguarding, staff code of conduct, online safety, data protection and acceptable use policies.

The covert recording, live-streaming, photographing or monitoring of children, staff or visitors is strictly prohibited and may be treated as a safeguarding concern, disciplinary matter or, where appropriate, a criminal offence. Particular care must be taken with devices incorporating artificial intelligence functionality, including those capable of facial recognition, object identification, transcription, translation, data collection or real-time analysis.

Where concerns arise regarding the use of wearable technology, the Designated Safeguarding Lead (DSL) will assess any actual or potential risk to children, consider whether a safeguarding referral is required, and work with relevant agencies where necessary. The school reserves the right to require the removal, secure storage or discontinuation of any device where its use may compromise the safety, welfare, dignity, privacy or data protection rights of members of the school community.

The school will ensure that staff are aware of emerging technologies and the safeguarding risks associated with AI-enabled and recording devices and will take appropriate action to minimise risks to children, including through staff training, risk assessment and the implementation of clear expectations regarding the use of technology within the school environment.

Photography and images

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

14. Making or sharing of nudes or semi-nudes

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nudes and semi-nudes as a safeguarding concern, including where these images are generated by AI.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that making or sharing imagery depicting nudes or semi-nudes of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. The DSL will work to support the affected pupils and inform them of the reporting routes to remove a nude or semi-nude that has been shared online or to prevent an image from being shared online.

15. Appropriate physical contact with pupils

The school will not operate a 'no contact' policy. The school will also not agree to any request from parents or staff that would prevent the use of reasonable force and other restrictive interventions where these may be necessary and lawful. A 'no contact' approach could leave staff unable to intervene appropriately to safeguard pupils and others.

Physical intervention and reasonable force may be used in limited circumstances and will be managed in line with the Trust Restrictive Intervention Policy.

The school will adopt sensible policies and practices which will allow and support staff to make appropriate physical contact with pupils where this is necessary, proportionate and in the best interests of the child. There will be circumstances in which physical contact will be appropriate and will not give rise to concerns about the use of reasonable force or restrictive interventions.

Examples of circumstances where physical contact will generally be appropriate include:

- Providing first aid.
- Guiding or escorting pupils, e.g. holding the hand of a younger pupil when moving around the school or on a school trip, supporting a pupil to move to a space they have chosen to access in order to self-regulate, or assisting pupils to move safely.
- Comforting a distressed pupil.
- Congratulating or praising a pupil, e.g. a handshake or a brief pat on the back.
- Demonstrating how to use a musical instrument.
- Demonstrating exercises or techniques during PE lessons or sports coaching.

When deciding whether physical contact will be appropriate in a particular situation, staff will use their professional judgement and will have regard to:

- This policy and any other relevant policy.
- The context and circumstances, including whether other adults are present.
- The individual pupil's age and level of understanding
- Any other relevant factors, including, but not limited to:
  - Whether the pupil has SEND or other vulnerabilities.
  - Whether alternative strategies that do not involve physical contact could be used.

16. Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

17. Pupils potentially at greater risk or harm

The school recognises that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse, neglect and exploitation. The school will ensure that safeguarding concerns involving these pupils are responded to appropriately, taking account of their individual needs and circumstances.

Pupils who need social workers

Pupils may need social workers due to abuse, neglect, exploitation or complex family circumstances. Their experiences of adversity and trauma may leave them vulnerable to further harm and educational disadvantage, including barriers to attendance, learning, behaviour and mental health.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Children who are absent from education
The school recognises that pupils who are absent from education for prolonged periods and/or on repeated occasions may be at increased risk of abuse, neglect, CCE and CSE, including county lines.

Each school will respond to concerns relating to attendance in accordance with its Attendance policy and CME SOP and will work with CSCS and other agencies where absence gives rise to safeguarding concerns.

Home-educated children
Whilst many home educated children receive suitable education, The school recognises that elective home education (EHE) can mean that children are less visible to the services needed to safeguard and support them.

