Trust Safeguarding Policy

Review Period	Annually
Person Responsible for Policy	Chief Executive Officer
Governing Committee	Trust Board
Most recent date of Directors' approval	September 2026
Next scheduled date for review	September 2027

Document Control

Changes History

Issue No	Date	Amended by	Summary of Changes
1	1st September 2024	Sarah Williams	Updated to reflect Keeping Children Safe KCSIE 2024
2	1st September 2025	Sarah Williams	Updated to reflect Keeping Children Safe in Education (KCSIE) 2025 Section 1 - Staff induction now includes: child protection policy, behaviour policy, staff code of conduct (including low-level concerns, allegations and whistleblowing). Section 7.9 and Appendix 4 – Expansion of contextual safeguarding Section 11 – Updated the definition of online harms to include changes in KCSIE 2025 Section 12 – Added a paragraph about drones Section 15 – Updated safeguarding training arrangements for governors Appendix 2 – Clarified that the original DBS certificates of agency supply staff must be seen, and that agency supply staff must be added to the SCR even if they are only in school for a day Appendix 2 – Clearer language in relation to written confirmation required from AP providers in line with KCSIE 2025 Appendix 3 – Clarified the procedure around LADO referrals Appendix 4 – Addition of Child abuse linked to faith or belief (CALFB) and addition of cultural considerations in safeguarding practice Appendix 4 – Addition of the Manosphere as a specific safeguarding issue Appendix 4 – Clarified what staff should do if they become aware of a nude or semi-nude image or video of a child Appendix 3 – LADO contact information to include Sefton
3	1st September 2026	Sarah Williams	**Updated to reflect Keeping Children Safe in Education 2026, including:** • requirement for all staff to read Part one; • revised Annex A and Annex B references; • Family Help and community-based Early Help; • prejudice-based harm; • revised child-on-child abuse and harmful behaviour procedures; • serious violence and weapons; • safeguarding children with SEND and medical conditions; • mental health and suicide risk; • generative AI and AI-generated content; • mobile-phone expectations; • filtering and monitoring; • information security and cyber security;

			• information sharing and child protection file transfers; • robust DSL cover; • Alternative Provision commissioning and monitoring; • temporary accommodation notifications; • regulated activity, volunteers and work experience; • agency and third-party staff; • Operation Encompass; • school premises, sport and overnight accommodation; and • arrangements for supporting children who are questioning their gender.

Authorisation (Responsible Owner)

Name	Role	Approval Date
Sarah Williams	Trust Safeguarding Lead	1st September 2026

Approval (Accountable Owner)

Name	Role	Approval Date
Heather Duggan	CEO	September 2026
Paul Cronin	Named Trustee for Safeguarding	September 2026

Distribution List – Once authorised (Informed)

Role	Name
Governance Professional	Elizabeth Heaton
Headteachers	Gary Lloyd, Adam Robinson, Teresa Bleasdale, Marie Adams, Roy Bellmon, Lynne Gannon, Sam Birchall, Paul Ackers and Debbie Pringle
DSLs	Kate McDowell, Mo Ungi, Emma Porter, Katherine Grange, Alex Mowatt, Louisa Martin, Mark Charles, Jess Haig, Rachel Brennan, Dan Silverstone and Eve Mawdsley
For uploading to Trust website	Suzanne Devany

Review Period (at least annually or whenever statutory guidance changes)

Date Document Reviewed	By Whom
1st September 2026	Sarah Williams (Trust Safeguarding Lead)

Contents

Item	Focus	Page
1	Safeguarding statement and aims	3
2	Legislation and statutory guidance	5
3	Definitions	5
4	Equality statement	6
5	Safeguarding requirements relating to school premises	7
6	Roles and responsibilities	8
7	Confidentiality	12
8	Recognising abuse and taking action	12
9	Notifying parents	22
10	Children who may require additional support	22
11	Online safety, generative AI and AI-generated content	25
12	Information sharing and data protection	27
13	Complaints and concerns about safeguarding practices	28
14	Safeguarding and Child Protection Training	29
15	Monitoring arrangements	32
16	Links with other policies	32
Appendix 1:	types of abuse	33
Appendix 2:	safer recruitment and DBS checks – policy and procedures	34
Appendix 3:	Safeguarding concerns and allegations made about staff, including supply staff, volunteers and contractors	37
Appendix 4	specific safeguarding issues	45
Annex B:	Role of the Designated Safeguarding Lead	58

1. Safeguarding statement and aims

The trust believes in supporting all aspects of children and young people's development and learning, and keeping children safe. This is best achieved when parents/carers, children and schools work together. Parents/carers are key to children and young people becoming and remaining resilient. We understand that emotional and social aspects of learning create a foundation for all academic learning. If a child has not been supported to understand, express and resolve their feelings, they may not have the ability to share with other children, resolve the small conflicts that arise in day-to-day classroom life, or concentrate on learning. Their frustrations may cause a range of antisocial, disruptive, overly compliant or withdrawn behaviours. All staff who work at the trust will ensure that:

- Children and young people are listened to, valued and respected
- Staff are aware of indicators of abuse and know how to share their concerns appropriately
- All paid and unpaid staff are subject to rigorous recruitment procedures
- All paid and unpaid staff are given appropriate support and training

Education staff play a crucial role in helping to identify welfare concerns, and indicators of possible abuse or neglect, at an early stage. The trust is committed to referring those concerns via the Designated Safeguarding Lead (DSL) to the appropriate local authority children's social care, contributing to the assessment of a child's needs and, where appropriate, to ongoing action to meet those needs. In order to ensure children are adequately protected the trust will ensure that:

- All DSLs, Deputy/Alternate DSLs, named safeguarding governors and named governors for children in care attend specialised training appropriate for their positions, which will be updated at least annually.

- All staff, teaching and support, paid and volunteers, will receive up to date safeguarding training . A log of staff safeguarding training is kept by the DSL. All staff, including those who do not work directly with children, must read and understand at least Part one of *Keeping Children Safe in Education 2026*.
- As part of their induction, all new staff will receive a copy of this policy and child protection policy, behaviour policy, staff code of conduct (including low-level concerns, allegations and whistleblowing), DSL identity and safeguarding response to children missing from education, and school induction pack. In addition, all staff must read and understand at least Part one of Keeping Children Safe in Education 2026. School leaders, the designated safeguarding lead and deputies, and staff who work directly with children should also read Annex A which contains additional information about specific forms of abuse, exploitation and safeguarding issues.
- All staff must be provided with Part one at induction. The Trust and its academies will put appropriate arrangements in place to support staff to understand and discharge their safeguarding roles and responsibilities. This may include discussion, knowledge checks, scenario-based training, briefings and opportunities for staff to ask questions.
- As part of induction, staff will be informed about:
    - the Trust safeguarding policy and the academy's child protection procedures;
    - the academy's behaviour policy, including measures to prevent bullying, cyberbullying and prejudice-based and discriminatory bullying;
    - the staff code of conduct, including professional boundaries, the acceptable use of technology, staff-pupil communication, low-level concerns, allegations and whistleblowing;
    - the safeguarding response to children who are absent from education, particularly repeatedly or for prolonged periods;
    - the identity and role of the designated safeguarding lead and deputies;
    - the academy's arrangements for reporting and recording concerns;
    - the expectations, roles and responsibilities relating to online safety, filtering and monitoring; and
    - how to raise concerns about safeguarding practice within the academy or Trust.
- Staff will confirm that they have received, read and understood the relevant policies and statutory guidance. Safeguarding and child protection training, including online safety, must be completed at induction and regularly updated. Staff will also receive safeguarding updates as required and at least annually.
- Whenever this policy is reviewed and updated the trust will ensure that all staff receive a copy; each school will insist that staff sign a register to confirm that they have read and understood the current version.
- The DSL provides staff with regular updates, which may be via email as well as during staff meetings, INSET days and through safeguarding displays. In addition, all staff must complete safeguarding and child protection training which includes online safety, filtering and monitoring responsibilities, and prevent training updated at induction and refreshed at least annually. Copies of Prevent training certificates are kept by the DSL.
- All members of staff will be advised to ensure that their behaviour or actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This is also highlighted in the staff code of conduct, this policy is also applicable to others in a position of trust working within school.
- All children, young people and their families have access to their school's child protection procedures via the school's website
- The trust safeguarding policy is reviewed on an annual basis by the trust, in consultation with headteachers. Schools will also review their individual school's child protection procedures on an annual basis.
- Where school premises are used for non-school activities, safeguarding requirements are included in lease/hire agreements, as a condition of use/occupation of the premises, and that failure to comply will lead to termination of the agreement

The trust aims to ensure that:

- Our schools take a whole school approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development . Ultimately, all systems, processes and policies should operate with the best interests of the child at heart
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding

- Staff are properly trained in recognising and reporting safeguarding issues
- Where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide
- Well promoted, easily understood and easily accessible systems are in place for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback
- Pupils are taught about safeguarding, including online safety. This may include covering relevant issues for schools through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) which became compulsory from September 2020. The following resources may help:
- The Department for Education's non-statutory guidance: teaching online safety in schools
- Annex D of the Department for Education's statutory guidance, KCSIE includes additional information to support schools and parents/carers to keep children safe online.
- UK Council for Internet Safety (UKCIS) guidance: Education for a connected world
- UKCIS guidance: sharing nudes and semi-nudes: advice for education settings working with children and young people
- The UKCIS guidance on using external visitors helps schools to ensure the maximum impact of any online safety sessions delivered by external visitors
- National Crime Agency's CEOP education programme: thinkuknow
- Public Health England: Rise Above
- harmful online challenges and online hoaxes- this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.
- London Grid for Learning's undressed provides advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.
- Appropriate filters and monitoring systems are in place

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, keeping children safe in education - September 2026 and working together to safeguard children and the governance handbook and should be read alongside:

- What to do if you're worried a child is being abused: advice for practitioners;
- section 3 of the statutory framework for the Early Years Foundation Stage, where children aged 0 to 5 attend school-based nursery or reception provision;
- the locally agreed multi-agency safeguarding arrangements, criteria for action and protocols for assessment applying to each Trust academy; and
- all other relevant legislation and statutory guidance referred to within this policy.

We comply with this guidance and the procedures set out by our local safeguarding partners. This policy is also based on the following legislation, guidance and advice:

- The Children Act 1989 (and 2004 amendments) which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- multi-agency statutory guidance on female genital mutilation, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention of Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteachers should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our schools to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Childcare Regulations 2018 and Childcare Act 2006, which set out who is disqualified from working with children
- Information Sharing: Advice for practitioners
- what to do if you're worried a child is being abused
- Guidance for Safer Working Practice
- sharing nudes and semi-nudes

The Trust and its academies will have regard to Keeping Children Safe in Education 2026 when carrying out their duties to safeguard and promote the welfare of children. The policy will be reviewed at least annually and updated whenever legislation, statutory guidance, local safeguarding arrangements, emerging safeguarding issues or lessons from safeguarding practice indicate that amendment is required.

For the purposes of this policy, a child is anyone under the age of 18.

This policy also complies with our funding agreement and articles of association.

3. Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.
Children includes everyone under the age of 18.
Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as , in some cases, abusive

behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We also recognise that children may not feel ready or know how to tell someone they are being abused. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. We give special consideration to children who:

- Have special educational needs or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

5. Safeguarding requirements relating to school premises

Trust academies will provide and manage toilet, changing and washing facilities in accordance with the School Premises (England) Regulations 2012, the Education (Independent School Standards) Regulations 2014, the Equality Act 2010 and the safeguarding expectations set out in Keeping Children Safe in Education 2026.

