Child Protection and Safeguarding Policy

Approved by:	Sam Griffiths, Trust Board	**Date:** 11.11.26
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Contents

Safeguarding and Child Protection Policy Statement……3

Governance……4

Policy Review……6

Local Arrangements……6

Safeguarding and Child Protection Statement 3

Local Arrangements 8

1. Aims..... 10

2. Legislation and statutory guidance..... 10

3. Definitions..... 11

4. Equality statement..... 13

4.1 Safeguarding requirements for sport and school/college premises..... 13

5. Roles, responsibilities and our local context 14

6. Confidentiality..... 20

7. Recognising abuse and taking action..... 22

8. Online safety, including cybercrime and the use of mobile technology 37

8.1 Mobile phone policy..... 39

9. Notifying parents or carers 39

10. Young person with special educational needs, disabilities or health issues 40

10.1 Safeguarding children with medical conditions..... 41

11. Young person with a social worker..... 41

12. Looked-after and previously looked-after children..... 41

13. Young carers..... 42

14. Children who are lesbian, gay or bisexual, and children who are questioning their gender..... 42

15. Alternative provision..... 43

16. Restrictive interventions and reasonable force (schools only)..... 43

17. Complaints and concerns about school/college safeguarding policies..... 43

18. Record-keeping..... 44

19. Training 45

20. Monitoring arrangements..... 47

21. Links with other policies 47

Appendix 1: types of abuse..... 48

Appendix 2: Allegations against staff (including low-level concerns) policy: 50
Appendix 3: specific safeguarding issues 59
Appendix 4 – Safer Recruitment Policy 77

Safeguarding and Child Protection Statement

Introduction

Aequalis Education Trust (AET) is committed to safeguarding and promoting the welfare of children and young people (hereinafter referred to as CYP). Safeguarding and child protection is everyone's responsibility. This policy applies to all CYP, staff, volunteers, trustees and governors in the Trust. Safeguarding goes beyond implementing basic child protection procedures, it is an integral part of all activities and functions of the Trust and each AET academy school.

The Trust aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote pupil welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

The overall responsibility for the approval of this policy sits with the Trustee Board. However, each academy school must have their own local safeguarding and child protection policy, outlining how the academy delivers safeguarding at a local level, which is reviewed on an annual basis by the relevant Local Academy Governing Body (LAGB).

Our focus is to ensure that:-

- All CYP at all times are fully safeguarded on each and every Trust Academy site and on any offsite trip/activity or journey
- All child protection matters are dealt with, in line with regulations and the best interest of the child

Statement of Intent

Local Authorities have overarching statutory responsibility for safeguarding and promoting the welfare of all CYP in their area. Whilst Local Authorities play a lead role, safeguarding children and protecting them from harm is everyone's responsibility.

Under Section 11 of the Children Act 2004 duties are placed on a range of organisations and individuals to ensure their functions are discharged with regards to the safeguarding of CYP. The statutory guidance (Working Together) does not identify a Multi Academy Trust (MAT) as a separate organisation. Schools within MAT are not named under Section 11 of the Children Act 2004 but they are captured under other legislation, for example Sections 157 and 175 of the Education Act 2002, Sections 94 (1) and (2) of the Education and Skills Act 2008, the Education Regulations 2011 and 2014.

'Keeping Children Safe in Education' is statutory guidance for schools and colleges. This guidance contains information on what schools, including academies, should do and sets out the legal duties which they must comply with. KCSIE is updated each year, and the relevant parts of the updated guidance by all staff, Local Academy Governing Board members and Trustees.

In law, individual schools are deemed to be 'relevant partners' of their local authority and as such are under a duty to co-operate in that local authority's Local Safeguarding Children's Board arrangements. The Education (Independent School Standards) Regulations 2014 apply a duty on proprietors of independent schools including academies to make arrangements for ensuring that their functions are exercised with a view to safeguarding and promoting the welfare of CYP.

This legal requirement along with the values and principles that underpin AET, mean that it is essential for us to demonstrate compliance at the local level and take on the strategic responsibility for ensuring that safeguarding practice in all our provisions is of the highest quality.

Everyone working at AET is wholly committed to ensuring that all pupils and adults are cared for in a safe and secure environment. To fulfil this commitment, comprehensive safeguarding and child protection systems are in place in line with the DfE statutory guidance, Keeping Children Safe in Education 2025.

To maintain our approach effectively and consistently, we recognise that the AET and its establishments also play an important part in the wider local and national safeguarding system for CYP. In addition, we will ensure that GDPR requirements are met in all establishments and in the Trust under the umbrella of the safeguarding imperative.

We use the term 'parent carers' to refer to: anyone with parental care responsibility for a pupil or anyone caring for a CYP (such as foster parent carers, special guardians, grandparent).

The Culture of Safeguarding

AET believes that safeguarding and promoting the welfare of CYP is the responsibility of everyone. This is demonstrated through our shared culture of safeguarding. Everyone who comes into contact

with CYP and their families has a role to play and all staff make sure their approach is wholly person-centred. This means that at all times, they consider what is in the best interests of CYP.

Our culture of safeguarding demonstrates AET's:

- moral and statutory responsibilities for safeguarding and promoting the welfare of CYP and expectation that all staff and volunteers share this commitment;
- expectation that everyone working within our establishments will contribute to the creation of an environment in which all CYP have an equal right to protection regardless of gender, religion, ethnicity, sexual identity or culture;
- expectation that Trustees and staff maintain an open mind and attitude of "it could happen here", where safeguarding is concerned. When concerned about the welfare of a CYP, staff members always act in the best interests of the CYP;
- expectation that all adults within the wider AET community are aware that they have an equal responsibility to act on any suspicion or disclosure that may suggest a CYP is at risk of harm at home, in the community or in school. Everyone is aware that they can make a referral and reporting procedures are established in every AET establishment to ensure information is shared with key safeguarding and child protection staff as soon as possible after any concern arises;
- expectation that every establishment will follow the guidance provided by AET's three local safeguarding partners (Worcestershire County Council, West Mercia Police and the Herefordshire and Worcestershire Integrated Care Board (ICB)
- commitment to nominate an executive leader as the Trust's Designated Safeguarding Lead and nomination of a trustee as having particular responsibility for safeguarding matters;
- each establishment within AET has a bespoke establishment specific Safeguarding Policy which is published on their individual websites;
- our CYPs' welfare is our paramount concern. Our Local Academy Governing Boards (LAGBs) will ensure that our establishments will safeguard and promote the welfare of pupils and work together with agencies to ensure that our establishments have adequate arrangements to identify, assess and support those CYP who are suffering or where significant harm is suggested in line with the procedures within Worcestershire County Council's Children's Social Care.

The Responsibility of the Trust Board

AET has the following roles and responsibilities in place to ensure that all Academies are compliant and have a strong safeguarding culture:

Roles	Responsibilities
Safeguarding Trustee (ST)	A Trust Board member who has an oversight of Trust-wide safeguarding and reports directly to the Board.

Executive Safeguarding Lead (ESL)	A member of the executive team who has an oversight of Trust-wide safeguarding and leads on the development of the AET safeguarding policy.
AET Director of Safeguarding	A lead DSL who takes responsibility for peer audits, the DSL peer network and who liaises closely with the ST and ESL.
LAGB Safeguarding Link	A member of the LAGB who has an oversight of safeguarding in their individual school and reports back to the LAGB. They also have the Safeguarding Trustee as point of contact to the Trust Board
Designated Safeguarding Leads	Member/s of staff responsible for safeguarding and child protection within their individual school. They liaise closely with key stakeholders, such as their staff, Principal, Safeguarding Link Governor and relevant external agencies.

Our policy applies to all staff (teaching and non-teaching) including those from the executive and central team, peripatetic, supply staff, contract staff and third-party contractors, members, trustees, governors, volunteers and visitors in the Trust. Rather than duplicating content from Keeping Children Safe in Education (September 2026) in this policy, it should be understood that the Trust will always refer to KCSIE and West Midlands Safeguarding Procedures as the benchmark for all safeguarding practice and decision-making.

Governance

The AET Safeguarding Trustee oversees the governance arrangements for Safeguarding and is a point of contact for the LAGB's Safeguarding Link Governors.

The AET Safeguarding Trustee meets with the Executive Leader for Safeguarding at the end of each term to evaluate the outcomes of scheduled audits and checks. The Safeguarding Trustee reports a summary of findings at the full Board meeting.

The LAGB are responsible for the implementation of the Safeguarding and Child Protection Policy at school level. Safeguarding will be included on the agenda and monitored at every full LAGB meeting. Each LAGB is required to have a Safeguarding Link Governor to provide feedback at LAGB meetings. The Safeguarding Link Governor meets regularly with the School's Designated Safeguarding Lead (DSL) to discuss:

- Safeguarding peer audits or external reviews
- Risks/vulnerabilities
- Compliance issues
- The effectiveness in the application of practices

- Any lessons that can be shared and
- Best practice.

The Trust Board is committed to ensuring full compliance with its safeguarding and child protection duties under statutory legislation. As delegated by the Trust Board, Chris Heath is currently the Safeguarding Trustee. He maintains oversight of the safeguarding activity and reports to the Board on key child protection and safeguarding data.

The Trust Board retains a monitoring focus on safeguarding and it is a fixed agenda item at all Trust Board meetings. Safeguarding is integral to the Trust's strategic work. An annual Trust Safeguarding Report is presented to Directors alongside updates at Trust Board meetings.