In line with the School Attendance (Pupil Registration) (England) Regulations 2024, the school will inform the LA of all deletions from the admissions register when a pupil is removed from the school roll.

Where a parent has expressed their intention to remove a pupil from school for EHE the Trust EHE SOP will be followed. The school, in collaboration with the LA and other key professionals, will endeavour to coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Pupils requiring mental health support

The school recognises that mental health problems can, in some cases, develop into safeguarding concerns. This may include self-harm, signs of an eating disorder, suicidal ideation or suicide, or indicate that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Only appropriately trained professionals will make a diagnosis of a mental health condition; however, all staff will play an important role in promoting positive mental wellbeing, identifying pupils who may require support, ensuring there is early intervention and that concerns are escalated and referrals made to external mental health and wellbeing services where appropriate.

Where support is required, the DSL or deputy will consider whether parents should be informed where doing so will not place the pupil at additional risk. Where safeguarding concerns are linked to a pupil's mental health or emotional wellbeing, the DSL or deputy will liaise with the school's senior mental health lead and/or mental health and wellbeing services to ensure the pupil receives coordinated support.

The school will maintain a whole-school approach to promoting positive mental health and wellbeing and will make use of appropriate internal and external support services where required.

LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

Trust and school leaders will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers. Each school will appoint a Designated Teacher for Looked After Children who holds Qualified Teacher Status.

Further details of safeguarding procedures for LAC and PLAC are outlined in the Trust's Looked After Children Policy.

Young carers

The school recognises that caring responsibilities may have a significant impact on a pupil's attendance, attainment, behaviour and wellbeing.

The school will seek to identify young carers at the earliest opportunity and will work with pupils, families and external agencies to ensure that appropriate support is provided.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware that:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability.
- Pupils with SEND can be disproportionally impacted by issues such as peer isolation, bullying, and prejudice-based bullying without outwardly showing any signs.
- Communication barriers may make it more difficult for pupils to recognise, disclose or report abuse.
- Pupils with SEND may not always recognise that what is happening to them is abuse.
- Pupils requiring intimate care or who are more isolated from others may be at increased risk.
- Pupils may be more dependent on adults for care.
- Pupils may have difficulty understanding the difference between fact and fiction online or understanding the consequences of their online behaviour.

When responding to safeguarding concerns involving pupils with SEND, the DSL will liaise with the SENDCO and, where appropriate, parents and external agencies to ensure that the pupil receives appropriate support.

The school will also consider whether additional pastoral support or communication support is required.

Pupils with medical conditions

The school recognises that pupils with medical conditions or allergies may require additional safeguarding consideration.

A safeguarding referral will not be made solely because of an incident relating to the management of a pupil's medical condition; however, where concerns indicate that a pupil may be at increased risk of neglect, abuse or exploitation, for example where essential medical information or medication is repeatedly not provided, the school will respond in accordance with its safeguarding procedures.

Pupils will be supported in accordance with the Trust Supporting Pupils With Medical Conditions Policy.

Pupils who are lesbian, gay or bisexual

The fact that a pupil is lesbian, gay or bisexual is not, in itself, a risk factor for harm; however, the school recognises that these pupils, or those perceived to be lesbian, gay or bisexual, may be more vulnerable to discriminatory bullying.

The school will take appropriate steps to prevent and respond to bullying and ensure that all pupils feel safe, respected and supported.

Pupils who are questioning their gender

The school recognises that some pupils may question their gender and that they may have additional vulnerabilities, including mental health or psychosocial needs.

The school will take time to understand the individual circumstances of pupils who are questioning their gender and will respond on a case-by-case basis, acting in the best interests of the pupil and taking account of the safety and wellbeing of all pupils.

The school will not initiate action relating to social transition. Where a request for support is received from a pupil or their parent, the school will respond in accordance with the latest DfE guidance, taking a cautious approach, involving the DSL and, except where doing so would place the pupil at risk of significant harm, working in partnership with parents.