Toilets

Academies must provide separate toilet facilities for boys and girls aged eight and over, except where a toilet is provided in a room that:

- is intended for use by one pupil at a time; and
- can be locked from the inside.

Pupils must not be permitted to use toilet facilities designated for the opposite biological sex. Where a child does not wish to use facilities designated for the child's biological sex, the academy will consider whether an appropriate alternative can be provided, such as a self-contained individual toilet. Alternative arrangements must not compromise the safety, privacy, comfort or dignity of the child or other children.

Where an academy provides mixed-sex toilets in addition to separate facilities, it will assess and manage the associated safeguarding risks. Mixed-sex facilities should consist of individual lockable rooms intended for one pupil at a time and should open directly onto an appropriately supervised public area, such as a corridor.

Changing rooms and showers

Academies must provide suitable changing accommodation and showers for pupils who are aged 11 or over at the start of the school year, having regard to their age, numbers, biological sex and any individual requirements. A pupil aged 11 or over at the start of the school year must not be required or permitted to undress in front of a pupil of the opposite biological sex. Pupils must not access changing rooms or showers designated for the opposite biological sex.

Where a child does not wish to use changing or washing facilities designated for the child's biological sex, the academy will consider whether alternative arrangements can be provided without compromising the availability of single-sex facilities. This may include:

- a fully enclosed individual room that can be locked from the inside; or
- access to appropriate facilities at an alternative time.

Alternative arrangements must not compromise the safety, privacy, comfort or dignity of any child.
Decisions about alternative arrangements must:

- be based on the individual circumstances;
- take account of safeguarding, equality and human-rights duties;
- be clearly recorded;
- be communicated only to those who need to know; and
- be reviewed regularly.

Sport and physical education

Academies will organise sport and physical education in accordance with safeguarding requirements, the Equality Act 2010 and relevant guidance from national governing bodies for individual sports.
Some sports may be organised on a single-sex basis where the physical strength, stamina or physique of the average person of one biological sex would place that person at a disadvantage in competition with a person of the other biological sex.

Where single-sex participation is necessary for safety, the academy will not permit exceptions that would compromise the safety of participating pupils.

Where there are no safety concerns and a child requests an individual arrangement relating to participation, the academy will consider:

- the child's best interests;
- the safety, fairness and welfare of all participating pupils;
- relevant safeguarding and equality duties;
- the nature of the sport or activity;
- guidance from the relevant national governing body; and
- whether an alternative arrangement is available.

Decisions and the reasons for them will be recorded and reviewed where circumstances change.

Overnight and residential accommodation

When arranging residential visits, overnight activities or other accommodation for children, academies will have regard to their safeguarding duties, the Equality Act 2010 and all other relevant statutory requirements.
A child must not be required or permitted to share overnight accommodation with a child of the opposite biological sex.

In allocating sleeping arrangements, including dormitories, tents and shared rooms, the academy will consider:

- the biological sex and age of the children;
- the nature and layout of the accommodation;
- privacy, dignity and appropriate supervision;
- SEND, medical and pastoral needs;
- identified safeguarding risks; and
- the safety and welfare of all children attending.

Where a child does not wish to share accommodation with another child of the same biological sex, the academy will consider whether suitable separate accommodation can be provided. Any alternative must not compromise the safety, privacy, comfort or dignity of that child or any other child.
Decisions about individual arrangements must be recorded and shared only with staff who need the information to safeguard the children involved.

6. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the trust and is consistent with the procedures of the local safeguarding partners where we have schools. Our policy and procedures also apply to extended school and off-site activities. We contribute to multi-agency working in line with statutory guidance Working together to safeguard children. We work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. We allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, statutory assessments.

6.1 The trust

In addition to this policy, the trust will:

- monitor the effectiveness of safeguarding through annual safeguarding support visits in every trust school and have at least one of these externally reviewed each year
- provide a staff and persons in a position of trust code of conduct, which includes reporting of low level concerns, allegations against staff and whistleblowing
- provide a whistleblowing policy
- provide recruitment and selection policy and guidance to ensure safer recruitment
- provide every DSL with an annual safeguarding/child protection update (prior to the autumn term), reflecting changes in statutory requirements and current issues
- keep a log of all referrals made to the local authority designated officer (LADO) by trust schools
- liaise with local authority lead professionals for safeguarding, the local safeguarding partners, Ofsted, the ESFA and other agencies as required

6.2 All staff

All staff will sign to confirm they have read and understood Part one of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education , and review this guidance at least annually. They will also sign to confirm they have read and understood their school's current Child Protection Procedures. All staff will be aware of:

- Our systems which support safeguarding, including the staff and persons in a position of trust code of conduct, their school's child protection procedures and the role of the designated safeguarding lead (DSL)
- The family help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), children missing from education, child criminal exploitation, FGM, radicalisation and child on child abuse

Section 14 and appendix 4 of this policy outline in more detail how staff are supported to do this.

6.3 The designated safeguarding lead (DSL)

All Trust academies will appoint an appropriate senior member of the academy leadership team as the designated safeguarding lead. The designated safeguarding lead will have the appropriate status, authority, skills and experience to carry out the role effectively and will take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. This responsibility will be explicit within the role holder's job description. The full responsibilities of the designated safeguarding lead are set out in Annex B of this policy.

When the DSL is absent, named deputies will act as cover. Their details are in the school's child protection procedures.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Ensure that cover is provided for the role when they are absent from the school
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Cooperate with any requests for information from the local authority, such as training returns or annual safeguarding self-reviews, in compliance with Section 11 of the Children Act 2004
- Ensure that staff, volunteers (including governors), pupils and their parents are aware of the school's child protection procedures
- Ensure that all staff receive appropriate safeguarding/child protection training and maintain training records
- Ensure that pupils' child protection records are transferred securely and separately from the main pupil file whenever pupils transfer to a new school. In addition to the child protection file, consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the designated safeguarding lead and deputy designated safeguarding leads are set out in their job descriptions and in Annex B of this policy.

6.4 The designated teacher for children in care and care leavers

All our schools have a designated teacher whose details are in the school's child protection procedures. They must have appropriate training and the relevant skills and experience to work with local authorities to promote the educational achievement of registered pupils who are looked after. Under section 6 of the Children and Social Work Act 2017, they will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

A previously looked after child remains potentially vulnerable and all staff should have the skills, knowledge and understanding to keep them safe.

6.5 The local academy council

The local academy council will hold the headteacher to account for the implementation of this policy and the implementation of the school's child protection procedures. The local academy council will appoint a named safeguarding governor to monitor the effectiveness of this policy. This is always a different person from the DSL. The relevant trust director of education will act as the 'case manager' if an allegation of abuse is made against the headteacher, where appropriate (see appendix 3) in discharging their duties they will undertake termly safeguarding reviews in their school and their report will be shared with the local academy council and the Trust Trust Safeguarding Lead and Inclusion.

The local academy council are responsible for providing constructive challenge to the headteacher, DSL and named safeguarding governor. Local academy councils should also ensure that all governors receive appropriate safeguarding and child protection training (including online safety) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at school are effective and support the delivery of a robust whole school approach to safeguarding.

6.6 The headteacher

The headteacher is responsible for the implementation of this policy and the implementation of the school's child protection procedures, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of the school's child protection procedures as part of their induction
- Communicating the school's child protection procedures to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff, including supply staff, volunteers and contractors, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person

6.7 Regulated activity and volunteers

A person is engaged in regulated activity with children where the legal conditions for regulated activity are met. This includes a volunteer who teaches, trains, instructs, cares for or supervises children frequently, on more than three days in any 30-day period, or overnight.

Supervision does not remove a volunteer from regulated activity where the statutory activity and frequency conditions are met.

Where a volunteer will engage in regulated activity, the academy must obtain an enhanced Disclosure and Barring Service check, including children's barred-list information, before the volunteer undertakes that activity, subject to the statutory arrangements governing any permitted separate barred-list check.

Existing volunteer roles must be reviewed against the current definition of regulated activity. Where an existing volunteer is brought within regulated activity, the academy must obtain the necessary barred-list and enhanced DBS information.

In provision covered by the Early Years Foundation Stage, a member of staff or volunteer must not begin regulated activity until the academy has received the enhanced DBS certificate, including children's barred-list information.

Where a volunteer role does not constitute regulated activity, the academy will complete and record a written risk assessment to determine what checks and supervision are appropriate. The assessment should consider:

- the nature and frequency of the activity;
- the degree of contact with children;
- what is known about the volunteer;
- whether appropriate referees are available;
- the age and vulnerability of the children;
- the location and degree of supervision; and
- whether another level of DBS check is legally available and appropriate.

An unchecked volunteer must never be left unsupervised or permitted to undertake regulated activity.

6.8 Work experience

When arranging work experience, academies will ensure that the placement provider has appropriate policies and procedures in place to protect children from harm.

A person who teaches, trains, instructs, cares for or supervises a child on work experience frequently, on more than three days in a 30-day period, or overnight may be engaged in regulated activity. A person who is barred from working with children must not be permitted to undertake regulated activity.
Before agreeing a placement, the academy will assess:

- the nature and duration of the placement;
- the age and vulnerability of the child;
- who will supervise the child;
- how frequently supervision will occur;
- whether the activity constitutes regulated activity;
- what safeguarding assurance is required from the provider; and
- how the child will report concerns or seek help.

The academy will ensure the child understands who to contact if an emergency occurs or if anything during the placement causes concern or discomfort.

6.9 Agency and third-party staff

The academy must obtain written notification from the relevant agency or third-party organisation confirming that it has carried out the checks that the academy would otherwise be required to undertake for the individual concerned.

Written confirmation must include assurance that the appropriate enhanced DBS certificate has been obtained and, where the role involves regulated activity, that the required children's barred-list information has been obtained.

Where a DBS certificate has disclosed information relevant to suitability, the academy must obtain a copy of the certificate from the agency before the individual begins work, in accordance with the applicable statutory requirements.

On arrival, the academy must verify that the person presenting for work is the person to whom the agency's written assurance relates.

Agency and third-party supply staff must be included on the single central record, even if they work at the academy for only one day. The record must include the required details of the written notification and relevant checks.

The academy will not routinely require every agency worker to present an original DBS certificate where the statutory written-assurance arrangements have been satisfied. This does not prevent the academy from obtaining a certificate where legally required or where information has been disclosed.

6.10 Availability and cover for the designated safeguarding lead

During term time, the designated safeguarding lead or a suitably trained deputy will be available during academy hours for staff to discuss safeguarding concerns.

Each academy must maintain robust cover arrangements for periods when the designated safeguarding lead is unavailable due to illness, leave, training or other circumstances. The arrangements must be clearly understood by staff and must ensure that concerns are received, monitored and acted upon without delay.

Arrangements may include:

- named and appropriately trained deputy designated safeguarding leads;
- a confidential safeguarding mailbox or equivalent secure system;
- clear monitoring and escalation responsibilities;
- arrangements for handover of urgent and ongoing concerns;
- cover for trips, extended provision and out-of-hours activities; and
- contingency arrangements where both the designated safeguarding lead and usual deputies are unavailable.

If the designated safeguarding lead or a deputy is unavailable in exceptional circumstances, this must not delay protective action. Staff should speak to a member of the senior leadership team and, where necessary, seek advice from local authority children's social care or make a direct referral. Any action taken must be shared with the designated safeguarding lead or a deputy as soon as practicably possible.