The Trust Board will monitor the academy schools' compliance with statutory requirements and practice and champion CYP protection issues. In addition, they will:

- Ensure that all safeguarding concerns are investigated, and an immediate risk assessment undertaken to ensure the safeguarding of pupils and young people.
- Ensure that the effectiveness of this Safeguarding and Child Protection policy is annually reviewed and any statutory updates are implemented immediately.
- Have safeguarding as a set agenda item on all Trust board agendas.
- Have a clear understanding of safeguarding across the Trust through reports and results of the academy schools' annual safeguarding audits.
- Written recruitment and selection policies and procedures in place.
- Appoint a board member (Chris Heath) as Safeguarding Trustee

The Supporting Structural and Quality Assurance Arrangements

Focus	**Process**
Quality Assurance	Each School has an external review of safeguarding practice once every two years. This is carried out by an expert safeguarding consultant. One Term after the review the AET Safeguarding Lead will carry out a review of the action plan instigated as a result of the review. One year after the review, a peer review of safeguarding practice will be conducted by DSLs from across the Trust. If serious concerns are raised in peer audits or external checks, they will be shared immediately with the Executive Lead for

	Safeguarding who will inform the Safeguarding Trustee and the Executive Leadership Team.
Strategic oversight and connection with the Trust Board	The Safeguarding Trustee meets with the Executive Leader for Safeguarding and the CRST Safeguarding Lead on a termly basis to evaluate findings from audits and checks and to monitor LAGB meeting minutes. Findings will be reported back to the full Board.
LAGBs	LAGB Safeguarding Link Governors meets with DSL in school on a termly basis and/or is part of the audits/checks. LAGB Safeguarding Link can contact the Safeguarding Trustee if they have concerns in relation to safeguarding in their individual school. Safeguarding a standing agenda item to be discussed at each LAGB meeting.
Peer support and collaboration	Half-termly meetings led by the AET Safeguarding Lead for School DSLs
Other duties (including statutory)	The AET Safeguarding & Child Protection policy is reviewed and updated annually or as and when required. The AET OSCR protocols are in place, and reviewed as and when required, to ensure compliance in this area.

The DSLs across AET meet and network on a half-termly basis, to pool expertise, knowledge and experience in the development and application of policies and procedures, to share good practice and to develop and embed best practice. This ensures that the core competences on child protection and safeguarding matters are being fully utilised, the DSLs network supports the development and growth of a centre of excellence on safeguarding matters across the Trust. This is supported by focused training from an external expert in the area.

Local Arrangements

ROLE/ORGANISATION	NAME
Chief Executive Officer	Deb Rattley
AET Safeguarding Trustee	Chris Heath
AET Executive Safeguarding Lead	David Snell
Director of Safeguarding	Vanessa Rancins

Part One: Safeguarding Policy

1. Aims

Aequalis Education Trust (AET) aims to ensure that:

- 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

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education 2026, and Working Together to Safeguard Children 2026. It should be read alongside What to do if you're worried a child is being abused: advice for practitioners and, where applicable, section 3 of the Early Years Foundation Stage statutory framework. The school/college will have regard to this guidance, comply with its legal duties, and follow the arrangements agreed and published by the three local safeguarding partners.

This policy is also based on the following legislation:

- The Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act 2025, referred to collectively in this policy as "data protection laws".
- The School Attendance (Pupil Registration) (England) Regulations 2024, including requirements relating to deletion from the admission register and returns to the local authority.
- The School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, including requirements relating to toilets, changing accommodation and showers.
- The Crime and Policing Act 2026, which removes the supervision exemption from regulated activity for relevant volunteer activity.
- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils/students
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), 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

- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- 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 on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Governing Board and Headteacher/Principal should carefully consider how they are supporting their young persons with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting young persons (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/students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

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 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.

Making or sharing nudes and semi-nudes means the creation, sending or posting of nude or semi-nude visual content by children under 18. Images include photographs, videos and livestreams and may be self-generated, taken or created by another person, digitally altered or wholly generated using artificial intelligence, including "deepfakes" or "deep nudes". All incidents require a safeguarding response, whether the making or sharing is consensual or non-consensual.

Children includes everyone under the age of 18.

Data protection laws means the Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025.

The three safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

1. The Local Authority (LA)
2. Integrated Care Boards (previously Clinical Commissioning Groups) for an area within the LA
3. The Chief Officer of Police for a police area in the LA area

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 and young people) 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, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. 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:

i. Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
ii. Are young carers
iii. May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
iv. Have English as an additional language
v. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
vi. Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
vii. Are asylum seekers
viii. Are at risk due to either their own or a family member's mental health needs
ix. Are looked after or previously looked after (see section 12)
x. Are missing or absent from education for prolonged periods and/or repeat occasions
xi. Whose parent/carer has expressed an intention to remove them from school to be home educated
xii. Are pregnant and/or are parents themselves.
xiii. Have exhibited early signs of abusive, violent and/or harmful behaviour.
xiv. Are repeatedly removed from classrooms, on a part-time timetable, have experienced multiple suspensions, are at risk of permanent exclusion, or attend alternative provision or a pupil referral unit.
xv. Have caring responsibilities as young carers.
xvi. Have medical conditions, including allergies, which may increase vulnerability where essential information, medication or care is not provided.

4.1 Safeguarding requirements for sport and school/college premises

Sport: where a sport is separated by sex for safety or fairness in accordance with the Equality Act 2010, participation will be organised by biological sex. Where there are no safety concerns and a child requests an alternative arrangement, the school/college will consider the request in the child's best interests, the interests of other children and the need for safe and fair participation.

Toilets: schools must not allow children to use toilets designated for the opposite biological sex. Separate toilets will be provided for boys and girls aged eight and over unless each toilet is in an individual room lockable from the inside for one user. Alternative individual facilities may be considered without compromising single-sex provision or anyone's safety, comfort, privacy or dignity. Arrangements will be recorded, communicated appropriately and reviewed regularly.

Changing rooms and showers: a child aged 11 or over at the start of the school year must not undress in front of a child of the opposite biological sex and must not use changing or shower

facilities designated for the opposite sex. Alternative private arrangements or access at a different time may be considered, without compromising single-sex provision or anyone's safety, comfort, privacy or dignity. Arrangements will be recorded and reviewed.

Boarding/residential accommodation and trips (where applicable): children will not share overnight accommodation designated for or shared with children of the opposite biological sex. Alternative arrangements will be sought where necessary without compromising any child's safety, comfort, privacy or dignity.

5. Roles, responsibilities and our local context

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, councillors and Trustees in the Trust and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended Trust and off-site activities.

The Trust plays a crucial role in preventative education. This is most effective within a whole-Trust approach that prepares young people for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence and harassment, derogatory behaviour and other forms of physical violence and conflict. Our approach will be inclusive, evidence-based, age-appropriate and stage-of-development appropriate, including for children with SEND and other vulnerabilities, and will be underpinned by our:

a. Behaviour policy
b. Pastoral support system
c. Programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    i. Healthy and respectful relationships
    ii. Boundaries and consent
    iii. Stereotyping, prejudice and equality
    iv. Body confidence and self-esteem
    v. How to recognise an abusive relationship (including coercive and controlling behaviour)
    vi. The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
    vii. What constitutes sexual harassment and sexual violence and why they're always unacceptable

All staff

a) All staff will:

i. Read and understand Part one of Keeping Children Safe in Education 2026 in full. Trust leaders and all staff who work directly with children will also read Annex A (further information).

ii. Be familiar with the school/college's safeguarding systems and procedures, including this policy, the behaviour policy, the staff code of conduct, procedures for low-level concerns and allegations against staff, whistleblowing arrangements, the identity and role of the DSL and deputies, online safety and filtering and monitoring arrangements, and the safeguarding response to children who are absent from education.

iii. Receive safeguarding and child protection training, including online safety, at induction; regularly updated training; and safeguarding updates as required and at least annually.

iv. Sign a declaration at the beginning of each academic year to say that they have reviewed and understood the guidance.

v. Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children and young people to do online (e.g. sites they need to visit or who they'll be interacting with online)

vi. Help create trusted relationships and a safe culture in which all children, including children who are lesbian, gay or bisexual and children who are questioning their gender, can speak openly and share concerns

b) All staff will be aware of:

1. our systems which support safeguarding, including:
   i. this child protection and safeguarding policy,
   ii. the staff code of conduct, including low-level concerns, allegations against staff and whistleblowing policy,
   iii. the role and identity of the designated safeguarding lead (DSL) and deputies,
   iv. the behaviour policy,
   v. the online safety policy which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring,
   vi. the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods.
2. The local arrangements for universal services and community-based early help, and the targeted early help level of Family Help, including the local criteria and levels of need, the process for assessments and the role staff may be expected to play in identifying concerns, sharing information, supporting assessments or acting as a lead practitioner where appropriately qualified.
3. The criteria and processes for referral to local authority children's social care and for statutory services under sections 17, 20, 31 and 47 of the Children Act 1989, including the role staff may be expected to play following a referral.

4. 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
5. That abuse, neglect, exploitation and safeguarding issues are rarely standalone events; multiple risks may overlap, including modern slavery, financial exploitation, stalking, teenage relationship abuse and extra-familial harm.
6. That child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator; it is preventable; early, evidence-based support can reduce the risk of further harmful behaviour; and abuse may include serious physical assault, threats involving weapons, harmful sexual behaviour, harassment or violence.
7. The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as:
    i. child-on-child abuse,
    ii. child sexual exploitation (CSE),
    iii. child criminal exploitation (CCE),
    iv. Modern Slavery
    v. indicators of being at risk from or involved with serious violent crime,
    vi. Domestic Abuse
    vii. FGM,
    viii. Forced Marriage
    ix. Radicalisation
    x. and serious violence (including that linked to county lines)
8. The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
9. The fact that children and young people can be at risk of harm inside and outside of their home, at school and online.
10. That children may not feel ready or know how to disclose abuse, neglect or exploitation, may not recognise their experiences as harmful, or may communicate concerns indirectly. Staff must maintain professional curiosity and act on concerns immediately.
11. What to look for to identify children and young people who need help or protection and the additional barriers that some children may face in recognising or reporting harm, including because of disability, SEND, communication needs, language, sexual orientation or other vulnerabilities
12. The fact that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences can significantly affect a child's welfare, wellbeing and mental health and may influence their confidence in seeking support. Staff should remain alert to the signs and impact of prejudice-based harm and ensure that any concerns are appropriately considered within safeguarding practice

Section 18 of this policy outlines in more detail how staff are trained and supported to fulfil these responsibilities.

5.3 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school/college. This includes online safety and understanding our filtering and monitoring processes on school/college devices and networks to keep young people safe online.

During term time, the DSL will be available during working hours for staff to discuss any safeguarding concerns.

The school/college will maintain robust and confidential cover arrangements whenever the DSL is unavailable because of illness, leave or other circumstances.