Where a pupil discloses that they are questioning their gender or requests support in relation to social transition, staff will listen carefully and respond sensitively. Staff will not promise confidentiality and will explain that any information shared may need to be discussed with the DSL in order to safeguard and promote the pupil's welfare.

The school will maintain a culture in which bullying is not tolerated and will ensure that pupils who are questioning their gender receive appropriate safeguarding support and are able to raise concerns with trusted members of staff.

The DSL will ensure that appropriate records are maintained of any requests relating to social transition, the factors considered, decisions made, and the reasons for those decisions. Records will be kept securely in accordance with the Data Protection Policy.

18. Use of the school premises for non-school activities

Where the school hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe in line with the school's Lettings policy.

Where the school provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. Each school will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. Each school will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs
External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements. Schools will confirm and evidence that an enhanced DBS check with barred list information has been undertaken for all staff members and volunteers engaged in regulated activity.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

19. Alternative Provision

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will follow the Trust SOP for alternative provision, ensuring that written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs.

Those responsible for the commissioning of AP will be aware that pupils in AP will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

The school will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment. This will include written confirmation that the alternative provider will inform the school of any arrangements that may put the pupil at risk.

The school will continue to carry out safeguarding checks and conduct its own due diligence to ensure that the AP is appropriate for meeting each pupil's individual needs.

The school will ensure that the location of pupils placed at AP is always known and will maintain records of the address of the alternative provider and any subcontracted provision or satellite sites the pupil may attend.

AP placement reviews using the Trust visit monitoring form will take place at least half termly to ensure that pupils are regularly attending and the placement continues to be safe and meets their needs.

If a pupil is not attending school full time a part-time timetable will be in place in accordance with the school's attendance policy and the Trust part-time timetable SOP.

Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

20. Safeguarding in the curriculum

The core curriculum

The Core Curriculum of each school should address the following through its PSHE/SMSC/wider curriculum offer:

- Bullying/Cyberbullying/Peer-to-peer abuse
- Online safety
- Diversity issues
- Forced marriage, Honour Based Violence, FGM
- Domestic violence, drug and alcohol abuse
- Extremism, radicalisation
- Sexual exploitation – grooming, sexting
- Sexual harassment / sexual violence
- Promoting safe and respectful relationships (primary and secondary)
- Health Education
- Child Criminal Exploitation and gang violence
- Other local contextual safeguarding issues

Enrichment activities

Where the Trust or school provides services or activities under the supervision or management of Trust/school staff, then the Trust's and school's Safeguarding and Child Protection policies apply.

Where services or activities are provided separately by another body, this is not necessarily the case.
The school must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place including safer recruitment policies that ensure an enhanced DBS check with barred list information will be undertaken for all staff members and volunteers engaged in regulated activity (inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate and necessary.

Each school should ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the provision/agreement.

Work experience

When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place.

The school will not allow someone on the barred list to engage in regulated activity with a pupil on a work experience placement.

Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

21. Homestay and exchange visits

School-arranged homestays in UK

Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

The school will liaise with partner schools to discuss and agree the arrangements in place for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK.

The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs, or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement, and the school is not the regulated activity provider.

Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

22. Non-collection of children

If a child is not collected at the end of the session/day:

- A check will be made for information about changes to the normal collection routines
- Reasonable attempts will be made to contact parents, carers or others with parental responsibility at home or at work or other adults authorised to collect the child or vulnerable young person from the setting.
- The child or vulnerable young person will not leave the premises with anyone other than parents, carers, others with parental responsibility or another authorised person.
- If no one can be contacted to collect the child or vulnerable young person after one hour, the Local Authority Safeguarding Hub or Police will be contacted.
- The child or vulnerable young person will stay at the setting in the care of two staff members until safely collected either by the parent, carer, a person with parental responsibility, another authorised person, social worker or police officer.
- Staff should never take the child or vulnerable young person home with them or provide a lift to them in their own car, etc.