7. Confidentiality

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Under Schedule 3, Part 4, Paragraph 19 of the DPA 2018 schools are exempt from providing pupils' personal data where the serious harm test is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met . Where in doubt we may seek independent legal advice.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's information sharing advice for practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3

8. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Staff must also recognise that children may not feel ready or know how to tell someone they are being abused

8.1 If a child is in immediate danger

Make a referral to children's social care and/or the police immediately if a child is in immediate danger or at risk of harm. Anyone can make a referral. The NPCC's When to call the police guidance should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

Tell the DSL immediately if you make a referral directly. Local procedures for making a referral, as agreed with the local safeguarding partners, are set out in each school's child protection procedures.

The following link to the GOV.UK webpage for reporting child abuse to your local council, allows you to enter your postcode and provides contact details for your local authority :
https://www.gov.uk/report-child-abuse-to-local-council

8.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. 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
- Reassure them that they are being taken seriously and that they will be supported and kept safe. Never give the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Children and young people should never be made to feel ashamed for making a report.
- 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 in CPOMS as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. If you do not have access to CPOMS, the school's child protection procedures will say what you need to do.
- If a referral to children's social care and/or the police is required, this will usually be made by the DSL. If, in an exceptional circumstance where a child is in immediate danger, you make a referral to children's social care and/or the police directly (see 7.1), tell the DSL immediately that you have done so

8.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that female genital mutilation comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Female genital mutilation is illegal in the United Kingdom and is a form of child abuse with serious and potentially lifelong consequences.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.
All staff should speak to the DSL and follow local safeguarding procedures with regard to any concerns about FGM. There is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

The duty above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

8.4 If you have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.
All staff should be aware that children 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. For example, children may feel embarrassed, humiliated, or be being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below). Sources of advice before making a referral to

the local authority are in each school's child protection procedures. You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

Support before statutory intervention, community-based Early Help and Family Help
All staff should be prepared to identify children who may benefit from additional support before statutory intervention. Support may be provided through:

- universal services;
- community-based Early Help;
- targeted early help delivered through Family Help;
- support and services provided under section 17 of the Children Act 1989; or
- statutory child protection intervention where the relevant threshold is met.

Staff must understand the locally published criteria for action, including the level of need at which a child or family should be supported through community-based Early Help, targeted Family Help, section 17 services or statutory child protection processes. Staff must also understand the local protocol for assessment and the academy's arrangements for making and escalating referrals.

Where community-based Early Help is appropriate, the designated safeguarding lead or a deputy will generally lead liaison with other agencies and support the establishment of an inter-agency assessment, where required. Staff may be asked to contribute to an assessment or, where appropriately qualified and permitted by local arrangements, act as the lead practitioner.
Where targeted Family Help is appropriate, the academy will work with the local authority and relevant partner agencies to provide coordinated support. Family Help may include targeted early help and services provided under section 17 of the Children Act 1989.

Any support plan must be kept under regular review. Where the child's circumstances do not improve, deteriorate or indicate that the child has been harmed or is at risk of harm, the designated safeguarding lead or person making the referral must consider escalation or referral to local authority children's social care.

Family Help and Early Help must never be used as a substitute for an immediate referral where a child is suffering or is likely to suffer harm. In such circumstances, a referral to local authority children's social care, and where appropriate the police, must be made immediately.

Referral
If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL immediately.

The DSL may seek external advice before making a referral (each school's child protection procedures include details of local sources of advice). However, this should not delay the referral. The DSL makes the referral according to the locally agreed timescales and procedures (details are in each school's child protection procedures). The referral will note all previous intervention by the school with the child, any relevant history relating to the child, their siblings or the family. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. The DSL shares information with other relevant professionals, recording reasons for sharing information and ensuring that they are aware of what action the other professionals will take as a result of information shared. The DSL informs parents that they have made a referral, if the parent does not already know, and if there is no reason not to let them know. The local authority may suggest delaying informing the parent in cases of suspected physical or sexual abuse, or where informing the parent might put the child at further risk, to prevent the

child being harmed or intimidated (and retracting their disclosure) or in cases of suspected Fabricated or Induced Illness.

The DSL remains in close communication with other professionals around the child /family, in order to share any updates. If a child protection investigation is pursued, the DSL and other key school staff will:

- Work closely and collaboratively with all professionals involved in the investigation, to keep the child safe
- Attend a child protection conference when invited and provide updated information about the child
- Attend any subsequent child protection review conferences.
- Attend core group meetings and take an active role in the implementation of the protection plan

The local authority will make a decision within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

8.5 If you have concerns about extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

8.6 Action where there are concerns about a child

Where a member of staff has any concern about a child's welfare, the member of staff must take immediate action, follow the academy's child protection procedures and speak to the designated safeguarding lead or a deputy without delay.

The designated safeguarding lead or a deputy will consider the concern and determine whether:

- the child can be supported through the academy's pastoral arrangements;
- universal services or community-based Early Help should be accessed;
- a Family Help assessment should be undertaken; or
- a referral should be made to local authority children's social care and, where appropriate, the police.

Where a referral is not initially required, the academy will provide or coordinate appropriate support and keep the child's circumstances under review. If concerns escalate or the child's situation does not improve, the designated safeguarding lead or a deputy will reconsider whether a referral is required.

Where the designated safeguarding lead or a deputy decides that a referral is necessary, the academy will follow the referral process set out in the relevant local safeguarding-partner criteria for action and local protocol for assessment. The police will also be contacted where appropriate.

Action following a referral

Local authority children's social care should acknowledge receipt and decide the type of response required within one working day. The response may include:

- immediate protection and emergency action;
- assessment and services under section 17 of the Children Act 1989;
- enquiries under section 47 of the Children Act 1989;
- another form of assessment or service; or
- no formal assessment, with consideration of pastoral support, universal services, community-based Early Help or Family Help.

The referrer must follow up if the outcome of the referral is not provided. Staff must do all they reasonably can to support children's social care and any statutory assessment.

At every stage, staff must keep the child's circumstances under review, involve the designated safeguarding lead or a deputy as required and re-refer or use the relevant local escalation procedure if appropriate. The child's best interests must remain the primary consideration.

Where a child is in immediate danger or is suffering or likely to suffer harm, a referral to local authority children's social care and, where appropriate, the police must be made immediately.

8.7 Concerns about a staff member, including supply staff, volunteers and contractors

If you have concerns about a member of staff, including supply staff, volunteers and contractors at a school, speak to the headteacher. If you have concerns about the headteacher (or a relative of the headteacher working at the school), speak to the relevant trust executive headteacher and trust safeguarding lead. Details of the headteacher and executive headteacher will be in the school's child protection procedures.

The headteacher/ executive headteacher will then follow the procedures set out in appendix 3. Where appropriate, schools with Early Years provision will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail). If you have concerns about a member of the trust's central team, speak to the chief executive officer.

If you have concerns about the chief executive officer, speak to the chair of the board of directors. They will then follow the procedures set out in appendix 3.

8.8 Child on child abuse, including sexual violence and sexual harassment

All staff must recognise that children can abuse other children and that this may occur inside or outside the academy and online. Child-on-child abuse is a safeguarding issue for the child who has experienced the harm and for the child alleged to have caused it.

Child-on-child abuse may include:

- bullying, including cyberbullying and prejudice-based or discriminatory bullying;
- racism, faith-targeted abuse and other discriminatory incidents;
- abuse within intimate relationships between children;
- physical abuse or assault;
- serious physical harm or threats involving a weapon;

- harmful sexual behaviour;
- harassment or violence;
- making or sharing nudes or semi-nudes, including AI-generated or manipulated imagery;
- forcing another child to participate in harmful activity;
- upskirting; and
- initiation or hazing-type violence and rituals.

The Trust has a zero-tolerance approach to abuse. This means that all concerns will be taken seriously and responded to. It does not mean that every incident will result in the same response or sanction. Action will be child-centred, proportionate and based on the circumstances and assessed risk.

No incident should be dismissed as banter, having a laugh, part of growing up or typical behaviour associated with a particular group. Even where there are no reported cases, staff must remain alert to the possibility that abuse is occurring but has not been disclosed.

Academies will:
- maintain clear, accessible and well-promoted reporting arrangements;
- record and respond to all concerns;
- support children to express their wishes and views;
- protect the child who has experienced harm;
- consider the safeguarding and support needs of the child alleged to have caused harm;
- consider risks to siblings, witnesses and other children;
- identify patterns in behaviour, locations and times;
- undertake appropriate risk and needs assessments;
- provide preventative education and early support; and
- refer to statutory services where the relevant threshold is met.

The designated safeguarding lead or a deputy will lead the response. Decisions about referral to children's social care or the police will be made on a case-by-case basis, informed by the nature of the concern, the level of harm and risk, the children's ages and development, vulnerability, power imbalance, the child's wishes and any local safeguarding or police advice.

A referral must not be delayed where a child has been harmed, is at risk of harm or is in immediate danger. Equally, the academy will not apply an automatic referral rule without considering the individual circumstances and relevant statutory thresholds.

Disciplinary action and safeguarding support are not mutually exclusive. A child alleged to have caused harm may require a sanction and safeguarding intervention at the same time.

The DFE Statutory Guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education and produced a one-stop page for teachers: teaching about relationships sex and health

8.9 Responding to reports of harmful behaviour

Immediate response

Staff must act immediately on concerns and must not wait for a child to make a direct verbal disclosure. Concerns may come from a friend, an overheard conversation, online information, changes in behaviour or other indirect indicators.

When a child makes a report, staff should:
- listen carefully and respond respectfully;
- reassure the child that the report is being taken seriously;

- explain that the child is not to blame;
- avoid making promises of confidentiality;
- explain what will happen next and who must be informed;
- ask only open and necessary questions;
- avoid investigating or seeking unnecessary detail;
- record the child's words accurately without interpretation or personal opinion; and
- inform the designated safeguarding lead or a deputy as soon as practicably possible.

Where possible, a report may be managed with two members of staff present, preferably including the designated safeguarding lead or a deputy, where this is consistent with the child's wishes and does not delay support.

Risk and needs assessment

Following a report of the most serious violence or harm, the designated safeguarding lead or a deputy will undertake an immediate recorded risk and needs assessment. For other forms of harassment or harmful behaviour, the need for an assessment will be considered case by case.

The assessment should consider:

- the child's immediate safety and support needs;
- the child's wishes;
- the child alleged to have caused harm;
- potential additional victims;
- witnesses and other affected children;
- wider risks to the academy community and staff;
- the location and time of the incident;
- online and social-media risks;
- transport and travel arrangements;
- any power imbalance;
- SEND, communication or health needs;
- extra-familial harm, exploitation or peer-group dynamics; and
- any requirement for specialist or statutory assessment.

The assessment must be regularly reviewed and used to inform safeguarding decisions. Action to protect children must not wait for the commencement or conclusion of an external investigation.

8.10 Reasonable force and restrictive intervention

There are limited circumstances in which it may be appropriate for a member of staff to use reasonable force to safeguard a child or another person. Reasonable force means using no more force than is necessary for the least amount of time. Any decision to use force must be based on the individual circumstances and the professional judgement of the member of staff concerned.

The Trust does not operate a blanket "no contact" approach, as this could prevent staff from taking appropriate action to protect or support a child.

When considering the use of reasonable force in relation to a child with SEND, a medical condition or a mental health need, staff must recognise the child's additional vulnerability and consider:

- the child's individual needs and communication;
- reasonable adjustments required under the Equality Act 2010;
- known triggers and de-escalation strategies;
- the child's behaviour, support or risk-management plan;
- the potential effect of trauma or previous experiences; and
- whether a less restrictive response is available.