When the DSL is absent, the Deputy Designated Safeguarding Leads will act as cover.

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

i. Provide advice and support to other staff on child protection and welfare matters.

ii. Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.

iii. Contribute to the assessment of children.

iv. 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.

v. Assess and respond to risks of serious violence, including weapon carrying or threats, putting in place safety and support plans and considering de-escalation of peer conflict where appropriate.

vi. Respond where a potential victim of child criminal exploitation, child sexual exploitation, trafficking or modern slavery is identified, by making an immediate child protection referral to local authority children's social care and, where appropriate, the police. The DSL will work with the relevant statutory agency to ensure that a referral to the National Referral Mechanism is considered and, where appropriate, submitted by an authorised First Responder organisation.

vii. Have a good understanding of harmful sexual behaviour.

viii. Have a good understanding of the filtering and monitoring systems and processes in place at our schools/colleges.

b) **The DSL will also**:

i. Keep the Headteacher/Principal informed of any issues.

ii. Liaise with local authority case managers and designated officers for child protection concerns as appropriate.

iii. Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school/college's policies.

iv. Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.

v. Be aware that children and young people must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

c) The full responsibilities of the DSL and deputy DSLs are set out in the role-holder's job description as set out by the DfE in Annex B of the current version of Keeping Children Safe in Education. The school/college will review the job description regularly and update it whenever required.

5.4 The Governing Body

a) The Governing Body will:

i. Facilitate a whole-school/college approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development, and that all systems, processes and policies operate with the best interests of the child at their heart and that the school actively promotes an inclusive, anti-discriminatory culture in which racism and other forms of discriminatory behaviour are recognised, challenged and addressed as part of its safeguarding responsibilities.

ii. Ensure that the school/college complies with Keeping Children Safe in Education 2026, all relevant safeguarding legislation and statutory guidance, and the locally agreed multi-agency safeguarding arrangements.

iii. Evaluate and approve this policy at each review, ensure it is reviewed at least annually and updated whenever necessary, and hold the Headteacher/Principal to account for its effective implementation.

iv. Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010, including the Public Sector Equality Duty, data protection laws, and the school/college's local multi-agency safeguarding arrangements.

v. Appoint a senior board level (or equivalent) lead Governor to monitor the effectiveness of this policy and, in conjunction with the full Governing board, to take strategic leadership responsibility for the school/college's safeguarding arrangements. This person will be different from the DSL.

vi. Ensure that the DSL has the appropriate status, authority, skills and experience, together with sufficient time, funding, training, resources and support, and that robust and confidential cover arrangements are in place whenever the DSL is unavailable.

vii. Ensure all staff receive appropriate safeguarding and child protection training, including online safety and filtering and monitoring, at induction; that this training is regularly updated; and that staff receive safeguarding updates as required and at least annually.

viii. Ensure all Governors and Trustees receive appropriate safeguarding and child protection training, including online safety, at induction and that this training is updated regularly so they can provide strategic challenge and assurance.

ix. Ensure that appropriate safeguarding policies and procedures are in place, including arrangements for child-on-child abuse, children absent from education, online safety, staff conduct, low-level concerns, allegations against staff, whistleblowing and safer recruitment.

x. Ensure that the school/college has appropriate and effective filtering and monitoring. This includes:

    a. Ensuring that roles and responsibilities are clearly assigned, and that their effectiveness is reviewed at least once in every academic year by the responsible senior leader with support from the DSL and IT support, including recorded checks across relevant devices and locations

    b. Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school/college in meeting these standards

xi. Ensure that the school/college complies with Part three of Keeping Children Safe in Education 2026 in relation to safer recruitment, selection, vetting, regulated activity, the single central record and ongoing safeguarding. This includes implementing the removal of the supervision exemption so that a person, including a volunteer, who teaches, trains, instructs or supervises children on more than three days in a 30-day period or overnight is treated as being in regulated activity even where supervised, and is subject to the legally required checks.

xii. Ensure that procedures are in place to manage any safeguarding concern or allegation, no matter how small, about staff, supply staff, trainee teachers, volunteers or contractors, including concerns that may meet the harm threshold and low-level concerns that do not.

xiii. Ensure that the Chair of Governors acts as the case manager where an allegation is made against the Headteacher, and, where required, liaises with the local authority designated officer (LADO).

xiv. Ensure that where another body provides services or activities, or uses the school/college premises, appropriate safeguarding assurance is obtained, safeguarding requirements are included in any agreement, and failure to comply may result in termination of the arrangement.

xv. Ensure that safeguarding arrangements for alternative provision are effective, including written assurance about checks, accurate records of where each child is educated, regular review of placements and immediate review where safeguarding concerns arise.

xvi. Ensure that online safety is a running and interrelated theme within the whole-school/college approach to safeguarding, including the safe use of generative artificial intelligence, mobile phones, remote education, information security and cyber security.

xvii. Ensure that the school/college's policies and practice reflect the requirements of Keeping Children Safe in Education 2026 relating to children potentially at greater risk of harm, including children with SEND or medical conditions, young carers, children who are lesbian, gay or bisexual, and children who are questioning their gender.

xviii. Ensure that appropriate arrangements are in place regarding sport, toilets, changing rooms, showers and, where applicable, boarding or residential accommodation, in accordance with statutory requirements and the safeguarding provisions in Keeping Children Safe in Education 2026.

xix. Ensure that referrals are made to the Disclosure and Barring Service and, where appropriate, the Teaching Regulation Agency when the relevant legal criteria are met.

xx. Ensure that child protection files are maintained, transferred securely and promptly, and that relevant safeguarding information is shared lawfully, proportionately and in a timely manner.

xxi. Ensure that, where reasonably possible, more than one emergency contact number is held for each young person.

5.5 The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

i. Ensuring that staff (including temporary staff) and volunteers:

   a. Are informed of our systems which support safeguarding, including this policy, as part of their induction.

   b. Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.

ii. Communicating this policy to parents/carers when their child joins the school/college and via the school/college website.

iii. Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.

iv. Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 2).

v. Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

6. Confidentiality

Information Sharing Advice for Practitioners' guidance All matters relating to safeguarding and child protection will be handled in accordance with data protection laws and shared on a need-to-know basis. Information sharing is vital to identifying and tackling abuse, neglect, exploitation and modern slavery and to promoting children's welfare. The schools/colleges will have regard to the DfE's Information Sharing Advice for Practitioners, including the seven golden rules, and will support staff to exercise professional judgement.

As a school/college they will ensure compliance with UK General Data Protection Regulations (UK-GDPR) through adherence to our Data Protection Policy (available at Aequalis Education Trust - Policies). The Executive Team ensure that all colleagues understand our principles for sharing information within the school/college, trust, and with the three safeguarding partners (and other agencies as required). These are that:

i. Timely information sharing is essential to effective safeguarding.

ii. Staff will be proactive in sharing information as early as possible. Information shared will be relevant to the current safeguarding risk, necessary for the recipient to know, clearly

presented, appropriately contextualised, focused and proportionate. Information will not be omitted where it may be relevant to understanding or managing risk.

iii. The school/college will apply the serious-harm test where relevant and seek independent legal advice if uncertain about withholding pupil data.

iv. 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.

v. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

vi. 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.

vii. 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.

viii. If a victim asks the school/college not to tell anyone about the sexual violence or sexual harassment:

   a. There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.

   b. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children and young people.

   c. The DSL should consider that:

      i. Parents or carers should normally be informed (unless this would put the victim at greater risk).

      ii. The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.

      iii. Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

ix. Regarding anonymity, all staff will:

   a. Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.

b. Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.

c. Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

x. If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 17, and allegations of abuse against staff in Appendix 2.

7. Recognising abuse and taking action

All staff are expected to identify and recognise indicators of abuse, neglect, exploitation and modern slavery. Staff will recognise that risks may occur inside or outside the home or school/college and online; may overlap; and may include extra-familial harm, teenage relationship abuse (including physical, sexual and emotional abuse and stalking), financial exploitation, serious violence and child-to-parent or caregiver abuse. Staff will remain alert to children who may benefit from universal services, community-based early help, targeted Family Help or statutory intervention including any child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- has a mental health need, including concerns relating to self-harm, an eating disorder, suicidal ideation or suicide risk;
- Is a young carer
- Is pregnant and/or is a parent;
- Is bereaved, living in temporary accommodation, returning home from care, or otherwise experiencing circumstances that may increase vulnerability; or
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion, or attends alternative provision or a pupil referral unit;
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care

- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- is viewing harmful or inappropriate online content or developing unsafe relationships online.

Trustees, the Central team, Staff, volunteers and Governors must follow the procedures set out below in the event of a safeguarding issue.

7.1 Immediate danger, significant harm and action when the DSL/DDSL is unavailable:

i. If you believe a child is in immediate danger or is suffering, or is likely to suffer, significant harm, make an immediate referral to local authority children's social care and, where appropriate, the police. Call 999 where there is an immediate risk to life or safety. Anyone can make a referral**.**

ii. If the DSL or a deputy is unavailable in any other safeguarding situation, this must not delay appropriate action. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care, take action proportionate to the concern, and inform the DSL or deputy as soon as practicably possible.

The school will have regard to the Joint Herefordshire and Worcestershire Multi-Agency Levels of Need Guidance when identifying the appropriate level of support, considering whether a child and family may benefit from community-based early help or targeted Family Help, and deciding whether a referral to statutory children's social care is required. Safeguarding concerns and referrals should be made through Worcestershire Children's Social Care's Family Front Door on 01905 822666, available 9.00am to 5.00pm Monday to Thursday and 9.00am to 4.30pm on Fridays. In safeguarding emergencies outside normal office hours, contact the Emergency Duty Team on 01905 768020. If a child is in immediate danger, call 999

7.2 If a child or young person makes a disclosure to you

If a child or young person discloses a safeguarding issue to you, you should:

i. Listen to and believe them. Allow them time to talk freely and do not ask leading questions.

ii. Stay calm and do not show that you are shocked or upset.

iii. Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.

iv. Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.

v. Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. (USING: CPOMS)

vi. Sign and date the write-up and pass it on to the DSL/DDSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL/DDSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children and young people may:

i. Not feel ready, or know how to tell someone that they are being abused, exploited or neglected

ii. Not recognise their experiences as harmful

iii. Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL/DDSL if you have concerns about a child or young person.