A full written report of the incident and outcome must be recorded on CPOMs.

23. Safeguarding separation

In exceptional circumstances, the school may determine that a safeguarding separation is necessary to protect the welfare of one or more pupils. Safeguarding separation is distinct from a suspension or permanent exclusion and may be used where the school considers that a pupil cannot safely remain on the school site while safeguarding concerns are assessed, investigated or managed.

Examples may include situations involving allegations of harmful behaviour, peer-on-peer abuse, sexual violence or sexual harassment, or other safeguarding concerns where continued contact between pupils may present a risk.

Decisions regarding safeguarding separation will be made by the Headteacher in consultation with the Designated Safeguarding Lead and, where appropriate, external agencies. The welfare of all children involved will be the paramount consideration.

Where safeguarding separation is implemented, the school will follow the OSD SOP ensure that suitable educational provision is arranged and that regular reviews are undertaken to determine whether the arrangement remains necessary and proportionate. Parents/carers will be informed of the reasons for the decision, the educational arrangements that will be put in place, and the review process.

The use of safeguarding separation will not be used as a disciplinary sanction and does not replace the school's behaviour policy and the Trust suspension and exclusion policy. Any decision to use safeguarding separation will be lawful, reasonable, proportionate and based on an individual risk assessment.

24. Reporting and responding to concerns about pupils

The Trust will approve and continuously monitor the procedures within each school for reporting concerns about pupils' welfare. Monitoring visits will be conducted by the Trust Safeguarding and Inclusion Manager and the lead safeguarding governor at least termly and will assess whether each school:

- Has clear procedures for staff to report concerns to their DSL.
- Has clear procedures for their DSL to make referrals to their LA.
- Has trained its staff members to understand their responsibilities in these procedures.
- Has ensured all staff are aware of their obligations in relation to confidentiality and information sharing.

Identifying and reporting concerns

Staff members will maintain an attitude of 'it could happen here' where safeguarding is concerned. Staff will always act in the best interests of a pupil when they are concerned about their welfare.

Staff will be aware that students may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a student.

Staff will be aware that data protection laws do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If there is any doubt about sharing information, staff will speak to the DSL or deputy. Fears about sharing information will not stand in the way of the need to safeguard and promote the welfare of children.

If you have a concern that a pupil has been or is likely to be harmed

If a child tells you something that indicates they have been or are likely to be harmed or if you have observed something that suggests this:

- Listen to and believe them. All disclosures and reports must be taken seriously.
- Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Record your conversation as soon as possible using the child's own words. Ensure your recording is clear, factual, non-judgemental and includes all details of what was shared with you or what you observed and record this on CPOMS.
- If you believe a child has been or is at risk of being harmed this must be reported in person to the DSL/DDSL immediately. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (staff must personally report to police where they discover that

an act of FGM has been carried out), and tell the DSL as soon as possible that you have done so.

- If the DSL is not available, this should not delay appropriate action being taken. Speak to a deputy DSL or member of the senior leadership team and/or take advice from the local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL (or deputy) as soon as practically possible.

If you have welfare concerns about a child

If you have welfare concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger):

- Where possible, speak to the DSL first to agree on a course of action.
- Write up your concern as soon as possible in the child's own words. Ensure your recording is clear, factual, non judgemental and includes all details of what was shared with you or what you observed and record this on CPOMS
- Welfare concerns will be responded to, appropriate actions put in place and recorded on CPOMS by the DSL/DDSL or pastoral leader as appropriate.

Determining the appropriate response

Following a report, the DSL or deputy DSL will consider the information provided, the pupil's level of need and any known history before determining the most appropriate course of action.

This may include:

- Managing any support for the pupil internally via the school's pastoral support processes, including considering where doing so does not place the pupil at additional risk, and whether the DSL or deputy should inform parents to further support the pupil's wellbeing.
- Undertaking a family help assessment.
- Making a referral to statutory services, e.g. as the pupil could be in need, is in need or is suffering, or likely to suffer harm.