Academies will use positive and proactive support to reduce the likelihood that restrictive intervention becomes necessary. Any incident involving the use of reasonable force must be recorded, reviewed and communicated in accordance with Trust procedures.

The use of force must never be used as punishment.

8.11 Operation Encompass

Operation Encompass is an information-sharing arrangement between the police and relevant educational settings. The statutory police notification duty applies where the police have reasonable grounds to believe that a child may be a victim of domestic abuse, including where the child was not physically present during the incident but is connected to the household.

Operation Encompass notifications do not replace normal safeguarding procedures or referrals to children's social care or the police.

The designated safeguarding lead is normally the academy's Operation Encompass Key Adult. Each academy will ensure:

- a secure and reliable route for receiving notifications;
- appropriate cover when the designated safeguarding lead is unavailable;
- prompt review and action in response to each notification;
- confidential and secure recording;
- access restricted to staff who need the information;
- appropriate support for the child;
- consideration of whether further safeguarding action or referral is required; and
- sensitive engagement with the child and family where appropriate.

Information must be handled in accordance with data protection laws and must not be shared more widely than is necessary to safeguard and support the child.

8.12 Contextual safeguarding

All staff should 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 is known as contextual safeguarding. Contextual safeguarding requires staff to consider the wider social, environmental, and community influences on children's safety and welfare.

Children may be vulnerable to harm or exploitation from peers or adults in a range of extra-familial settings, including:

- Local parks, shopping centres, transport routes or online spaces
- Youth clubs or sports teams
- Places of worship
- Homes of friends or acquaintances

These extra-familial harms can include (but are not limited to):

- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE), including county lines
- Serious youth violence and gang involvement
- Radicalisation and extremist influence
- Harmful sexual behaviour from peers or others outside school.

All staff, but particularly the Designated Safeguarding Lead (DSL) and their deputies, should consider whether children are at risk of harm in these wider contexts when assessing safeguarding concerns or

making referrals. It is essential that safeguarding concerns are not limited to the child's home life, and that staff demonstrate professional curiosity in exploring concerns beyond the immediate school setting.

Staff should:
• Be vigilant for signs that a child may be involved in or at risk of extra-familial harm, such as
• unexplained absences, sudden changes in friendship groups, possession of unexplained money or
• items, or signs of distress or fear around certain individuals or locations.
• Report any concerns to the DSL immediately, even if the suspected harm originates from outside the
• school environment.
• Recognise that young people may not always disclose the full extent of harm or may normalise
• unsafe behaviours due to peer pressure or grooming.
• Work collaboratively with social care, police, youth justice and community agencies to develop a full
• picture of the child's circumstances.

The DSL will ensure that referrals and support plans take into account the wider context of the child's experiences, and where appropriate, include information about locations, peer associations, and online behaviour. The DSL will also ensure that contextual information is included in early help assessments, statutory assessments, or child protection plans when working with external agencies.

By understanding and addressing the contexts in which abuse occurs, our schools aim to provide holistic support to safeguard children and help them navigate the risks they face beyond the school gates

8.13 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect both male and female children and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Further information, including definitions, indicators, referral expectations and links to modern slavery arrangements, is contained in Part one and Annex A of Keeping Children Safe in Education.

Children can become trapped by criminal exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

Professionals should be aware that girls (as well as boys) are at risk of criminal exploitation. Both boys and girls at risk of criminal exploitation may be at higher risk of sexual exploitation.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child,

who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

8.14 Serious violence and weapons

Serious violence is a safeguarding concern and may involve physical assault, carrying a weapon, threatening another person with a weapon or using a weapon. It may arise in the context of bullying, peer conflict, exploitation, criminal activity or extra-familial harm.

Staff must immediately report any concern that a child is carrying, using or threatening to use a weapon, or intends to do so, to the designated safeguarding lead or a deputy. Where there is an immediate threat to life or safety, staff must contact the police through 999 and follow the academy's emergency procedures.

The designated safeguarding lead will assess:

- the immediate risk to the child and others;
- the child's vulnerability and any indicators of exploitation;
- the context and motivation for carrying or using a weapon;
- peer conflict and risk of retaliation;
- risks immediately before or after the school day and during travel;
- the safety of other pupils and staff;
- whether police or social care involvement is required; and
- what immediate safety and support arrangements are necessary.

The academy will establish and regularly review a recorded safety and support plan where required. This may include protective measures, trusted-adult support, pastoral intervention, action to de-escalate peer conflict and coordinated work with police, social care, youth services or other relevant agencies.

Children who commit or are alleged to have committed violence may themselves have been harmed, exploited or traumatised. Disciplinary action and safeguarding support are not mutually exclusive and may be required at the same time.

Advice for schools is provided in the Home Office's Preventing youth violence and gang involvement and its criminal exploitation of children and vulnerable adults: county lines guidance.

8.15 Prejudice-based harm and discriminatory abuse

The Trust recognises that children may experience prejudice-based harm, including racism, faith-targeted abuse and other forms of discriminatory behaviour. Such experiences may adversely affect a child's safety, welfare, wellbeing, mental health, attendance, educational engagement and willingness to seek help.

Staff must be alert to indicators of prejudice-based and discriminatory harm and must not dismiss incidents as banter, conflict, cultural difference or an inevitable part of growing up. Where behaviour may affect a child's welfare or sense of safety, it must be considered within the academy's safeguarding arrangements and reported to the designated safeguarding lead or a deputy.

Academies will promote an inclusive and anti-discriminatory culture in which racism, faith-based prejudice, misogyny, misandry, homophobia, biphobia, discriminatory bullying and other prejudicial behaviour are recognised, challenged, recorded and addressed.

The designated safeguarding lead will consider whether an incident is isolated or forms part of a wider pattern, whether other children may be affected and whether action is required through safeguarding, behaviour, pastoral, curriculum or multi-agency arrangements.

8.16 Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

8.17 Elective Home Education (EHE)

If a parent/carer expresses their intention to remove a child from school with a view to educating them at home, our schools will work together with the local authority and other key professionals to coordinate a meeting with the parent/carer where possible. Ideally, this will be before a final decision has been made, to ensure the parent/carer has considered what is in the best interests of the child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. Whether or not it proves possible to arrange such a meeting, the headteacher will write to the parent/carer making clear the school's preference to retain children in school.

9. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

10. Children who may require additional support

Any child may benefit from support before statutory intervention. Staff should be particularly alert to the potential need for additional support for a child who:

- is disabled, has SEND or has a medical or health condition;
- has a mental health need;
- is a young carer;
- is pregnant or is a parent;
- has demonstrated early signs of abusive, violent or harmful behaviour;
- is repeatedly removed from the classroom, has experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion or attends Alternative Provision;
- is frequently missing from education, home or care;
- is at risk of exploitation, violence, modern slavery or trafficking;
- is affected by criminal or financial exploitation, including county lines;
- is affected by parental offending or has a parent or carer in custody;
- is affected by domestic abuse, substance misuse or adult mental ill health within the family;
- is at risk of radicalisation;
- is at risk of honour-based or faith-based abuse;
- is privately fostered; or
- is living in circumstances that may adversely affect safety, welfare, attendance, development or educational outcomes.

This list is not exhaustive. Staff must remain professionally curious and consider the individual child's presentation, circumstances, vulnerabilities and wider context.

10.1 Children with special educational needs, disabilities or health conditions

Children with SEND, disabilities or certain medical or physical health conditions may face additional safeguarding challenges both online and offline. Staff must recognise that additional barriers can exist when identifying abuse, neglect or exploitation. These may include:

- assumptions that behaviour, mood, injury or distress relate to the child's condition without further exploration;
- increased isolation or greater exposure to bullying and discriminatory behaviour;
- communication barriers and difficulty describing or reporting what has happened;
- difficulty understanding that an experience or behaviour is abusive;
- dependence on adults for care or support;
- intimate-care needs;
- limited opportunities to communicate without the presence of a carer;
- cognitive difficulties in distinguishing fact from fiction in online content;
- repeating online content or behaviour without understanding its meaning or consequences; and
- harm having a disproportionate effect without obvious outward signs.

Staff must not attribute indicators of possible harm to SEND or a medical condition without considering alternative explanations and demonstrating professional curiosity.

Any safeguarding concern involving a child with SEND, a disability or a relevant health condition will require close liaison between the designated safeguarding lead or deputy and the SENCO or person with oversight of SEND. The academy will consider whether the child requires additional pastoral support, communication support, reasonable adjustments or specialist assistance to express their wishes and participate safely in safeguarding processes.

10.2 Safeguarding children with medical conditions

A single incident relating to the management of a child's medical condition or allergy will not automatically require a safeguarding referral. A safeguarding response may be required where the circumstances indicate that a child is experiencing or is at increased risk of abuse, neglect or exploitation.
This may include circumstances where:

- essential information about a child's medical condition is repeatedly withheld;
- a child is repeatedly sent to the academy without essential medication or equipment;
- recommended treatment is persistently unavailable to the child;
- the child's condition is deliberately misrepresented or inadequately managed; or
- the circumstances suggest a wider pattern of neglect or harmful behaviour.

Staff must report any related safeguarding concern to the designated safeguarding lead or a deputy. The designated safeguarding lead will consider the concern alongside the child's medical plan, attendance, presentation, family circumstances and any other relevant information and will seek advice or make a referral where required.

10.3 Mental health and safeguarding

All staff should be aware that mental health difficulties can, in some circumstances, develop into safeguarding concerns. They may also indicate that a child has experienced or is at risk of abuse, neglect or exploitation. Potential concerns may include self-harm, disordered eating, suicidal thoughts, plans to end life, significant changes in behaviour, persistent sleep difficulties, withdrawal from social situations, loss of interest in usual activities or signs that a child is neglecting personal care.
The presence of one or more indicators does not necessarily mean that a child has a mental health condition or is at immediate risk. Staff must nevertheless act on concerns, avoid making a diagnosis and report safeguarding concerns to the designated safeguarding lead or a deputy.

Only appropriately trained professionals should diagnose a mental health condition. The academy's role includes:

- promoting positive mental wellbeing;
- identifying concerns at an early stage;
- providing or arranging proportionate and evidence-informed support;
- working with parents and carers where doing so does not place the child at additional risk; and
- liaising with the senior mental health lead, Mental Health Support Team and specialist services where appropriate.

Where a child appears to be in immediate danger, emergency assistance must be sought through 999 or the child must be taken to accident and emergency by a parent, carer or other suitable person. Where urgent mental health help is required but the situation is not an emergency, staff should follow the local urgent-support pathway, which may include NHS 111 and selection of the mental health option.

Mental health support must not replace a referral to children's social care or the police where there is reason to believe that a child has been harmed or is at risk of harm.

10.4 Children who are lesbian, gay or bisexual

A child being lesbian, gay or bisexual is not in itself a safeguarding risk. However, children who are lesbian, gay or bisexual, or who are perceived by others to be lesbian, gay or bisexual, may be vulnerable to discriminatory bullying, harassment or abuse.

Staff must be alert to these vulnerabilities and must take appropriate action to prevent and respond to bullying, harassment, discrimination and abuse. Concerns affecting a child's welfare or safety must be reported and considered through the academy's safeguarding procedures.

Academies will provide an inclusive environment in which pupils can identify trusted adults, report concerns and access appropriate pastoral support. Relevant sanctions will be applied where behaviour falls below the standards set out in the academy's behaviour policy.

10.5 Children who are questioning their gender

A child may question the way the child feels about being a boy or a girl, including the physical attributes of the child's biological sex and how the child fits within society.