7.3 If you discover that FGM has taken place, or a young person is at risk of FGM

i. Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and 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 3 of this policy.

ii. **Any teacher** who either:

a) Is informed by a girl under 18 that an act of FGM has been carried out on her; or

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

iii. **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

iv. The duty for teachers mentioned 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/students.

Any member of staff who suspects that a pupil is at risk of FGM, suspects that FGM may have been carried out, or discovers that a pupil aged 18 or over appears to have been subjected to FGM must speak to the DSL and follow the local safeguarding procedures.

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

1. Make a clear written record of the concern as soon as possible and report it to the DSL or a deputy immediately.
2. If the DSL or a deputy is exceptionally unavailable, this must not delay appropriate action. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Share any action taken with the DSL or deputy as soon as is practicably possible.
3. Do not assume that another colleague or professional will act or share information that may be critical to keeping the child safe. Where appropriate, any member of staff may make a referral directly to local authority children's social care and/or the police and must inform the DSL or deputy as soon as possible.

a) Support before statutory intervention

i. The DSL or deputy will consider the most appropriate response. Options may include managing support internally through pastoral arrangements, accessing universal services or community-based early help, making a referral to the targeted early help level of Family Help, or making a referral to statutory services.

ii. Where internal support is being considered, the DSL or deputy will consider whether informing parents or carers would support the child's wellbeing and whether doing so could place the child at additional risk.

iii. Where a coordinated Family Help response is required, the DSL or deputy will generally lead liaison with other agencies and arrange or contribute to an inter-agency assessment. Staff may be required to support the assessment and, where appropriately qualified and permitted by local arrangements, may act as lead practitioner, including for work with a family under section 17 of the Children Act 1989.

iv. The school/college will understand and follow the safeguarding partners' published local criteria for action, threshold document and protocol for assessment. These will set out the processes and levels of support for universal services, community-based early help, targeted Family Help and statutory services under sections 17, 20, 31 and 47 of the Children Act 1989. The DSL and deputies will ensure that these local arrangements are reflected in school/college practice. We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements, either through use of the Joint Herefordshire and Worcestershire Multi-Agency Levels of Need Guidance when identifying the appropriate level of support, considering whether a child and family may benefit from community-based early help or targeted Family Help, and deciding

whether a referral to statutory children's social care is required, or through the school/college's own internal support offer / procedures.

v. The school/college's offer of universal support, community-based early help and Family Help, and how it works with other agencies, can be found on individual school/college websites

vi. The DSL/DDSL will keep the case under constant review and the school/college will consider a referral to Herefordshire/Worcestershire Children's Social Care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

a) Referral

i. If it is appropriate to refer the case to local authority children's social care or the police, the DSL/DDSL will make the referral or support a member of staff to do so.

ii. If a member of staff makes a referral directly (see section 7.1), they must tell the DSL/DDSL as soon as possible.

iii. The local authority will make a decision within 1 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/DDSL 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.

iv. If the child's situation does not seem to be improving after the referral, the DSL/DDSL or person who made the referral must follow the WSCP escalation procedures to ensure their concerns have been addressed and that the child's situation improves. The guidance is available through the Local Partnership Website:

WORCESTERSHIRE SCHOOLS: Worcestershire Safeguarding Children Partnership Resolution of Professional Concerns Policy

7.5 If you have concerns about extremism:

i. If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL/DDSL first to agree a course of action.

ii. If in exceptional circumstances the DSL/DDSL is not available, this should not delay appropriate action being taken. You should speak a member of the senior leadership team and/or seek advice from local authority children's social care. Make a prevent referral directly, if appropriate (see below). Inform the DSL or deputy as soon as practically possible after the referral.

iii. 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 the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team. Where there is a concern that a child may be susceptible to radicalisation or becoming involved in or supporting terrorism, the DSL will assess the concern in accordance with the Prevent duty and the school's safeguarding procedures. The DSL will complete the National Prevent Referral Form and

submit it through the current referral route for the West Mercia Police area. Where there are additional child-protection or welfare concerns, a separate referral must also be made to the relevant local authority children's social care service, with the referrals cross-referenced where appropriate. Advice may be sought from the local authority Prevent or community-safety team, West Mercia Police, or the national police Prevent advice line on 0800 011 3764. If there is an immediate threat to life or an emergency, call 999.

iv. The DfE also has a dedicated telephone helpline, 020 7340 7264, which school/college staff and Governors can call to raise concerns about extremism with respect to a young person. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

v. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

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

7.6 If you have a concern about mental health:

i. Mental health problems may develop into safeguarding concerns, including self-harm, eating disorders, suicidal ideation or risk of suicide, and may also indicate that a child has suffered or is at risk of abuse, neglect or exploitation.

ii. Only appropriately trained professionals should diagnose a mental health condition. Staff are nevertheless well placed to identify potential warning signs, including significant changes in behaviour, persistent difficulty sleeping, withdrawal from social situations, loss of interest in usual activities, physical signs of self-harm or self-neglect.

iii. Staff will promote wellbeing, identify concerns early and ensure that any intervention offered by the school/college is evidence-based, safe, effective and appropriate to the child's needs and phase of education.

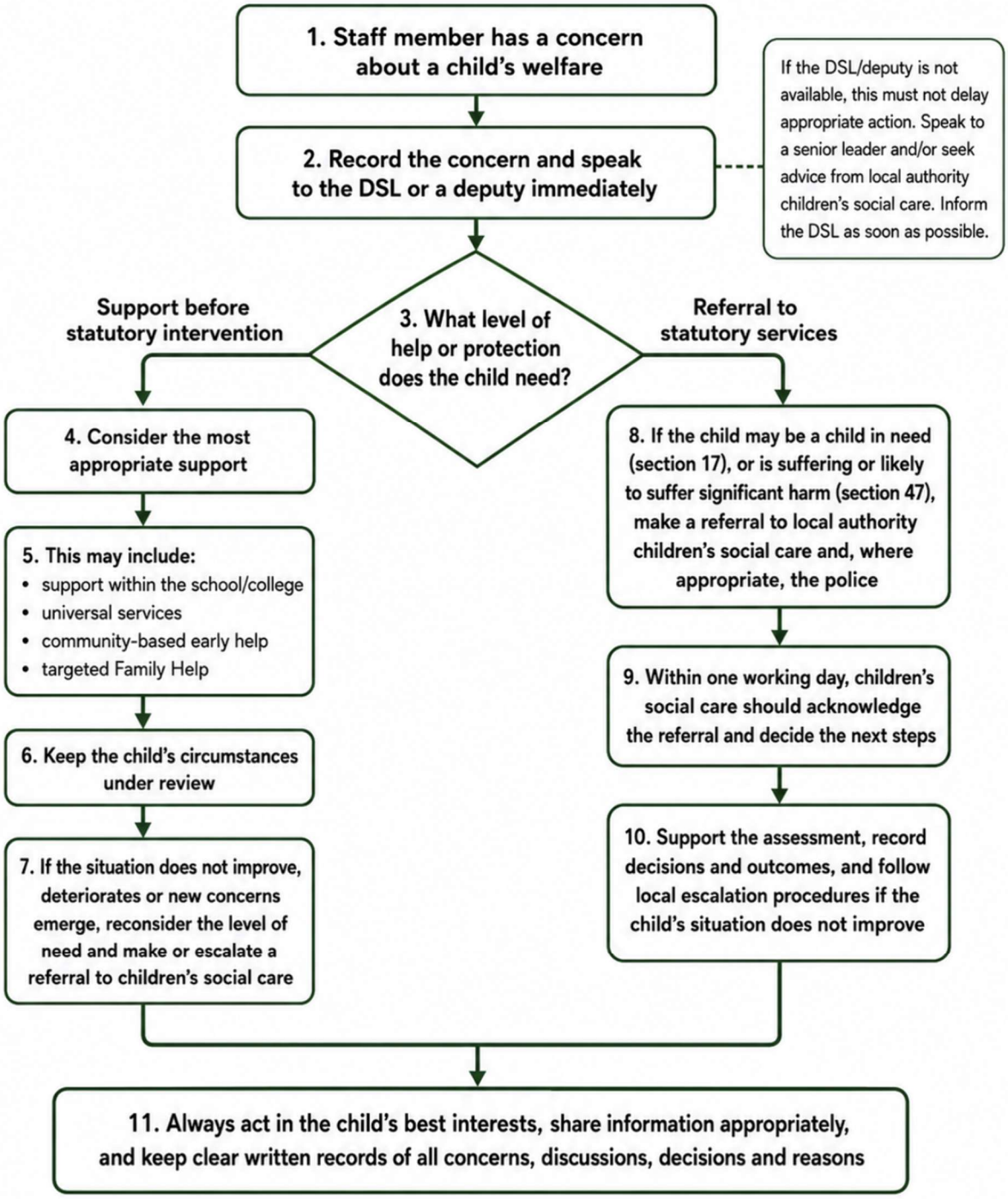
iv. If a mental health concern is also a safeguarding concern, staff must record it and speak to the DSL or a deputy immediately, following section 7.4. The DSL or deputy will consider whether informing parents or carers would support the child's wellbeing and whether doing so would place the child at additional risk.

v. If staff believe a child is in immediate danger, they must call 999 or arrange for the child to attend A&E immediately with a parent/carer or another suitable person. If urgent mental health help is needed but the situation is not an emergency, staff should use NHS 111 online or call 111 and select the mental health option.

vi. If you have a mental health concern that is **not** also a safeguarding concern, speak to the Designated Senior Mental Health Lead (see key personnel section above). Mental Health concerns should also be recorded on CPOMS

Figure 1: procedure if you have concerns about a child's welfare

Figure 1: Action where there are concerns about a child's welfare



7.7 Concerns about a staff member, supply teacher, trainee teacher, volunteer or contractor:

i. If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to the Chair of Governors.

ii. The Headteacher/ Chair of Governors will then follow the procedures set out in Appendix 2, if appropriate.

iii. Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO).

iv. If you receive an allegation relating to an incident where an individual or organisation was using the school/college premises for running an activity for children, follow our school/college safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other pupils/students

i. We recognise that children can abuse other children inside and outside school/college and online. Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. It is preventable, and timely evidence-based support may prevent further abuse or violence. Abuse will never be tolerated, normalised or passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”.

ii. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

iii. Most cases of young people hurting other young people will be dealt with under our school/college’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

   a. Is serious and potentially a criminal offence.
   b. Could place any child in the school/college at risk.
   c. Is violent or involves serious physical assault or harm.
   d. Involves a threat of harm with a weapon, carrying a weapon or using a weapon.
   e. Involves a child being forced to use drugs or alcohol.
   f. Involves sexual exploitation, sexual abuse, harmful sexual behaviour, sexual harassment or sexual violence.
   g. Involves making or sharing nudes or semi-nudes, including images that are digitally altered or wholly generated using artificial intelligence, upskirting or other sexually inappropriate images or videos.