Where a community-based early help or family help assessment is undertaken, the DSL will normally coordinate the school's involvement with partner agencies. Staff will contribute to assessments, planning and reviews as required. The school will keep all cases under regular review and will request further intervention or make a referral to CSCS where the pupil's circumstances do not improve or where risks increase.

Staff members will be advised to read the DfE's guidance on information sharing to support them in the event that they need to make a decision about sharing information.

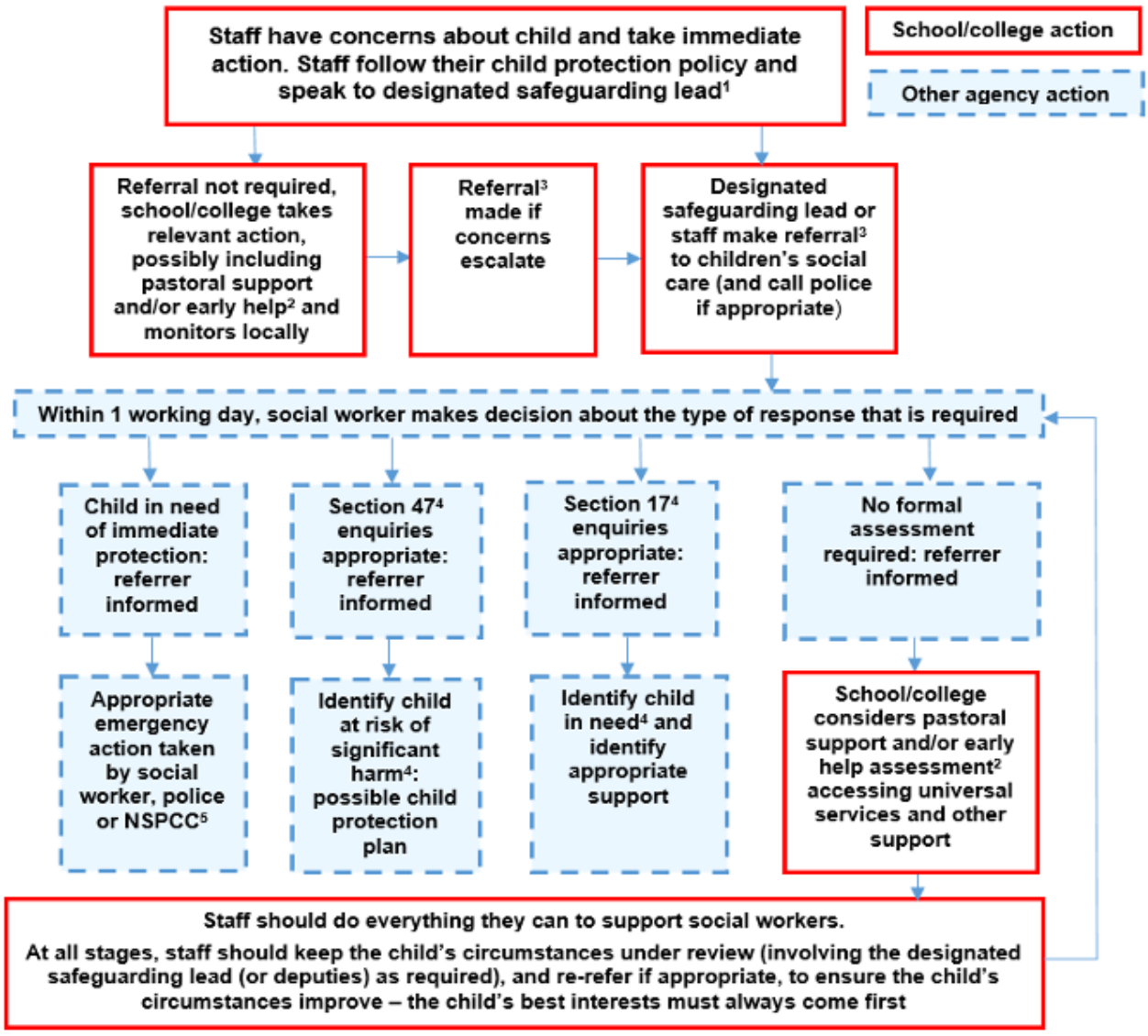
Referrals and multi-agency working

Where a pupil is suffering, or is likely to suffer, significant harm, or is in immediate danger, a referral will be made immediately to CSCS and/or the police, as appropriate. Referrals will follow the local referral process for the LA the child resides in.

Where a criminal offence is suspected, including incidents of sexual violence, the police will be notified without delay.

The reporting and referral process outlined in the DfE's flowchart setting out the actions taken where there are concerns about a pupil will be followed accordingly.

Figure 1: Flowchart setting out the actions taken where there are concerns about a child



The DSL will be familiar with local safeguarding partnership referral arrangements and will provide advice and support to staff where required. Information will be shared with external agencies in accordance with data protection legislation and the school's confidentiality procedures.

Where the school makes a referral, the DSL will expect to receive confirmation of the LA social worker's decision within one working day. Where this information is not forthcoming, the DSL will follow this up with the LA social care team.

If the LA social worker decides to carry out a statutory assessment, the DSL or deputy will do everything they can to support this process, with assistance from relevant staff members as required.

If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.
The DSL will maintain effective liaison with CSCS, the police and other relevant agencies to support the pupil's welfare and ensure that the school does not compromise any ongoing investigations.

The school will not wait for the outcome of a statutory or criminal investigation before taking appropriate action to safeguard and support the pupil. Where statutory intervention is not required, the school will continue to consider appropriate support through community-based early help, family help, pastoral support or other suitable interventions.