The academy will not initiate social transition or suggest that a child should socially transition. This section applies where a child or the child's parent or carer requests that the academy make changes or put support in place relating to social transition.

Staff must not make individual changes relating to social transition unless a decision has been made through the academy's agreed process.

Where a child raises questions about gender or requests support, staff will respond respectfully, listen to the child and seek to understand the full range of the child's experiences. Staff will be professionally curious about any wider factors that may be affecting the child, including:

- family and peer relationships;
- bullying or discrimination;
- mental health and emotional wellbeing;
- SEND or neurodiversity;
- online influences;
- safeguarding concerns; and
- any relevant clinical evidence or professional advice.

A child discussing feelings or questions about gender does not automatically create a safeguarding concern. Normal safeguarding procedures must, however, be followed where the conversation raises a concern about the child's safety or welfare.

Parental involvement
Where a child requests support involving changes by the academy, parents or carers will normally be involved as a matter of priority and their views will be carefully considered.
In the rare circumstances where involving a parent or carer may place the child at greater risk, the designated safeguarding lead must be consulted before the parent or carer is contacted or any decision is made.

Considering a request
Any request for support with social transition will be considered individually. No automatic decision or blanket approach will be applied.

The headteacher will lead the decision-making process with appropriate involvement from:
- the child;
- the child's parents or carers, unless there is an identified safeguarding reason not to involve them;
- the designated safeguarding lead;
- the SENCO or other relevant staff;
- relevant clinical or other professional advisers, where appropriate; and
- appropriate Trust leaders.

The academy will consider:
- the best interests, safety and welfare of the child;
- the safety, welfare, privacy and dignity of other children;
- the child's age and developmental stage;
- the child's SEND, health and any wider psychosocial needs;
- relevant safeguarding information;
- the views of the child and parents or carers;
- relevant clinical evidence or professional advice;
- the Trust's duties under safeguarding, equality and human-rights law;
- the available evidence concerning the requested intervention; and
- the feasibility and impact of the requested arrangements.

Primary academies will exercise particular caution when considering requests involving full social transition for pre-pubertal children.

Recording and review
The request, information considered, consultation undertaken, decision reached and reasons for the decision must be recorded. Information must be accurate, confidential and restricted to staff with a professional need to know.

Decisions will be reviewed where:
- the child's circumstances or wishes change;
- new safeguarding or professional information becomes available;
- the arrangements are adversely affecting the child or other children;
- the child wishes to reverse or amend an earlier request; or
- the arrangements are no longer safe, suitable or practicable.

The designated safeguarding lead must be involved immediately if new safeguarding concerns emerge.

Support for a child questioning gender must not include access to toilets, changing rooms, showers or overnight accommodation designated for the opposite biological sex. Any request relating to sport will be considered in accordance with the safeguarding and sport provisions within this policy.
The academy will take appropriate action to prevent and respond to bullying, harassment or discrimination affecting any child.

10.6 Alternative Provision

Where an academy commissions Alternative Provision, the academy remains responsible for safeguarding the pupil and for assuring itself that the placement is safe, suitable and capable of meeting the pupil's individual needs. Before a placement begins, the academy must:

- undertake proportionate safeguarding and suitability due diligence;
- obtain written confirmation that appropriate safeguarding and safer recruitment checks have been completed;
- obtain written assurance that the provider will notify the academy of staff changes or any other arrangement that may place the child at risk;
- record the provider's address and the address of any subcontracted, satellite or additional site the pupil may attend;
- establish clear attendance-reporting and absence-response arrangements;
- identify named safeguarding contacts;
- clarify how concerns and allegations will be reported; and
- establish arrangements for regular review.

The academy must always know where the child is expected to be during school hours. The placement will be reviewed at least half-termly to confirm that:

- the child is attending regularly;
- the provision remains safe;
- the placement continues to meet the child's needs;
- safeguarding information is being shared appropriately; and
- agreed educational, pastoral and safeguarding support is being delivered.

Where a safeguarding concern arises, the placement must be reviewed immediately. The academy will consider whether the placement should be suspended or terminated unless and until the concern has been satisfactorily addressed.

Use of a provider included on a local authority list or register does not remove the academy's responsibility to undertake its own due diligence and ongoing monitoring.

10.7 Children in temporary accommodation

The Trust recognises that homelessness and placement in temporary accommodation can create or increase risks to a child's welfare, safety, attendance, stability and educational outcomes.

Local housing authorities have a duty to notify educational institutions when a child is placed in temporary accommodation where the required consent has been provided. Receipt of such a notification does not replace the academy's existing safeguarding, attendance or welfare responsibilities and does not remove the need for a referral where a child has been harmed or is at risk of harm.

On receipt of a notification, the designated safeguarding lead or a deputy will consider:

- the effect of the placement on the child's safety and welfare;
- travel, attendance and punctuality;
- access to medication, equipment and health services;
- SEND provision and reasonable adjustments;
- the child's emotional wellbeing;
- any existing involvement from social care or other agencies;
- practical support required by the family; and
- whether an Early Help, Family Help or statutory referral is required.

Where appropriate, the academy will liaise with the local housing authority, local authority children's services and other relevant professionals.

10.8 Young carers

The Trust recognises that caring responsibilities can affect a child's attendance, attainment, behaviour, health and emotional wellbeing.

Staff should be alert to indicators that a child may be providing regular or substantial care or emotional support to a family member. Children may not identify themselves as young carers and may be reluctant to disclose their responsibilities.

Where a young carer is identified, the academy will:

- listen to the child's wishes and experiences;
- consider the effect of caring responsibilities on safety, attendance and learning;
- avoid punitive responses to difficulties arising from the caring role;
- consider appropriate pastoral and educational support;
- work with parents and carers where safe and appropriate; and
- seek support from relevant local authority, health, Early Help or Family Help services.

Where a concern indicates that the child is experiencing neglect, inappropriate caring responsibilities or another form of harm, the academy will follow its child protection procedures.

11. Online safety, generative AI and AI-generated content

11.1 Online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Each academy will adopt a whole-school approach to online safety that protects and educates children and staff in their use of technology and provides effective arrangements for identifying, reporting, responding to and escalating concerns.

Online safety will be treated as a running and interrelated safeguarding theme. It will be considered within safeguarding and child protection arrangements, curriculum planning, staff training, parental engagement, filtering and monitoring, staff conduct, acceptable use arrangements and the work of the designated safeguarding lead.

Online risks can be categorised into four broad areas:

- Content: exposure to illegal, inappropriate or harmful material, including racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme violence, misinformation, disinformation and conspiracy theories.
- Contact: harmful interaction with other users or with generative AI applications that simulate interaction. This may include peer pressure, harmful advertising, grooming, coercion or exploitation for criminal, financial or other harmful purposes.
- Conduct: behaviour online that increases the likelihood of harm, including bullying and making, altering, sending or receiving inappropriate or explicit imagery, including content generated or manipulated using artificial intelligence.
- Commerce: risks including gambling, inappropriate advertising, phishing, scams and other forms of financial harm.

The Trust recognises that artificial intelligence can create new or intensified safeguarding risks. Images and other content may be digitally altered or wholly generated using artificial intelligence, including deepfakes. Staff must treat concerns involving AI-generated or manipulated material as safeguarding concerns and report them in accordance with the academy's procedures.

Where generative AI is used for educational or administrative purposes, its use must comply with the Trust's acceptable-use, online-safety, data-protection, information-security and staff code-of-conduct requirements. AI applications used within Trust settings must be considered as part of the academy's assessment of online risk and its filtering and monitoring arrangements.

Children will be taught, in an age-appropriate and developmentally appropriate way, how to recognise manipulation, harmful content, online grooming, inappropriate AI-generated content, misinformation and pressure from other users, and how to seek help and report concerns.

11.2 Making or sharing nudes or semi-nudes

For the purposes of this policy, making or sharing nudes or semi-nudes includes the creation, sending or posting of nude or semi-nude images, videos or livestreams by children under the age of 18. Images may be taken by a child or another person, digitally altered or wholly generated using artificial intelligence.

Every incident involving the making or sharing of nudes or semi-nudes requires a safeguarding response, whether the sharing is reported as consensual or non-consensual. The response must be proportionate and take account of the children's ages, development, needs and vulnerabilities, together with any indicators of coercion, pressure, exploitation, manipulation or wider harm.

Staff must:

- report the incident to the designated safeguarding lead or a deputy immediately;
- not view, copy, print, forward, store, save or ask a child to download or share the imagery;
- report immediately if the material has been viewed accidentally;
- not investigate the incident or question children in detail;
- not blame or shame any child involved;
- explain that the concern must be shared with the designated safeguarding lead; and
- reassure the child that the academy will provide appropriate help and support.

The designated safeguarding lead will manage the response in accordance with current UKCIS guidance, local safeguarding arrangements and, where relevant, police and children's social care advice. Where preservation of a device or potential evidence is required, the designated safeguarding lead will seek appropriate advice before action is taken.

11.3 Mobile phones and mobile technology

Trust academies will be mobile phone-free environments for pupils by default. Pupils should not have access to or use a mobile phone during the school day, including during lessons, movement between lessons, breaktimes and lunchtimes.

Any exception must be justified by the needs and circumstances of the individual child, formally agreed by the headteacher or an authorised senior leader and clearly recorded. Examples may include a reasonable adjustment or a specific medical, safeguarding or communication need.

Each academy will publish and implement clear procedures setting out:

- how pupil mobile phones must be stored;
- the circumstances in which an exception may be agreed;
- how breaches will be managed;
- the arrangements for educational visits and residential activities;
- the use of wearable and smart technology;
- the safeguarding response where a device may contain evidence of harm; and
- when searching, screening or confiscation arrangements may apply.

Staff use of mobile phones and other personal devices must comply with the Trust staff code of conduct, acceptable-use arrangements and this policy. Personal devices must not be used to record images or information about children except where specifically authorised in an emergency and in accordance with Trust procedures.

11.4 Filtering and monitoring

The Trust and its academies will do all that they reasonably can to limit children's exposure to online risks through Trust IT systems. Appropriate filtering and monitoring systems will be in place on academy devices and networks.

Each academy will:

- identify and assign clear roles and responsibilities for managing filtering and monitoring;
- review the effectiveness of filtering and monitoring at least once every academic year;
- ensure the review is led by the senior leader responsible for filtering and monitoring, with support from the designated safeguarding lead and relevant IT support;
- check that filtering operates appropriately on all internet-connected devices and in all relevant academy locations;
- keep a written record of the review and any checks undertaken;
- ensure harmful and inappropriate content is blocked without unreasonably restricting teaching and learning;
- maintain monitoring arrangements that reflect the academy's safeguarding needs;
- take account of the age range, vulnerabilities and needs of pupils and how frequently they access Trust systems;
- ensure relevant staff understand the systems in place and know how to identify and escalate concerns; and
- consider how filtering and monitoring requirements apply to the use of generative AI.

The designated safeguarding lead is responsible for understanding the safeguarding implications of filtering and monitoring and contributing to the assessment of risk. Technical implementation and maintenance will be undertaken by appropriately authorised technical personnel. Overall accountability remains with the Trust and academy leadership.

11.5 Information security, cyber security and access management

The Trust recognises that protecting personal information and maintaining secure IT systems form part of its wider safeguarding responsibilities.

The Trust and its academies will take proportionate steps to:

- protect personal and safeguarding information from unauthorised access, disclosure, loss or alteration;
- ensure access to safeguarding systems is restricted to those with a professional need;
- establish appropriate identity, authentication and access-management arrangements;
- consider and implement measures aligned with the Department for Education's cyber security standards;
- ensure staff understand how to report suspicious activity, unauthorised access, cyber incidents and personal-data breaches;
- assess the safeguarding implications of any information-security incident;
- maintain arrangements for responding to and recovering from disruption to safeguarding systems; and
- review access promptly when staff change role or leave the Trust.