See Appendix 3 for more information about child-on-child abuse.

Harmful sexual behaviour (HSB)

HSB is an umbrella term for sexual behaviours displayed by children and young people that are developmentally inappropriate and may be harmful or abusive. Sexual behaviour exists on a continuum from normal and developmentally expected behaviour, through inappropriate and problematic behaviour, to abusive and violent behaviour. HSB may occur online, face to face or both and will always be considered within a child-protection context.

When assessing behaviour, the DSL will consider the children's ages and developmental stages; the nature, frequency and pattern of the behaviour; any difference in age, power or developmental ability; coercion, intimidation or lack of consent; disability and vulnerability; the impact on the victim and others; and whether the behaviour may indicate the child displaying it has experienced abuse, trauma, unmet needs or exposure to abusive material.

The school/college will safeguard the victim and the wider young person body while also providing education and appropriate safeguarding support to the child displaying HSB. Support and proportionate sanctions may occur at the same time. Specialist advice will be sought where required, and support will address underlying needs and reduce the risk of repetition or escalation.

Procedures for dealing with allegations of child-on-child abuse

Incidents and allegations of Child-on-Child Abuse will be dealt with in line with our separate Child-on-Child Abuse Policy.

a) If a young person makes an allegation of abuse against another young person:

i. Record the allegation and report it to the DSL or a deputy immediately. Staff must not investigate the matter or promise confidentiality.
ii. The DSL or deputy will make an immediate safeguarding assessment, taking account of the wishes and best interests of the victim, the nature of the reported behaviour, the children's ages and developmental stages, any power imbalance, coercion, frequency or pattern, the risk to the children involved and the wider young person body, and any need to preserve evidence.
iii. The DSL or deputy will decide the appropriate response on a case-by-case basis and in accordance with local thresholds and Part five of Keeping Children Safe in Education. Options may include managing the matter internally, accessing universal services or community-based early help, referral to Family Help, referral to local authority children's social care, and/or reporting to the police.
iv. Rape, assault by penetration and sexual assault should be reported to the police. The starting point remains police referral where the alleged perpetrator is under the age of criminal responsibility, although a child under 10 cannot be prosecuted. Other potentially criminal behaviour will be considered case by case in liaison with children's social care and the police as appropriate.
v. The DSL or deputy will put proportionate risk assessments and safety and support plans in place for the victim, the child or children alleged to have caused harm, and any other children affected. This will include consideration of classrooms, shared spaces, school/college transport, online contact and times or locations where risk may be heightened.

vi. The school/college will seek advice and support from appropriate local or specialist services where required, including children's social care, police, mental health services, specialist harmful sexual behaviour services and sexual violence services.

b) Safeguarding and disciplinary action

i. The DSL will lead the safeguarding assessment, referrals, support and risk management. The Headteacher or another authorised senior leader will lead any behaviour or disciplinary process under the school/college's behaviour policy, informed by safeguarding advice from the DSL.

ii. Safeguarding support and proportionate disciplinary action are not mutually exclusive and may occur at the same time. The school/college will liaise with the police and/or children's social care so that its actions do not prejudice a criminal or statutory investigation.

iii. Where there are delays in another agency's investigation, the school/college will continue to safeguard all children and will consider what proportionate action can lawfully be taken. Decisions and their rationale will be recorded and kept under review.

Creating a supportive environment in school/college and minimising the risk of child-on-child abuse

a) We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

   To achieve this, we will:

   i. Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.

   ii. Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils/students, and initiation or hazing type violence with respect to boys.

   iii. Ensure our curriculum helps to educate young people about appropriate behaviour and consent.

   iv. Ensure young people are able to easily and confidently report abuse using our reporting systems (see section 7.10 below).

   v. Ensure staff reassure victims that they are being taken seriously.

   vi. Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.

   vii. Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.

viii. Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.

ix. Ensure staff are trained to understand:

a. How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

b. That even if there are no reports of child-on-child abuse in school/college, it does not mean it is not happening – staff should maintain an attitude of "it could happen here".

c. That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

i. Children and young people can show signs or act in ways they hope adults will notice and react to

ii. A friend may make a report.

iii. A member of staff may overhear a conversation.

iv. A child or young person's behaviour might indicate that something is wrong.

d. That certain children and young people may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.

e. That a young person harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

f. The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.

g. That they should speak to the DSL/DDSL if they have any concerns.

h. That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

b) The DSL/DDSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

c) Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school/college from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

i. Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this

ii. There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Making or sharing nudes and semi-nudes, including AI-generated images

As a Trust we refer to professional advice such as the guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders when dealing with incidents.

a) Your responsibilities when responding to an incident

i. If you become aware of any incident involving the consensual or non-consensual making or sharing of nude or semi-nude images, videos or livestreams, including content digitally altered or wholly generated using AI, you must report it to the DSL/DDSL immediately. Every such incident requires a safeguarding response.

ii. You must **not**:

   a. View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL/DDSL)

   b. Delete the imagery or ask the young person to delete it.

   c. Ask the young person(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL/DDSL's responsibility).

   d. Share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.

   e. Say or do anything to blame or shame any young people involved.

iii. You should explain that you need to report the incident, and reassure the young person(s) that they will receive support and help from the DSL/DDSL.

b) Initial review meeting

i. Following a report of an incident, the DSL/DDSL will hold an initial review meeting with appropriate school/college staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

   a. Whether there is an immediate risk to young person(s)

   b. If a referral needs to be made to the police and/or children's social care.

   c. If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

   d. What further information is required to decide on the best response.

   e. Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).

   f. Whether immediate action should be taken to delete or remove images or videos from devices or online services.

   g. Any relevant facts about the young person(s) involved which would influence risk assessment.

   h. If there is a need to contact another school/college, setting or individual.

i. Whether to contact parents or carers of the young person(s) involved (in most cases parents/carers should be involved).

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

a. The incident involves an adult

b. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN).

c. What the DSL/DDSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.

d. The imagery involves sexual acts and any pupil in the images or videos is under 13.

e. The DSL/DDSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

iii. If none of the above apply then the DSL/DDSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

c) Further review by the DSL/DDSL

i. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL/DDSL will conduct a further review to establish the facts and assess the risks.

ii. They will hold interviews with the young person involved (if appropriate).

iii. If at any point in the process there is a concern that a young person has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

d) Informing parents/carers

The DSL/DDSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

e) Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling 101.

f) Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

g) Curriculum coverage

Young people are taught about the issues surrounding the sharing of nudes and semi-nudes in an age appropriate way as part of our relationships education / relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

Young person also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images.
- The receipt of such images.

This policy on the sharing of nudes and semi-nudes is also shared with young person so they are aware of the processes the school/college will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our young people

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring young people feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

i. Put systems in place for a young person to confidently report abuse.

ii. Ensure our reporting systems are well promoted, easily understood and easily accessible for a young person.

iii. Make it clear to young people that their concerns will be taken seriously, and that they can safely express their views and give feedback.

8. Online safety, including cybercrime and the use of mobile technology

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

a) To address this, our schools/colleges aim to:

i. Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of young people, staff, volunteers and Governors.

ii. Protect and educate the whole school/college community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').

iii. Set clear guidelines for the use of mobile phones for the whole school/college community.

iv. Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

b) The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk as outlined in KCSIE:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact**: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

c) To meet our aims and address the risks above, we will:

i. Educate young people about online safety as part of our curriculum. For example:

   a. The safe use of social media, the internet and technology.

   b. Keeping personal information private.

   c. How to recognise unacceptable behaviour online.

   d. How to report any incidents of cyber-bullying, ensuring young people are encouraged to do so, including where they're a witness rather than a victim.

ii. Train staff, as part of their induction, on safe internet use and online safeguarding issues, including cyberbullying, cybercrime, online radicalisation, the safeguarding risks associated with artificial intelligence and generative AI, AI-generated or digitally altered images, harmful or simulated interactions with AI applications, and the expectations, roles and responsibilities relating to filtering and monitoring.

iii. Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.

iv. Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

    a. Staff are allowed to bring their personal phones to school/college for their own use, but will limit such use to non-contact time when young person are not present.

    b. Staff will not take pictures or recordings of young people on their personal phones or cameras.

v. Make all young people, parents/carers, staff, volunteers and Governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school/college, use of the school/college's ICT systems and use of their mobile and smart technology.

vi. Explain the sanctions we will use if a young person is in breach of our policies on the acceptable use of the internet and mobile phones.

vii. Make sure all staff, young people and parents/carers are aware that staff have the power to search young person' phones, as set out in the DfE's guidance on searching, screening and confiscation.

viii. Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school/college's IT systems.

ix. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school/college community.

x. Protect personal information and maintain appropriate cyber-security, information-security and access-management controls in line with DfE cyber-security standards for schools and colleges.

xi. Ensure the SLT member responsible for filtering and monitoring, supported by the DSL and IT support, reviews effectiveness at least once each academic year; checks filtering on all internet-connected devices in all relevant locations; records those checks; and ensures identified concerns are escalated.

xii. Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.

xiii. Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

xiv. The DSL and DDSL understand the unique risks associated with online safety (including cyber-crime) and have the relevant knowledge and up to date capability required to keep children and young people safe whilst they are online at school/college.

The above section summarises our approach to online safety and mobile phone use. For full details about our school/college's policies in these areas please check their individual websites.