Supporting pupils and recording concerns

Where safeguarding concerns arise, the school will ensure that the pupil's wishes and feelings are taken into account and that pupils are given opportunities to express their views. Staff will respond calmly and supportively, ensuring pupils feel listened to, taken seriously and supported.

Discussions with parents will take place where appropriate and where doing so will not place the pupil or others at increased risk of harm. The school will work with parents and partner agencies, where appropriate, to support the pupil's safety and wellbeing.

All safeguarding concerns, discussions, decisions and the reasons for those decisions will be recorded promptly by the DSL or deputy DSL and stored securely on CPOMS.

25. Concerns about school safeguarding practises

Complaints
Any external complaints about safeguarding in the school should follow the Trust's Complaints Procedure. Any internal complaints about safeguarding in the school should be raised in the first instance with the headteacher.

Whistleblowing
Whistleblowing is the term used when an employee or worker passes on information concerning alleged wrongdoing, such as unlawful conduct, financial malpractice, causing a danger to staff, the public or the environment, contravening the Trust or School policies or the Trust Code of Conduct or deliberate concealment of any of these alleged activities. The wrongdoing disclosed must be in the 'public interest', and personal grievances or complaints would not normally be covered by whistleblowing law.

Concerns about any of the Trust/school's practices when safeguarding children or vulnerable adults should be raised initially with the CEO/Headteacher or via submission of a Low Level Concern Form. Where individuals do not feel comfortable doing this, they should raise their concerns with one of the specified people in the Trust Whistleblowing Policy.

Concerns about School Safeguarding Practices
Any concerns regarding the safeguarding practices at the Trust/school will be raised with the CEO/Headteacher, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the CEO/Headteacher, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

The Trust will ensure that any child protection incidents at any of its schools will be followed by a review of the safeguarding procedures within that school and a prompt report to the trust board and governing board. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the school's procedures.