Safeguarding records must not be transferred through personal accounts or stored on unauthorised devices or systems.

12. Information sharing and data protection

Information sharing is vital to identifying and responding to abuse, neglect and exploitation and to promoting children's welfare and educational outcomes.

For the purposes of this policy, "data protection laws" refers collectively to the Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025.

Data protection laws do not prevent information being shared for the purposes of safeguarding children and promoting their welfare. Fears about information sharing must not be allowed to stand in the way of protecting a child.

Staff should be proactive in sharing information as early as possible where this is needed to identify, assess or respond to risks. When deciding what information to share, staff should consider:

- its relevance to the safeguarding concern or current risk;
- what the recipient needs to know to safeguard or support the child;
- whether the information is accurate, clearly presented and appropriately contextualised;

- whether sharing is necessary and proportionate; and
- whether omitting information could prevent the recipient from understanding or managing the risk.

Information should be shared only with those who need it for a safeguarding or professional purpose. The reasons for sharing or withholding information, together with decisions reached and action taken, should be recorded.

Where staff are uncertain, they should seek advice from the designated safeguarding lead, data protection officer or information governance lead. Seeking advice must not delay necessary action to protect a child.

12.1 Child protection records and transfer of information

Child protection records must be clear, factual, accurate, up to date, confidential and stored securely. Records should distinguish between:

- information directly observed or disclosed;
- professional opinion;
- information received from another source;
- current safeguarding concerns; and
- historic information.

Where a child leaves an academy, including through an in-year transfer, the designated safeguarding lead or a deputy will ensure that the child protection file is transferred to the receiving school or college as soon as possible and within five days for an in-year transfer or within the first five days of a new term.
The file must be transferred securely and separately from the main pupil file, and confirmation of receipt must be obtained.

The exporting academy should include a clear and structured safeguarding summary identifying:

- current concerns and assessed risks;
- relevant context;
- action and referrals undertaken;
- ongoing support needs;
- relevant protective factors;
- risk to the child or other people;
- any existing safety or support plan; and
- the professionals or services currently involved.

Extensive historical information should be presented with sufficient context to ensure that past concerns are not confused with current risk. The original safeguarding record must remain intact and must not be altered or selectively deleted.

The receiving academy must ensure that an appropriately trained member of staff promptly reviews the information, seeks clarification where information is unclear or incomplete and ensures that identified risks and support needs are acted upon.

Where information indicates a risk to the child, other pupils or staff, the receiving academy must undertake an appropriate risk assessment and establish a safety and support plan. Where there are significant concerns, it is good practice for the designated safeguarding leads at the exporting and receiving settings to have a direct professional conversation.

Safeguarding information must be used to protect and support the child and must not be used to unfairly disadvantage the child.

13. Complaints and concerns about safeguarding practices

13.1 Complaints against staff Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

13.2 Other complaints Please refer to our complaints policy.

13.3 Whistleblowing Please refer to our whistleblowing policy.

14. Safeguarding and Child Protection Training

The Trust is committed to ensuring that all staff receive appropriate safeguarding and child protection training, including online safety training, to equip them with the knowledge and skills required to safeguard and promote the welfare of children.

All staff, including supply staff, volunteers, governors and directors, will receive safeguarding and child protection information as part of their induction. This will include:

- Part One of Keeping Children Safe in Education;
- the Trust Safeguarding Policy;
- the academy's child protection procedures;
- the behaviour policy, including measures to prevent bullying, cyberbullying and discriminatory behaviour;
- the staff code of conduct;
- the safeguarding response to children who are absent from education;
- information about the role and identity of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs);
- arrangements for reporting and recording safeguarding concerns; and
- information regarding online safety, filtering and monitoring systems.

All staff will receive safeguarding and child protection training, including online safety training, at regular intervals. In addition to formal training, safeguarding updates will be provided as required and at least annually. Updates may take the form of staff briefings, meetings, training sessions, emails, newsletters or other appropriate communications.

The Trust recognises that safeguarding is an ongoing responsibility and therefore promotes a culture of continuous professional development. Staff are expected to remain alert to emerging safeguarding issues and participate fully in safeguarding training and updates.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will undertake training that enables them to carry out their roles effectively and that is regularly updated in accordance with statutory guidance and local safeguarding partner requirements. They will also maintain their knowledge and skills through regular engagement with safeguarding partners, professional development opportunities, safeguarding networks and relevant updates.

Governors and directors will receive safeguarding and child protection training appropriate to their strategic responsibilities. This will include training on safeguarding governance, safer recruitment, the Trust's safeguarding arrangements and their statutory responsibilities under Keeping Children Safe in Education 2026.

The Trust will maintain appropriate records of safeguarding training, induction and updates for all staff, governors, directors and volunteers.

15. Monitoring arrangements

This policy will be reviewed annually by the trust lead on safeguarding. At every review, it will be approved by the board of directors.

16. Links with other policies

This policy links to the following trust policies, procedures and guidelines:

- Safer recruitment and selection
- Staff and person in a position of trust code of conduct
- Complaints
- Whistleblowing
- Data Protection and Freedom of Information
- Health and safety
- Acceptable use of ICT
- Harmful sexual behaviour
- Online Safety

It also links to the following school policies and procedures:

- Child protection
- Behaviour
- Attendance
- Relationships Education (primary)/Relationships and Sex Education (secondary)
- Health Education
- First aid
- Curriculum
- Supporting pupils with medical conditions
- Special educational needs and disabilities
- Educational visits

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

The Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

Appendix 2: safer recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in a single central record (SCR). Schools maintain an SCR of their staff and the trust maintains an SCR of central staff. Copies of the checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Appointing new staff

When appointing new staff, we will:

- Verify their identity. It is important to ensure the person is who they claim to be, this includes being aware of the potential for individuals to change their name. Best practice is to check the name on their birth certificate, where it is available.
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below).
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to undertake teaching work
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK.
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state
- Require a full, written employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment
- Seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. References should always be obtained from the candidate's current employer. Where a candidate is not currently employed, verification of their most recent period of employment and reasons for leaving should be obtained from the organisation at which they were employed. If a candidate is not currently working with children but has done so previously, secure a reference from the relevant employer from the last time they worked with children. References should be completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect of disciplinary investigations).
- Ensure that appropriate checks are carried out to ensure that relevant individuals are not disqualified under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and Childcare Act 2006.
- Carry out an online search as part of our due diligence on shortlisted candidates (see our recruitment and selection policy and guidance for more details). This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview.

Regulated activity relating to children

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended.

A person will be engaged in regulated activity relating to children where the relevant statutory conditions are met. This includes:

- paid or unpaid work involving teaching, training, instructing, caring for or supervising children;
- providing advice or guidance to children relating to their physical, emotional or educational wellbeing;
- driving a vehicle used only for children;
- other relevant work in a specified establishment, including a school, where the work provides an opportunity for contact with children; and
- relevant personal care or healthcare provided by, or under the direction or supervision of, a regulated healthcare professional.

Work involving teaching, training, instructing, caring for or supervising children, or other relevant work in a specified establishment, will normally be regulated activity where it is carried out:

- frequently;
- on more than three days in any period of 30 days; or
- overnight where the relevant statutory conditions are satisfied.

Relevant personal care and healthcare are regulated activities regardless of frequency.
Supervision does not remove an individual from regulated activity where the statutory activity and frequency conditions are met.

Most staff working in Trust academies will be engaged in regulated activity and will require an enhanced DBS check including children's barred-list information. Barred-list information must not be requested for a person who is not engaged in, or seeking to engage in, regulated activity.

Where a member of staff or volunteer moves from a role that is not regulated activity to a role that is regulated activity, the academy must undertake the checks required for the new role before the individual begins that activity.

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

The academy must obtain written notification from the relevant agency or third-party organisation confirming that it has carried out the checks that the academy would otherwise be required to undertake for the individual concerned.

In relation to the enhanced DBS check, the written notification must confirm that the appropriate certificate has been obtained by the employment business or another relevant business. Where the role involves regulated activity, the academy must receive confirmation that the required children's barred-list information has been obtained.

Where an enhanced DBS certificate obtained before the individual begins work has disclosed any matter or information, or information has otherwise been provided to the employment business, the academy must obtain a copy of the certificate from the agency or organisation.

On arrival, the academy will verify that the person presenting for work is the same person to whom the agency's written assurance relates.

Agency and third-party supply staff must be included on the single central record, even where they work at the academy for only one day. The single central record must include:

- whether written confirmation has been received that the relevant checks have been completed and the appropriate certificates obtained;

- the date on which the written confirmation was received; and
- whether details of an enhanced DBS certificate have been provided.

The academy will not routinely require every agency worker to present an original DBS certificate where the statutory written-notification arrangements have been satisfied. This does not prevent the academy from obtaining a certificate where it is legally required or where information has been disclosed.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at a trust school has had the appropriate level of DBS check.

This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that relevant individuals are not disqualified under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) Regulations 2018 and Childcare Act 2006.

Volunteers

The academy will determine whether a volunteer's duties constitute regulated activity by considering the nature and frequency of the activity.

A volunteer who teaches, trains, instructs, cares for or supervises children frequently, on more than three days in any 30-day period, or overnight where the statutory conditions are satisfied, will be engaged in regulated activity. Where a volunteer will engage in regulated activity, the academy must obtain an enhanced DBS check including children's barred-list information.

Where an individual satisfies the frequency condition through volunteering at more than one setting, the relevant settings should work together to determine who will apply for the enhanced DBS check, including children's barred-list information. The resulting information should be supplied to each setting in accordance with the relevant DBS arrangements.

Existing volunteer roles will be reviewed against the current definition of regulated activity. Where an existing volunteer is brought within regulated activity, the academy must obtain the required children's barred-list information through an enhanced DBS check including barred-list information.

A separate barred-list check may be undertaken in the limited circumstances permitted by KCSIE and DBS requirements. Where the academy is subject to the Early Years Foundation Stage framework, a volunteer must not begin regulated activity within that provision until the academy has received the enhanced DBS certificate including children's barred-list information.

Where a volunteer will not engage in regulated activity, the academy will undertake and record a written risk assessment to determine what checks, if any, are appropriate. The risk assessment will consider:

- the nature of the volunteer's work with children;
- the frequency and duration of the activity;
- the age, needs and vulnerability of the children;
- what the academy knows about the volunteer;
- whether suitable referees are available;
- the location and circumstances of the activity;
- the arrangements for supervision; and
- whether another level of DBS check is legally available and proportionate.

Depending on the role and the outcome of the risk assessment, this may include an enhanced DBS check without children's barred-list information or, where appropriate and legally available, a basic DBS check.
Under no circumstances will a volunteer for whom no appropriate checks have been obtained be left unsupervised or permitted to engage in regulated activity.

Details of the risk assessment and the decision reached must be recorded.

Governors
All directors and local governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board of directors will have their DBS check countersigned by the secretary of state. All directors and local governors will have the following checks:

- Section 128 direction
- Other checks deemed necessary if they have lived or worked outside the UK

Alternative Provision
Where an academy commissions Alternative Provision, it remains responsible for safeguarding the pupil and must undertake and record appropriate due diligence, safer-recruitment assurance and ongoing monitoring.