8.1 Mobile phone policy

Within school/college our default position is that a young person will not have access to mobile phones throughout the school/college day, including lessons, movement between lessons, breaktimes and lunchtime. Any justifiable exceptions are risk assessed and set out in the school's/college's Mobile Phone Policy which is available on each school's website.

8.2 Artificial intelligence (AI)

Our school/college has regard to DfE guidance on generative artificial intelligence in education and the DfE's published generative AI product safety expectations. Any teacher-facing or pupil-facing use is risk assessed for safeguarding, ethics, data protection, intellectual property, age-appropriateness, accuracy and bias. Filtering and monitoring arrangements apply to generative AI use.

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, young people and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Our School/College recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard young people. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose young person to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to access harmful content or to bully young person in line with this policy and our anti-bullying policy.

Where nudes or semi-nudes have been digitally altered or wholly generated using AI, the school/college will follow UKCIS guidance on making or sharing nudes and semi-nudes and will treat every incident as requiring a safeguarding response.

9. Notifying parents or carers

i. Where appropriate, we will discuss any concerns about a child or young person with their parents or carers. The DSL/DDSL will normally do this in the event of a suspicion or disclosure.

ii. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL/DDSL.

iii. If we believe that notifying the parents or carers would increase the risk to the child or young person, we will discuss this with the local authority children's social care team before doing so.

iv. In the case of allegations of abuse made against other children or young people, we will normally notify the parents or carers of all the children or young people involved. We will think carefully about what information we provide about the other child or young person involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

v. The DSL/DDSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

    a. Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.

    b. Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

10. Young person with special educational needs, disabilities or health issues

Children with SEND or certain medical or physical health conditions may face additional risks because they may not understand that what is happening is abuse; may require intimate care; may be isolated from others; or may be more dependent on adults for care. The school/college will ensure appropriate communication support is in place and will not attribute indicators to a child's condition without further exploration.

i. We recognise that young people with SEND or certain health conditions can face additional safeguarding challenges, and are more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

    a. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.

    b. Young people being more prone to peer group isolation or bullying (including prejudice-based bullying) than other young person.

    c. The potential for young people with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.

    d. Communication barriers and difficulties in managing or reporting these challenges.

    e. Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools/colleges or the consequences of doing so.

ii. We offer extra pastoral support for these young people, as outlined in our SEND Policy *(these are available on individual school websites)*

iii. Any abuse involving young people with SEND will require close liaison with the DSL (or deputy) and the SENDCO.

10.1 Safeguarding children with medical conditions

An incident involving the management of a medical condition, including an allergy, does not automatically require a safeguarding referral. A referral will be considered where the incident indicates increased risk of neglect, abuse or exploitation, for example where essential medical information is withheld or a child is repeatedly sent to school/college without essential medication, placing them at risk. The school/college will follow statutory guidance on supporting pupils with medical conditions and allergy safety.

11. Young person with a social worker

i. Young people may need a social worker due to safeguarding or welfare needs. Children may need this help due to either abuse, neglect, exploitation and/or complex family circumstances. We recognise that a child or young person's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

ii. The DSL/DDSL and all members of staff will work with and support social workers to help protect vulnerable children and young people.

iii. Where we are aware that a young person has a social worker, the DSL/DDSL will always consider this fact to ensure any decisions are made in the best interests of the young person's safety, welfare and educational outcomes. For example, it will inform decisions about:

   a. Responding to unauthorised absence or missing education where there are known safeguarding risks.

   b. The provision of pastoral and/or academic support.

12. Looked-after and previously looked-after children

i. We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

   a. Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

   b. The DSL/DDSL has details of children's social workers and relevant virtual school heads.

ii. Schools/Colleges have appointed a designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

iii. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

iv. As part of their role, the designated teacher will:

   a. Work closely with the DSL/DDSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

   b. Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

13. Young carers

The school/college will be alert to the needs of young carers and recognise the potential effect of caring responsibilities on attendance, attainment, behaviour and wellbeing. We will identify young carers early and coordinate timely internal and external support, including from local authority and health services where appropriate.

14. Children who are lesbian, gay or bisexual, and children who are questioning their gender

Being lesbian, gay or bisexual is not itself a risk factor for harm. However, children who are, or are perceived by others to be, lesbian, gay or bisexual may be vulnerable to discriminatory bullying. The school/college will take a strong, proactive approach to preventing and responding to all such bullying, including applying appropriate sanctions.

Children who are questioning their gender: the school/college will not initiate action relating to social transition. It will respond only where a child or parent/carer raises a request for support. Staff will take time to understand the child's thoughts and feelings, exercise appropriate professional curiosity about the full range of the child's experiences, remain alert to wider vulnerabilities including bullying, family or peer relationships, mental health and psychosocial needs, health issues or neurodiversity, and avoid rigid rules based on gender stereotypes.

No member of staff will adopt a change relating to social transition unless a decision has been made by the school/college following careful individual consideration and the child's parents or carers have been involved, except in the rare circumstances where involving them would create a greater safeguarding risk. The decision-making process will consider the child's age and maturity, wishes and best interests; safeguarding and wider needs; the views of parents/carers; any available clinical evidence or advice; relevant non-clinical professional advice, including from the DSL and SENCO where appropriate; the effect on other children; and duties under the Equality Act 2010 and Human Rights Act 1998.

Parents and carers have the leading role and will be engaged as a priority. Their views will carry great weight and be properly considered. Where a child confides feelings but does not request changes, confidentiality will not be broken unless the conversation raises a related concern about the child's wellbeing or safety, in which case normal safeguarding procedures will be followed.

The school/college recognises social transition as an active intervention and will take a very careful approach. Primary schools will exercise particular caution. Any agreed arrangement will be recorded clearly, communicated only to those who need to know, kept under regular review and adjusted where necessary in the child's and other children's best interests.

The rules in section 4.1 above on sport, toilets, changing rooms, showers and boarding or residential accommodation will be followed. Children will not be permitted to use facilities, accommodation or safety-based single-sex sport designated for the opposite biological sex. Where appropriate, safe and dignified alternative arrangements may be considered without compromising single-sex provision, safety, fairness, comfort, privacy or dignity.

15. Alternative provision

Where the school/college commissions alternative provision, it remains responsible for safeguarding the young person. It will complete due diligence, obtain written confirmation of appropriate safeguarding checks, require the provider to notify it of staff changes or any arrangements that may place the child at risk, and maintain accurate records of the address of the principal provider, any subcontracted provision and every satellite site the pupil may attend. The school will review attendance, safety, suitability and whether the placement continues to meet the pupil's needs at least half-termly. Any safeguarding concern will trigger an immediate review and, where necessary, suspension or termination of the placement unless or until the concern has been satisfactorily addressed.

The school will have regard to DfE alternative provision guidance and voluntary national standards, but will not rely solely on any local register or approval process.

16. Restrictive interventions and reasonable force (schools only)

Staff may use reasonable force only where lawful and necessary, using no more force than is necessary for the least amount of time. The decision is based on professional judgement and individual circumstances. The school will not adopt a "no contact" policy that prevents staff from safeguarding pupils. For pupils with SEND, mental health needs or medical conditions, staff will consider additional vulnerability, reasonable adjustments and proactive individual support plans in line with DfE restrictive-intervention guidance.

17. Complaints and concerns about school/college safeguarding policies

17.1 Complaints against staff

Complaints against staff, including supply teachers, trainee teachers, volunteers and contractors 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, including supply teachers, trainee teachers, volunteers and contractors (see Appendix 2).

17.2 Other complaints

All other complaints to the school/college are handled in accordance with our Complaints Procedures (Aequalis Education Trust - Policies)

17.3 Whistle-blowing

Our Whistleblowing Policy (Aequalis Education Trust - Policies)

covers concerns regarding the way the Trust safeguards young person – including poor or unsafe practice, or potential failures and outlines:

13. Which areas of malpractice or wrongdoing are covered.
14. The options available for reporting a concern, including who to approach within the Trust and externally.
15. How the Trust will respond to such concerns.
16. What protection is available to staff who report another member of staff.

18. Record-keeping

i. We will hold records in line with our records retention schedule.

ii. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL/DDSL.

iii. Records will include:

   a. A clear and comprehensive summary of the concern.

   b. Details of how the concern was followed up and resolved.

   c. A note of any action taken, decisions reached and the outcome.

iv. Concerns and referrals will be kept in a separate child protection file for each child or young person.

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

vi. Where appropriate, Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school/college (until at least the child's 25th birthday), in accordance with the Data Retention Policy and KCSIE.

vii. If a child for whom the school/college has, or has had, safeguarding concerns moves to another school/college, the DSL/DDSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

viii. To allow the new school/college to have support in place when the child arrives, this should be within:

a. **5 days** for an in-year transfer, or within

b. **The first 5 days** of the start of a new term

ix. Where information indicates a risk to the child or to others, including previous carrying, threatening with or use of a knife or weapon, the receiving setting will assess risk and put a safety and support plan in place. Wherever practicable, DSLs will discuss the transfer directly.

x. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL/DDSL will speak to the DSL/DDSL of the receiving school/college and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child or young person.

xi. All Records are stored electronically and are stored securely and confidentially via CPOMS. Only the DSL and DDSLs have access to the Child Protection records and access is secured through two-factor authentication.

xii. The school/college shares information with other agencies when appropriate, in line with Worcestershire Safeguarding Children Partnership's safeguarding procedures.

In addition Appendix 2 sets out our policy on record-keeping with respect to safeguarding concerns or allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors.

19. Training

19.1 All staff:

Safeguarding and child protection training will be based on the requirements and expectations of the current version of Keeping Children Safe in Education, relevant statutory guidance, local safeguarding-partner arrangements and the Trust's safeguarding context. Training will equip staff to understand and discharge their responsibilities, recognise and respond to emerging and established safeguarding risks, and apply the Trust's policies and procedures effectively in practice.

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the Trust or School/College's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

a. This training will be regularly updated and will:

b. Be integrated, aligned and considered as part of the whole Trust safeguarding approach and wider staff training, and curriculum planning.

c. Be in line with advice from the 3 safeguarding partners.

d. Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.

e. Have regard to the Teachers' Standards to support the expectation that all teachers:

1. Manage behaviour effectively to ensure a good and safe environment.

2. Have a clear understanding of the needs of all young person.

ii. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism and to challenge extremist ideas.

iii. Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

iv. Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

v. Volunteers will receive appropriate training, if applicable.