If any concerns about safeguarding practice are raised by the Trust, LADO of Ofsted the following actions will be taken:

- The DSL and Headteacher will carry out an investigation as a priority and comply with any directions and deadlines given by the Trust. If deemed necessary, Trust staff may be involved in the investigation
- The Headteacher reports to the Trust, LADO or Ofsted on the findings of the investigation and sets out any action to be taken.
- The school endeavours to comply as soon as possible with any recommendations from the Trust, LADO or Ofsted.

26. Safeguarding concerns and allegations of abuse against staff

Anyone who has concerns about a member of staff (including a supply teacher or volunteer), or if an allegation is made about a member of staff (including a supply teacher or volunteer) posing a **risk of harm** to children, should speak to the Headteacher immediately.

Staff will have met the **harm threshold** if they have:

- Behaved in a way that has harmed a child, or may have harmed a child (or young person).
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved/may have behaved in a way that indicates they may not be suitable to work with children.
- The Headteacher/Chief Executive Officer will then follow the procedures and process checklist set out in the Local Authority Children Safeguarding Partnership.
- Allegations should be responded to quickly, fairly and consistently, protecting the child or young person whilst supporting the person subject to the allegation.
- The LADO and case manager should systematically record the allegations, detailing all decisions and actions.
- Procedures for dealing with allegations will be applied with common sense and judgement.
- Staff should refer to the Allegations & concerns about staff and volunteers process checklist, which can be found in the Local Authority policy.

- **If the concerns/allegations are about the Headteacher, individuals must report this directly to the Chief Executive Officer.**
- **If the concerns/allegations are about a Governor or a Trustee, individuals must report this directly to the Chief Executive Officer.**
- **If the concerns/allegations are about the Chief Executive Officer, individuals must report this directly to the Chair of the Trust Board**

Concerns that do not meet the 'harm threshold'

Low-level concerns about adult behaviour are those that do not meet the 'harm threshold' above but are not insignificant. They often cause a sense of unease or a 'nagging doubt'. e.g., behaviour that is:

- Inconsistent with staff code of conduct, including outside work.
- Overly friendly with children.
- Having favourites.
- Taking photographs of children/young people on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating students.

Such behaviour can appear inadvertent, thoughtless, or inappropriate, or intended to enable abuse. Concerns may arise from a:

- Suspicion or complaint.
- Disclosure made by any child, parent, or other adult.
- As a result of vetting checks.

The school will ensure the staff codes of conduct, behaviour policy, and safeguarding policies and procedures are implemented effectively, and that appropriate action is taken to deal with any concern.

Sharing Concerns:

- If staff find themselves in a situation that could be misinterpreted, or they have behaved in a way that falls below professional standards, they should self-refer.
- If there is a concern about a member of staff who may meet the harm threshold, the Trust procedure for Managing Allegations Against Staff should be followed and reported to the Headteacher (or Chief Executive Officer if the concerns relate to the Headteacher or Chair of the Trust Board if the concerns relate to the Chief Executive Officer). If the concern does not meet the harm threshold, the Trust's Low-Level Concerns policy should be followed, and concerns reported to the Headteacher (or the Chief Executive Officer if the concern relates to the Headteacher).
- The Trust Whistleblowing Policy may be referred to where there are concerns about malpractice and disclosure under the Public Interest Disclosure Act 1998.

Recording Concerns:

The Headteacher should record all low-level concerns. Records should include:

- Details of the concern.
- How the concern arose.
- The context in which the concern arose.
- Action taken.
- Records should be reviewed so that patterns of concerning behaviour can be recognised and appropriate action taken.

Please refer to the Trust's Low Level Concerns Policy and the Trust's Managing Allegations Against Staff Policy for more information.

27. Communication and confidentiality

When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within the school and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving the school either the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

Where a child leaves the school, the DSL will ensure that the child's CPOMS file, including any child protection concerns, welfare information and records of actions taken, is transferred securely and separately from the main pupil file to the DSL or safeguarding lead at the receiving setting as soon as possible.
The DSL will seek confirmation of receipt and retain a record of the transfer in line with data protection requirements. Where appropriate, the DSL will discuss ongoing safeguarding concerns with the receiving setting to support a smooth transition and ensure continuity of support and protection for the child. If a destination school or setting is not known, the DSL will retain the safeguarding file securely until the child's next placement can be confirmed.