The academy must obtain written confirmation from the provider that appropriate safeguarding checks have been completed for individuals working at the provision. The provider must also confirm that it will notify the commissioning academy of staffing changes or other arrangements that may place the child at risk.

The full requirements relating to provider addresses, subcontracted or satellite provision, attendance monitoring, safeguarding liaison, placement reviews and action where safeguarding concerns arise are set out in Section 10 of this policy under Alternative Provision.

Adults who supervise pupils on work experience
When organising work-experience placements, the academy will ensure that the placement provider has appropriate policies and procedures in place to protect children from harm.

Where a person will teach, train, instruct, care for or supervise a child on work experience frequently, on more than three days in a 30-day period, or overnight where the statutory conditions are satisfied, that person will be engaged

in regulated activity. A person who is included on the children's barred list must not be permitted to undertake regulated activity.
Other individuals in the workplace who are not involved in teaching, training, instructing, caring for or supervising the child will not be engaged in regulated activity simply because the child is present in the workplace.

The academy will consider:

- the nature and duration of the placement;
- the child's age, needs and vulnerability;
- who will supervise the child;
- the nature and frequency of supervision;
- whether the activity constitutes regulated activity;
- what safeguarding assurance is required from the provider;
- the provider's arrangements for reporting concerns; and
- how the child will report a concern or seek help.

The academy will ensure the child knows who to contact if an emergency occurs or if anything during the placement causes concern or discomfort.

The academy will have regard to the legal restrictions on requesting enhanced DBS checks with children's barred-list information for employees supervising children aged 16 or 17 on work experience.

Pupils staying with host families (homestay)

Where a trust school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Pupils should understand who to contact during a homestay should an emergency occur or a situation arise which makes them feel uncomfortable.

Where a period of UK homestay lasts 28 days or more, for a child aged under 16 years of age (under 18 years of age if the child has disabilities), this may amount to private fostering (see below).

Where a trust school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Private fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative, in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children. School staff should notify the DSL as soon as they become aware of private fostering arrangements. The school will then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. Comprehensive guidance on private fostering is available in the Department for Education's statutory guidance on private fostering. Additional information is also included in Part three of Keeping Children Safe in Education.

Appendix 3:

Safeguarding concerns and allegations made about staff, including supply staff, volunteers and contractors This appendix is divided into two parts: the first covers allegations that may meet the harms threshold, whilst the second covers allegations/concerns that do not meet the harms threshold (referred to in Part four of KCSIE as 'low level concerns').

Part one: allegations that meet the harms threshold
This section of the policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

It applies regardless of whether the alleged abuse took place in a school. Where an allegation might meet the harms threshold, above, we will follow the guidance in Part four of Keeping Children Safe in Education. Where an adult makes an allegation to a school that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children's social care and the police. Abuse can be reported no matter how long ago it happened.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Supply teachers and contracted staff
In some circumstances schools will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers or contracted staff provided by an employment agency or business.

Whilst schools are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. We will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst an investigation is carried out. Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school, are under their supervision, direction and control when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, schools should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about policies.

Suspension

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the trust

Definitions for outcomes of allegation investigations

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher/chief executive officer (or chair of the board of directors where the headteacher/chief executive officer is the subject of the allegation) – the 'case manager' – will take the following steps:

Before contacting the LADO, conduct basic enquiries in line with local procedures to establish the facts and help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example, whether:

- the individual was in the school at the time of the allegations
- the individual did or could have come into contact with the child
- there were any witnesses
- there is any CCTV footage

If you are unsure whether an allegation meets the threshold for referral to the LADO, please speak to the Trust Trust Safeguarding Lead, Sarah Williams. However, do not let seeking advice cause unreasonable delay to making a referral; referrals should be made within 24 hours of the allegation being made.

If you make a LADO referral, please forward a copy of the referral to williamss@allsaintsmat.org who will ensure that the CEO is aware.

- Immediately discuss the allegation with the designated officer at the local authority (contact information is provided in a table at the end of this appendix). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting

the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or children's social care services, as appropriate. The advice of the trust's Head of HR (or in their absence an HR Business Partner) and the trust's lead on safeguarding (or in their absence the trust's linked director of education) must also be sought. Before an employee is suspended, the Headteacher must discuss it with the CEO, Deputy CEO and Chair of the local academy council without delay.
- If immediate suspension is considered necessary, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school/trust and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. The individual facing the allegation may wish to call the Education Support Partnership, free on 08000 562 561 or visit their website at www.educationsupportpartnership.org.uk
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- Inform the Trust Trust Safeguarding Lead and Inclusion (williamsS@Allsaintsmat.org) and the CEO (DugganH@Allsaintsmat.org) that you have made a referral to the designated officer at the local authority, providing the following information:
    - Date of referral
    - First name (of the person referred)
    - o Surname (of the person referred)
    - Post (of the person referred)
    - School
    - Name of the person making the referral
    - Role of the person making the referral (this should be the Head or Director of Education if the allegation is about the Head)
    - Reason(s) for the referral

Schools with Early Years provision will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the trust is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency (TRA).

Where the police are involved, wherever possible the trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the trust's disciplinary process, should this be required at a later point.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will instigate appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer (LADO) whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the trust ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the trust's Head of HR will discuss with the LADO whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and the trust's Head of HR will discuss with the LADO whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The trust will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer (LADO), police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain a clear and comprehensive record of any concern or allegation that may meet the harm threshold. The record will be stored securely on the confidential personnel file of the person who is the subject of the allegation.

The record will include:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of the action taken;
- the decisions reached and the reasons for those decisions;
- the recorded outcome, namely substantiated, unsubstantiated, unfounded, false or malicious;
- a copy provided to the person concerned where this has been agreed with children's social care or the police; and
- a declaration setting out whether the information will be referred to in any future employment reference.

Details of allegations that are found following investigation to be **malicious or false** will be removed from personnel records unless the individual gives consent for the information to be retained.

Records relating to allegations that are substantiated, unsubstantiated or unfounded will be retained at least until the person has reached normal pension age or for a period of ten years from the date of the allegation, whichever is longer.

The purpose of retaining records is to:

- enable accurate information to be provided in response to future reference requests;
- provide clarification where a future DBS check discloses information concerning an allegation that did not result in a criminal conviction; and
- prevent unnecessary reinvestigation if an allegation is raised again.

Records will be retained, accessed, shared and destroyed in accordance with data protection laws and the Trust's retention arrangements.

References

Employer references will contain factual information about substantiated safeguarding allegations that meet the harm threshold where inclusion is appropriate and lawful.

References will not include:

- allegations found to be false;
- allegations found to be unfounded;
- allegations found to be unsubstantiated;

- allegations found to be malicious; or
- repeated concerns or allegations where all were found to be false, unfounded, unsubstantiated or malicious.

Low-level concerns will not be included in references unless they relate to matters that would normally be included in a reference, such as substantiated misconduct or poor performance.
Information included in a reference will be factual and will not include unsupported opinion.

Learning lessons
After any cases where the allegations are substantiated, we will review the circumstances of the case with the local authority's designated officer (LADO) to determine whether there are any improvements that we can make to the trust's procedures or practice to help prevent similar events in the future.
This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

LADO contact information

Local Authority	LADO telephone number	LADO email address	Link to Referral Form
Liverpool	Catherine Ballans - 0771 670 2034 Pauline Trubshaw - 0784 172 7309	lado@liverpool.gov.uk	Liverpool Safeguarding Children Partnership - LADO referral
St Helens	Duty team 01744 671265	safeguardingunit@sthelens.gov.uk	St. Helens Safeguarding Children Partnership - LADO referral
Sefton	0151 934 3783	safeguardingunitadmin@sefton.gov.uk	Sefton Safeguarding Children Partnership - Managing Allegations (Local Authority's Designated Officer)

Part two: concerns that do not meet the harms threshold
As part of their whole school approach to safeguarding, our schools will ensure that they promote an open and transparent culture in which all concerns about all adults working in, or on behalf of the school (including supply staff, volunteers and contractors), are dealt with promptly and appropriately.

Low level concerns
The term 'low level' concern does not mean that it is insignificant, it means that the behaviour does not meet the harms threshold set out above. A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a nagging doubt – that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff (and persons in a position of trust) code of conduct, including inappropriate conduct outside of work, but that does not meet the harms threshold for referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to policy;

- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that might look inappropriate but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Sharing, recording and dealing with low level concerns appropriately not only keeps children safe but also protects those working in or on behalf of schools.

Reporting low level concerns
Low level concerns should be reported. Staff are encouraged and should feel confident to self -refer where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or, on reflection, believe they have behaved in a way they consider falls below the expected professional standards. Where a low level concern relates to a person employed by a supply agency or a contractor, the concern should still be reported as above, and recorded as set out below. In addition, their employer should be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Recording low level concerns
All low level concerns will be recorded in writing. The record should include details of the concern, the context in which the concern arose, action taken and the rationale for decisions. The name of the individual sharing their concerns should also be noted. If the individual wishes to remain anonymous that should be respected as far as reasonably possible. The records must be kept confidential and held securely. They must be retained at least until the individual leaves the school's/trust's employment.

Responding to low level concerns
The headteacher (or the relevant trust director of education if the low level concern is about the headteacher or a relative of the headteacher working at the school) should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously ;
- to the individual involved; and,
- to any witnesses

The headteacher should be the ultimate decision maker in respect of all low level concerns, although it is recognised that depending on the nature of some low level concerns and/or the role of the DSL in some schools, the headteacher may wish to consult with the DSL and take a more collaborative decision making approach.

If schools are in any doubt as to whether the information which has been shared about a member of staff as a low level concern in fact meets the harms threshold, they should consult with their LADO. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, it must be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school/trust that enabled the behaviour to occur and, where appropriate, policies should be revised or extra training delivered to minimise the risk of it happening again.

References
Low level concerns should not be included in references unless they relate to issues which would normally be included, for example, misconduct or poor performance. However, where a low level concern (or group of concerns) has met the threshold for referral to the LADO, and been found to be substantiated, it should be referred to in a reference.

Appendix 4: specific safeguarding issues

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) schools should give them practical advice on how to keep themselves safe. Lessons should focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5 to 11 year olds and 12 to 17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children absent from education

All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's unauthorised absence procedures and children missing education procedures.

Where reasonably possible, our schools will hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and is good practice to give us additional options to make contact with a responsible adult when a child who is absent from education is also identified as a welfare and/or safeguarding concern.

We will follow our procedures for unauthorised absence and for children missing education, particularly on repeat occasions, to help identify the risk of abuse, neglect and exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing.
If a staff member suspects that a child is suffering from abuse, neglect or exploitation we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is in immediate danger or at risk of harm.

Children with family members in prison
Children with family members in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate the negative consequences for those children.

Staff will inform the DSL if they know a pupil has a family member in prison so that the DSL can ensure appropriate support is in place.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and

- regularly miss school or education or do not take part in education.

We will provide children who have been exploited with additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: definition and guide for practitioners

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE, as detailed above, may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'traphouse or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM (National Referral Mechanism) is available in the Modern Slavery Statutory Guidance: Modern slavery: how to identify and support victims.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our organisation or in any of our supply chains under the Modern Slavery Act 2015.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offences, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices - National Crime Agency, Keeping children safe online (NSPCC) and National Cyber Security Centre (NCSC).

Domestic abuse

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act). Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass

The Trust's arrangements for receiving, recording and acting upon Operation Encompass notifications are set out in Section 8of this policy under Operation Encompass.