19.2 The DSL and DDSLs:

i. The DSL and DDSLs will undertake child protection and safeguarding training at least every 2 years.

ii. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs/DDSLs, or taking time to read and digest safeguarding developments).

iii. They will also undertake Prevent awareness training.

19.3 Governors and Trustees:

i. All Governors and Trustees receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

a. Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.

b. Can be assured that safeguarding policies and procedures are effective and support the school/college to deliver a robust whole-school/college approach to safeguarding.

ii. As the Chair of Governors/Trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher/Executive Leadership Team, they receive training in managing allegations for this purpose.

19.4 Recruitment – interview panels:

At least one person conducting any interview for any post at the Trust will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. This section addresses only the training requirement for interview panels. The Trust's detailed safer recruitment, pre-appointment vetting, regulated activity, single central record and statutory referral arrangements are set out in our Recruitment and Selection Policy. (Aequalis Education Trust - Policies)

20. Monitoring arrangements

This policy will be reviewed by the ST and ESL at least annually and whenever changes in legislation, statutory guidance, local safeguarding arrangements, emerging risks or lessons learned require it. The Governing Body will evaluate and approve the policy and hold leaders to account for its effective implementation.

21. Links with other policies

This policy links to the following policies and procedures:

- Artificial Intelligence
- Behaviour
- Staff Code of Conduct
- Safer Recruitment and Selection
- Whistleblowing
- Anti-Bullying
- Complaints
- Health and safety
- Attendance
- Online safety
- Use of Technology
- Equality
- Relationships and Sex Education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Mobile Phone Policy

Appendices

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 exploitation, 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 or young person.

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

Emotional abuse may involve:

i. Conveying to a child or young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

ii. Not giving the child or young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

iii. Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond their developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child or young person participating in normal social interaction.

iv. Seeing or hearing the ill-treatment of another.

v. Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

i. Physical contact, including acts of penetration,whether that is with part of a person's body or an object (for example, rape or assault by penetration) or non-penetrative acts such as masturbation, kissing, rubbing and touching over clothing.

ii. Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or young people to behave in sexually inappropriate ways, or grooming a child or young person in preparation for abuse (including via the internet).

Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit

acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

Neglect is the persistent failure to meet a child or young person's basic physical and/or psychological needs, likely to result in the serious impairment of their 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:

i. Provide adequate food, clothing and shelter (including exclusion from home or abandonment).

ii. Protect a child from physical and emotional harm or danger.

iii. Ensure adequate supervision (including the use of inadequate care-givers).

iv. 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: Allegations against staff (including low-level concerns) policy:

Section 1: Allegations that may meet the harms threshold.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of schools/colleges.

i. If there is any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer or 'LADO' (see contact details in the Key Personnel section above).

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

iii. A 'case manager' will lead any investigation. This will be the Headteacher, or the Chair of Governors/Trustees where the Headteacher/CEO is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

v. If we receive an allegation of an incident happening while an individual or organisation was using the school/college premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

a) Suspension of the accused until the case is resolved:

i. Suspension of the accused 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 there 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.

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

   a. Redeployment within the school/college so that the individual does not have direct contact with the child or children concerned.

   b. Providing an assistant to be present when the individual has contact with children or young people.

c. Redeploying the individual to alternative work in the school/college so that they do not have unsupervised access to children or young people.

d. Moving the child(ren) or young person/people to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.

e. Temporarily redeploying the individual to another role in a different location, for example to an alternative school/college or other work for AET.

iii. If in doubt, the case manager will seek views from the school/college's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

b) 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, or to cause harm to the subject of the allegation
- **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

c) Procedure for dealing with allegations:

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

i. Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.

ii. Discuss the allegation with the designated officer at the local authority. 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 designated officer – 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 designated officer as soon as practicably possible after contacting the police)

iii. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (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.

iv. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school/college is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.

v. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL/DDSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.

vi. **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. 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 one working day, and the individual will be given a named contact at the school/college and their contact details.

vii. **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 designated officer 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.

viii. **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school/college and/or liaise with the police and/or children's social care services as appropriate.

ix. 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 considering what other support is appropriate.

x. 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.

xi. Keep the parents or carers of the child/children or young person/people involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).

xii. 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 or young person.

If the school/college 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.

Where the police are involved, wherever possible the school/college 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 school/college's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff:

i. If there are concerns or an allegation is made against someone not directly employed by the school/college, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures:

   a. We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.

   b. The Governing Body will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school/college, while the school/college carries out the investigation.

   c. We will involve the agency fully, but the school/college will take the lead in collecting the necessary information and providing it to the LADO as required.

   d. We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

ii. When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

d) Timescales:

i. We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

   a. Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.

   b. If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.

   c. If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

ii. However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

e) Specific actions:

i. Action following a criminal investigation or prosecution:

The case manager will discuss with the local authority's designated officer 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.

ii. Conclusion of a case where the allegation is substantiated:

a. If the allegation is substantiated and the individual is dismissed or the school/college ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school/college will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

b. If the individual concerned is a member of teaching staff, the school/college will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

iii. Individuals returning to work after suspension:

a. 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.

b. 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/college.

iv. Unsubstantiated, unfounded, false or malicious reports:

If a report is:

a. Determined to be unsubstantiated, unfounded, false or malicious, the DSL/DDSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.

b. Shown to be deliberately invented, or malicious, the school/college will consider whether any disciplinary action is appropriate against the individual(s) who made it.

v. Unsubstantiated, unfounded, false or malicious allegations:

If an allegation is:

a. Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.

b. Shown to be deliberately invented, or malicious, the school/college will consider whether any disciplinary action is appropriate against the individual(s) who made it.

f) Confidentiality and information sharing:

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

ii. The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

a. Who needs to know about the allegation and what information can be shared.

b. 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.

c. What, if any, information can be reasonably given to the wider community to reduce speculation.

d. How to manage press interest if, and when, it arises.

g) Record-keeping:

i. The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

ii. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

iii. For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

a. A clear and comprehensive summary of the allegation

b. Details of how the allegation was followed up and resolved

c. Notes of any action taken, decisions reached and the outcome

d. A declaration on whether the information will be referred to in any future reference

iv. In these cases, the school/college will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

v. We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

h) References:

When providing employer references, we will:

i. Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.

ii. Include substantiated allegations, provided that the information is factual and does not include opinions.

i) Learning lessons:

i. After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer 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.

ii. This will include consideration of (as applicable):

    a. Issues arising from the decision to suspend the member of staff

    b. The duration of the suspension

    c. Whether or not the suspension was justified

    d. 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.

iii. For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

j) Non-recent allegations:

i. Abuse can be reported, no matter how long ago it happened.

ii. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

iii. Where an adult makes an allegation to the Trust that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold, as set out in Section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the Trust
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

a) Definition of low-level concerns:

i. The term 'low-level' concern is any concern, no matter how small, that an adult working in or on behalf of the Trust may have acted in a way that:

   a. Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

   b. Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

   a. Being overly friendly with children

   b. Having favourites

   c. Taking photographs of children on their mobile phone

   d. Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

   e. Humiliating young person

b) Sharing low-level concerns:

i. We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

ii. We will create this culture by:

   a. Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.

   b. Empowering staff to share any low-level concerns as per section 7.7 of this policy.

   c. Empowering staff to self-refer.

   d. Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.

   e. Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.

   f. Helping to identify any weakness in the Trust's safeguarding system.

iii. Low level concerns should be reported as follows:

   a. These should be reported to the CEO if about a member of the Central Team

c) Responding to low-level concerns:

i. If the concern is raised via a third party, the Headteacher/CEO will collect evidence where necessary by speaking:

a. Directly to the person who raised the concern, unless it has been raised anonymously.

b. To the individual involved and any witnesses.

ii. The Headteacher/CEO will use the information collected to categorise the type of behaviour and determine any further action, in line with the school/college's staff code of conduct. The Headteacher/CEO will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL/DDSL.

iii. Keeping Children Safe in Education also links to this report for more information Developing and implementing a low-level concerns policy: A guide for organisations which work with children]

d) Record keeping:

i. All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

ii. Records will be:

a. Kept confidential, held securely and comply with the DPA 2018 and GDPR UK

b. Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in Section 1 of this appendix, we will refer it to the designated officer at the local authority.

c. Retained at least until the individual leaves employment at the Trust/School/College.

iii. Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

e) References

We will not include low-level concerns in references unless:

i. The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

ii. The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Appendix 3: specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits

- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or

child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child or young person may be absent or become missing from education, but some children and young people are particularly at risk. These include those who:

a. Are at risk of harm or neglect.
b. Are at risk of forced marriage or FGM.
c. Come from Gypsy, Roma, or Traveller families.
d. Come from the families of service personnel.
e. Go missing or run away from home or care.
f. Are supervised by the youth justice system.
g. Cease to attend a school/college.
h. Come from new migrant families.

i. We will follow our procedures as set out in our Attendance Policy (please see individual school websites) for unauthorised absence and for dealing with children who are absent from 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/college without a new school/college 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.

ii. 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 absent, such as travelling to conflict zones, FGM, exploitation and forced marriage.

iii. If a staff member suspects that a child or young person is suffering from harm or neglect, 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 suffering or likely to suffer from harm, or in immediate danger.

Missing young person

i. Our procedures are designed to ensure that a missing child or young person is found and returned to effective supervision as soon as possible. If a child or young person goes missing, we will follow the School/College's safeguarding response for students who go missing from education as set out in our Attendance Policy.

Contextual Safeguarding and Extra-familial harms

We are aware that safeguarding incidents and/or behaviours can be associated with factors outside of a child / young person's family home or outside of school/college and can also occur between children and young people outside of these environments.

All staff, but especially the DSL (and deputy) should consider whether children and young people are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

As part of our whole Trust approach to safeguarding, we take into account the wider context of each young person when dealing with incidents and working with external agencies to secure the best outcome for each child / young person and to safeguard and protect them as effectively as possible.

Child Criminal Exploitation

Child Criminal Exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

a. Appearing with unexplained gifts or new possessions
b. Associating with other young people involved in exploitation
c. Suffering from changes in emotional wellbeing
d. Misusing drugs and alcohol
e. Going missing for periods of time or regularly coming home late
f. Regularly missing school/college or education
g. Not taking part in education

i. If a member of staff suspects CCE, 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.