Where a pupil attends an alternative provision, temporary off-site direction, managed move placement or any other placement whilst remaining on the school roll, the DSL will ensure that relevant safeguarding information is shared promptly, proportionately and securely with the designated safeguarding lead or appropriate safeguarding contact within the provision. The DSL will maintain regular communication with the placement, share updates relating to safeguarding and welfare concerns, and ensure that responsibilities for monitoring, reporting and responding to concerns are clearly understood by all parties to safeguard the pupil effectively throughout the placement. If the placement a child is accessing has CPOMS Engage then a share contract will be set up as soon as the child starts their placement.

28. Safer recruitment

The school's full policy and procedures for safer recruitment are outlined in the Trust's Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members and volunteers engaged in regulated activity.

The school will determine whether a role constitutes regulated activity in accordance with current legislation and DfE guidance, including the DBS Workforce Guides. This will include staff, volunteers and third-party personnel engaged in regulated activity. Where a role constitutes regulated activity, an enhanced DBS certificate with barred list information will be obtained before the individual begins work.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The school will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK. The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

The school will also ensure that trainee teachers and other individuals undertaking placements are subject to the appropriate safeguarding and recruitment checks in accordance with KCSIE and the Safer Recruitment Policy.

Staff suitability

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

Ongoing suitability
Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to pupils or placing pupils at risk.

Referral to the DBS
The school will refer an individual to the DBS where the legal duty to do so is met, including where they have harmed, or pose a risk of harm to, a pupil and have been removed from regulated activity, or would have been removed had they not resigned, retired or otherwise left their role.

29. Single Central Record (SCR)

The school maintains an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school. The Trust's SCR template must be used by all settings.

All members of the proprietor body are also recorded on the SCR.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery) and the date that confirmation was received.

For volunteers engaged in regulated activity, the school will record on the SCR the same pre-appointment checks required for individuals undertaking regulated activity, including an enhanced

DBS certificate with children's barred list information. Where checks are undertaken for volunteers who are not engaged in regulated activity, these will also be recorded on the SCR. Where a risk assessment is undertaken to determine whether a volunteer who is not engaged in regulated activity should be subject to an enhanced DBS check, this will also be recorded. Written confirmation that supply agencies have completed all relevant checks will also be included.

30. Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated on a regular basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE).
- The Behaviour Policy.
- The Children Missing from Education Policy, including the safeguarding response to children who are absent from education.
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.
- Contextual safeguarding risks.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE, CSE, modern slavery and trafficking, including where a referral to National Referral Mechanism may be appropriate.
- Updated online safety training.
- Prevent
- Allergies and supporting children with medical conditions

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSL and deputy DSLs will undergo child protection and safeguarding training and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up to date with any developments relevant to their role. This will include training to understand:

- Assessment process for providing community-based early help, family help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.

- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

31. Monitoring and Evaluation

This policy is reviewed at least annually by the DSL and the headteacher. This policy will be updated as needed to ensure it is up to date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is September 2027

Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the school and a prompt report to the Trust executive team. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the school's procedures.

32. Equality Impact Assessment

The Trust will carry out an Equality Impact Assessment to ensure that policies, procedures and practices cater for individuals who share protected characteristics in relation to the Equality Act 2010. The purpose of these assessments is to ensure that policies, procedures and practices within the organisation are fair to all. If unfairness is highlighted, the assessment will also seek to show how this can be changed and, where it can't be changed, how it can be improved.

The Trust will monitor the impact of the policy to assess whether there is evidence of a detrimental impact on anyone with a protected characteristic as a result of the application of this policy. The assessment will include consideration of adaptations or changes which can be made to address any issues identified.