Operation Encompass notifications do not replace statutory safeguarding procedures. Where the information received indicates that a child has been harmed or is at risk of harm, the designated safeguarding lead or a deputy will consider whether a referral to local authority children's social care and/or the police is required. Notifications will be handled securely and confidentially in accordance with data protection laws.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC How to Protect Children From Domestic Abuse
- Refuge - domestic abuse organisation for women
- SafeLives - Young people and domestic abuse spotlight
- Domestic abuse: specialist sources of support (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Operation Encompass (includes information for schools on the impact of domestic abuse on children)

If a member of staff suspects that a pupil is experiencing or being exposed to domestic abuse, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL should ensure appropriate referrals are made based on the child's circumstances.

Child Abuse linked to Faith or Belief (CALFB)

Child abuse linked to faith or belief is not confined to one faith, nationality or ethnic community. Examples

have been recorded worldwide across various religions including Christianity, Islam and Hinduism. Faith abuse is often considered as part of the group that comes under the umbrella term of harmful practices.

Child abuse linked to faith or belief can include a belief in concepts of

- Witchcraft and spirit possession, demons or the devil acting through children or leading them astray
- (traditionally seen in some Christian beliefs);
- The evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu
- context);
- Ritual or multi murders where the killing of children is believed to bring supernatural benefits, or the
- use of their body parts is believed to produce potent magical remedies;
- Use of belief in magic or witchcraft to create fear in children to make them more compliant when they
- are being trafficked for domestic slavery or sexual exploitation.

Parents/carers/abusers are more likely to have the belief that what they are doing will save the child, family or the wider community and therefore it is for the greater good. Examples of abuse linked to faith/belief include children being:

- Beaten;
- Burnt;
- Cut/stabbed;
- Semi-strangled;
- Tied up;
- Or having chilli peppers or other substances rubbed on their genitals or eyes.

They may not be allowed near, or to share a room with, family members and/or be threatened with abandonment. They may also be persuaded that they are possessed. Appropriate medical care, supervision, education, good hygiene, nourishment, clothing or warmth may be withdrawn.

Children who have been singled out in this way can be particularly vulnerable to sexual abusers within the family, community or faith organisation that use the belief as a form of control/threat. Exorcisms/deliverances may include sexually abusive practices such as having to undress and be bathed in the presence of others. Child traffickers may use these beliefs to control children.

It should be noted that a child can be abused because of faith or belief without these factors being present and not all those who believe in witchcraft or spirit possession harm children.

Indicators that children may be at risk of CALFB include;

- Disclosure of rituals or ceremonies
- Fear of being cursed or bringing misfortune
- Injuries or emotional withdrawal following religious events
- Frequent absences linked to spiritual practices

Children of all ages and gender can be vulnerable to this form of abuse, however, children may be singled out for being ‘different’. Children with behavioural issues and/or additional needs or disabilities may be seen as possessed, as may children who are gifted and talented. If a child has recurring ill-health or is the result of a difficult pregnancy, this may also lead to them being singled out. It may be decided that a particular child in the family is responsible for the misfortunes/difficulties within the family.

Children living with extended family or carers other than their parents, particularly those in private foster placements, can be at increased risk of abuse linked to faith or belief.

CALFB must be treated as a safeguarding issue, and not a cultural matter. Staff should never dismiss a child's disclosure as a 'religious practice'. Referrals should be made through the usual safeguarding routes, and the DSL should consult with the local Multi Agency Safeguarding Hub (MASH), and, where applicable, the Local Authority Designated Officer (LADO).

So-called 'honour-based' abuse (HBA) (including Female Genital Mutilation and Forced Marriage)
So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the DSL. As appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

FGM
The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 8 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM. Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations o Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having a limited level of integration within UK society

- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

Where there is a concern that a child may be at risk of forced marriage, staff must report the concern to the designated safeguarding lead or a deputy without delay.
Staff must not:

- approach family members or members of the community without advice;
- attempt to mediate between the child and family;
- share information with family members where doing so may increase risk; or
- take action that may alert a potential perpetrator or compromise the child's safety.

The designated safeguarding lead or a deputy will:

- speak with the child in a safe and private setting;
- consider the child's immediate safety and wishes;
- activate the relevant local safeguarding procedures;
- make a referral to local authority children's social care and/or the police where appropriate;
- seek advice from the Forced Marriage Unit where required;
- record all concerns, decisions, advice and action; and
- coordinate appropriate safeguarding, pastoral and educational support.
- A referral to the LADO will only be made where the concern also relates to the behaviour or suitability of an adult working or volunteering with children.

Schools can seek advice from the Forced Marriage Unit (FMU) on 020 7008 0151 or fmu@fcdo.gov.uk The FMU has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk)

Manosphere

The manosphere is an umbrella term for a network of online communities that promote misogynistic, sexist, and anti-feminist views, often under the guise of male self-improvement or empowerment. These platforms—ranging from online forums and social media influencers to video streaming sites and podcasts—can expose children, particularly boys and young men, to harmful ideologies that normalise violence against women and

girls, encourage hypermasculinity, and promote conspiracy theories about gender roles. Schools recognise that pupils may encounter this content unintentionally or through peer sharing, and may not immediately recognise its manipulative or extremist nature. Staff will be trained to identify early indicators of manosphere influence, such as sudden changes in attitudes toward women, use of misogynistic language, or engagement with controversial online figures. Through a whole-school approach to safeguarding and education, including high-quality PSHE/RSE provision and safe spaces for discussion, schools will promote healthy relationships, respect, and critical digital literacy. The DSL will work closely with external agencies and families where concerns arise and ensure that any risks associated with manosphere content are addressed within the school's broader strategy on online safety, extremism, and mental health.

Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Protecting children from this risk forms part of the Trust's wider safeguarding responsibilities.

For the purposes of this policy:

- **Extremism** is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.
- **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.
- **Terrorism** is an action that endangers or causes serious violence to a person or people, causes serious damage to property or seriously interferes with or disrupts an electronic system, where the use or threat is designed to influence government or intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause.

There is no single way of identifying whether a child is susceptible to radicalisation. Staff must be alert to changes in behaviour, relationships, language, online activity or presentation that may indicate that a child needs help or protection.

Staff must use professional judgement, report concerns to the designated safeguarding lead or a deputy and act proportionately. Any immediate danger or suspected terrorist activity must be reported to the police.

The Prevent duty

All Trust academies are subject to the duty under section 26 of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from becoming terrorists or supporting terrorism.

The Prevent duty forms part of the Trust's wider safeguarding arrangements. Designated safeguarding leads, deputies and senior leaders must understand and follow the current Prevent duty guidance and local Prevent referral arrangements.

The designated safeguarding lead or a deputy will consider whether:

- the concern can be managed through academy support;
- universal services, Early Help or Family Help are appropriate;
- a Prevent referral should be made;
- children's social care should be contacted; or
- the police should be contacted.

Where further or new information becomes available after a Prevent referral has been made, the information must be shared promptly with the police or relevant Prevent team.

Channel is a voluntary, confidential multi-agency programme providing support to people assessed as susceptible to being drawn into terrorism. Consent is required before support through Channel is provided. The academy will cooperate with the Channel process and attend meetings where requested and appropriate.

Guidance is available at:

Prevent duty.

Making a referral to Prevent - GOV.UK.

Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk),
Channel and Prevent Multi-Agency Panel (PMAP) guidance - GOV.UK (www.gov.uk).
Educate Against Hate - Prevent Radicalisation & Extremism

The Department for Education has published training is available from:
Prevent awareness e-learning,
Prevent referrals e-learning
Channel awareness e-learning

Cultural Considerations in Safeguarding Practice
Safeguarding must be culturally competent and intersectional, recognising that cultural practices or family norms can mask abuse. Children from ethnic minority backgrounds may face additional barriers to disclosing abuse, such as fear of dishonour, deportation and racism. Staff must not assume that that any safeguarding indicators are 'normal' for the child's culture, for example, excessive punishment, isolation, early marriage. Staff must consider the impact of racism, immigration status, and discrimination on a child's lived experience.

Cultural considerations are crucial in safeguarding practice to ensure that interventions are effective, respectful, and avoid causing further harm. This involves understanding the unique cultural contexts, beliefs, and values of individuals and families, and tailoring safeguarding approaches accordingly. Staff need to be aware of their own cultural biases and avoid making assumptions, while also recognising the potential for cultural differences to impact communication and relationships.

Checking the identity and suitability of visitors
All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge. All visitors to trust schools, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into a trust school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using trust facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Harmful sexual behaviour, sexual harassment and sexual violence
The Trust's procedures for preventing, identifying, reporting, recording and responding to harmful behaviour between children are set out in Section 8 of this policy under:

- Child-on-child abuse, including harassment and violence; and
- Responding to reports of harmful behaviour.

These procedures must be read alongside the Trust's Harmful Sexual Behaviour Guidance, each academy's child protection procedures and Part five of *Keeping Children Safe in Education 2026*.

The designated safeguarding lead or a deputy will lead the academy's response and ensure that:

- immediate safeguarding action is taken;
- the child's wishes, safety and support needs are considered;
- the needs and potential risks associated with the child alleged to have caused harm are assessed;
- risks to other children, witnesses and staff are considered;
- an appropriate risk and needs assessment is undertaken and recorded;
- local authority children's social care, the police and specialist services are consulted or contacted where appropriate;
- safeguarding action is not delayed while an external investigation is awaited;

- information is shared lawfully and proportionately;
- decisions, rationale and action are recorded; and
- support and risk-management arrangements are regularly reviewed.

The academy will take a safeguarding response to every incident involving the making or sharing of nudes or semi-nudes, including imagery generated or manipulated using artificial intelligence. The response will be proportionate to the children's age, development, circumstances, vulnerabilities and any indicators of coercion, exploitation or wider harm.

The academy will follow current UKCIS guidance and will not rely on a dated edition where more recent guidance is available.

Annex B: Role of the Designated Safeguarding Lead

This annex reflects Annex B of Keeping Children Safe in Education. Where the statutory guidance is amended, the current version of the statutory guidance will take precedence.

An appropriate senior member of the academy leadership team will be appointed as the designated safeguarding lead. The designated safeguarding lead will take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. This responsibility will be explicit in the role holder's job description.

The designated safeguarding lead will have the appropriate status, authority, skills and experience to carry out the role effectively. The designated safeguarding lead will be provided with the time, funding, training, resources and support required to discharge the role.

This person should have the appropriate status and authority within the school to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection

matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy designated safeguarding leads

Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the police as required. NPCC – When to call the police should help staff understand when to consider calling the police and what to expect when working with them.

Work with others

The designated safeguarding lead is expected to:

act as a source of support, advice and expertise for all staff

- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member • liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCO's), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are

experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement, and achievement at school or college. This includes:

- ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection files

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

Records should include:

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

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

Where children leave the school (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within five days for an in-year transfer or within the first five days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required. Lack of information about their circumstances can impact on the child's safety, welfare, and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the trust's safeguarding policy and the school's child protection procedures, especially new and part-time staff.
- ensure the school's child protection procedures are reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the local governing body regarding this.
- ensure the trust's safeguarding policy and the school's child protection procedures are available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

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

- understand the assessment process for providing community-based Early Help, targeted early help through Family Help and statutory intervention, including the local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children's social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

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

Providing support to staff

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

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

Understanding the views of children

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

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them; and

- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

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

- understand the importance of information sharing within the academy, between educational settings and with safeguarding partners, agencies, organisations and practitioners;
- understand relevant data protection laws, including the Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025; and
- keep detailed, accurate and secure written records of all concerns, discussions, decisions and the reasons for those decisions, including where a referral was or was not made to children's social care, the police, Prevent or another agency.