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 form 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 any type of schools (including special schools), 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 ‘trap house 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.

i. If a member of staff suspects a child or young person is involved in, or vulnerable to / at risk of involvement in County Lines, 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.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

i. If a member of staff suspects CSE, 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.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school/college. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Our Trust has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

a. Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
b. Discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents.
c. Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse').
d. Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
e. Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).
f. Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
g. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

h. Consensual and non-consensual making or sharing of nudes and semi-nudes, including images that are digitally altered or wholly generated using artificial intelligence.

i. Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

j. Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages, the non-consensual making or sharing of nudes or semi-nudes, especially in chat groups; and the sharing of abusive images and pornography with children who do not want to receive such content.

i. If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in Section 7 of this policy, as appropriate. In particular, Sections 7.8 and 7.9 set out more detail about our school/college's approach to this type of abuse.

ii. When considering instances of harmful sexual behaviour between children and young people, we will consider their ages and stages of development. We recognise that children and young people displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include:

a. intimate partner violence,

b. abuse by family members,

c. teenage relationship abuse (abuse in intimate personal relationships between children)

d. and child/adolescent to parent violence and abuse.

e. It can be physical, sexual, financial, psychological or emotional.

f. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

i. If a member of staff suspects Domestic Abuse, they should 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.

ii. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school/college (usually the DSL) before the child(ren) or young person(people) arrive at school/college the following day, as outlined in the Operation Encompass procedures.

iii. The DSL will provide support according to the child/young person's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

i. The DSL/DDSLs will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

ii. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Temporary accommodation notification duty

Where the school/college becomes aware that a child has been placed in temporary accommodation outside the local authority area, it will share relevant safeguarding information promptly and work with the responsible local authorities and other agencies in accordance with the applicable notification duties and local arrangements. Homelessness code of guidance for local authorities - Download this guidance - Guidance - GOV.UK. The DSL will consider the impact of temporary accommodation on attendance, access to services, welfare and safeguarding risk.

Honour or faith-based abuse (including FGM and forced marriage)

Honour or Faith-based abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

i. All forms of HBA are abuse and will be handled and escalated as such.

ii. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it.

iii. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

a) 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 7.3 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:

i. A pupil confiding in a professional that FGM has taken place.

ii. A mother/family member disclosing that FGM has been carried out.

iii. A family/pupil already being known to social services in relation to other safeguarding issues.

iv. A girl:

   a. Having difficulty walking, sitting or standing, or looking uncomfortable.

   b. Finding it hard to sit still for long periods of time (where this was not a problem previously).

   c. Spending longer than normal in the bathroom or toilet due to difficulties urinating.

   d. Having frequent urinary, menstrual or stomach problems.

   e. Avoiding physical exercise or missing PE.

   f. Being repeatedly absent from school/college, or absent for a prolonged period.

   g. Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.

   h. Being reluctant to undergo any medical examinations.

   i. Asking for help, but not being explicit about the problem.

   j. Talking about pain or discomfort between her legs.

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

i. The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

ii. FGM being known to be practised in the girl's community or country of origin

iii. A parent or family member expressing concern that FGM may be carried out

iv. A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

v. A girl:

   a. Having a mother, older sibling or cousin who has undergone FGM
   b. Having limited level of integration within UK society
   c. Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
   d. Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
   e. Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
   f. 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)
   g. Being unexpectedly absent from school/college
   h. 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.

b) 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.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

i. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

ii. If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

iii. The DSL will:

   a. Speak to the pupil about the concerns in a secure and private place.
   b. Activate the local safeguarding procedures and make an immediate referral to local authority children's social care and, where appropriate, the police. They will not approach family or community members where this may increase the risk.
   c. Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fcdo.gov.uk
   d. Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school/college counsellor, as appropriate.

Preventing Radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

i. Schools and colleges have a duty to prevent children from being drawn into terrorism. The DSL and DDSLs will undertake Prevent awareness training and will make sure that staff have access to appropriate training to equip them to identify children at risk.

ii. We will assess the risk of children in our schools/colleges being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

iii. We will ensure that suitable internet filtering is in place, and equip our young person to stay safe online at school/college and at home.

iv. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

v. Staff will be alert to changes in young person' behaviour.

vi. The government website Educate Against Hate and charity NSPCC say that signs that a child or young person is being radicalised can include:

   a. Refusal to engage with, or becoming abusive to, peers who are different from themselves.

   b. Becoming susceptible to conspiracy theories and feelings of persecution.

   c. Changes in friendship groups and appearance.

   d. Rejecting activities they used to enjoy.

   e. Converting to a new religion.

f. Isolating themselves from family and friends.

g. Talking as if from a scripted speech.

h. An unwillingness or inability to discuss their views.

i. A sudden disrespectful attitude towards others.

j. Increased levels of anger.

k. Increased secretiveness, especially around internet use.

l. Expressions of sympathy for extremist ideologies and groups, or justification of their actions.

m. Accessing extremist material online, including on Tik Tok, Facebook, Instagram, Twitter, Threads etc.

n. Possessing extremist literature.

o. Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

vii. Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

viii. If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

ix. Staff should **always** take action if they are worried.

x. Further information on the school/college's measures to prevent radicalisation are set out in other school/college policies and procedures, including the curriculum policy, the Behaviour Policy, the Online Safety Policy, and the Prevent Risk Assessment

Harmful sexual behaviour, sexual harassment and sexual violence between children

Harmful sexual behaviour (HSB) is an umbrella term for sexual behaviours displayed by children and young people that are developmentally inappropriate and may be harmful or abusive. HSB can occur online, face to face or both.

Children's sexual behaviour exists on a continuum from normal and developmentally expected behaviour, through inappropriate and problematic behaviour, to abusive and violent behaviour. The position of behaviour on the continuum must be assessed in the context of the child's age and developmental stage, the nature and frequency of the behaviour, any difference in age, power or developmental ability, coercion, intimidation and consent.

Sexual harassment and sexual violence may form part of this continuum and may overlap. They can occur between children of any age or sex; through a group of children targeting an individual or group; and online, face to face or concurrently online and offline.

Behaviour between children of significantly different ages or developmental stages is particularly concerning. HSB may indicate that the child displaying it has experienced abuse, trauma, unmet

needs or exposure to abusive practices or material. The response will therefore safeguard the victim and wider young person body while also assessing and supporting the child displaying the behaviour.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school/college.

i. If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

ii. When supporting victims, staff will:

    a. Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.

    b. Regularly review decisions and actions, and update policies with lessons learnt.

    c. Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.

    d. Consider if there are wider cultural issues within the school/college that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.

    e. Remain alert to the possible challenges of detecting signs that a child or young person has experienced sexual violence, and show sensitivity to their needs.

iii. Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and children who are questioning their gender are at greater risk

iv. Staff should be aware of the importance of:

    a. Challenging inappropriate behaviours.

    b. Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

    c. Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

v. If staff have any concerns about sexual violence or sexual harassment, or a child or young person makes a report to them, they will follow the procedures set out in Section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school/college's approach to this type of abuse.

Safeguarding and supporting children who display HSB

vi. The school/college will balance the need to safeguard the victim and the wider young person body with the need to provide the child displaying HSB with education, safeguarding

support and proportionate disciplinary consequences. These actions are not mutually exclusive.

vii. The response will consider age and developmental stage, the nature and frequency of the behaviour, proportionality, risk to others and any unmet needs. HSB in younger children may be a sign of their own abuse, trauma or exposure to abusive practices or materials. Advice will be sought as appropriate from children's social care, the police and specialist HSB or sexual violence services.

viii. Support will address underlying trauma or unmet needs, aim to prevent repetition or escalation, and be reflected in an individual safety and support plan. Any exclusion decision will be lawful, reasonable and fair.

Serious violence

Indicators which may signal that a child or young person is at risk from, or involved with, serious violent crime may include:

- Increased absence from school/college.
- Change in friendships or relationships with older individuals or groups.
- Significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.
- Unexplained gifts or new possessions (this could indicate that the child or young person has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

Risk factors which increase the likelihood of involvement in serious violence include:

a. Being male.

b. Having been frequently absent or permanently excluded from school/college.

c. Having experienced child maltreatment.

d. Having been involved in offending, such as theft or robbery.

ii. Staff will be aware of these indicators and risk factors.

› If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

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. This can include a parent, other family members, someone not related to the child / young person, or by a stranger.

Further information is available at: www.actionagainstabduction.org

When we consider who is abducted and who abducts:

- Nearly three-quarters of children abducted abroad by a parent are aged between 0 and 6years-old
- Roughly equal numbers are boys and girls
- Two-thirds of children are from minority ethnic groups.
- 70% of abductors are mothers. The vast majority have primary care or joint primary care for the child abducted.
- Many abductions occur during school holidays when a student is not returned following a visit to the parent's home country (so-called 'wrongful retentions').

Other community safety incident could include people loitering, unknown adults engaging children in conversation, adults taking photos of children or young people, or a violent incident occurring in the neighbourhood.

i. Any concerns that a child may have been abducted, or around a community safety incident need to be reported to the DSL immediately.

ii. The DSL will respond to the concern in accordance with the above policy and the Local Safeguarding procedures, depending on the nature of each concern. If we become aware of an abduction, we will follow the WSCP procedure and contact the police and children's social care. If we are made aware of a potential risk of abduction, we will seek advice and support from police and children's social care to confirm that they are aware and seek clarity on what actions we are able to take.

iii. From a preventative perspective it is important our young people are given practical advice on how to keep themselves safe. We provide content within the curriculum which focus on building both confidence and safeguarding knowledge as well as opportunities for children and young people to report their concerns.

Modern Slavery

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. Any child transported for exploitative reasons is considered to be a trafficking victim.

When considering modern slavery, there is a perception that this is taking place overseas. The government estimates that tens of thousands of slaves are in the UK today. Young people being forced to work in restaurants, nail bars, car washes and harvesting fruit, vegetables or other foods may have all been slaves 'hiding in plain sight' within the U.K and rescued from slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been rescued within the UK.

There are a number of indicators which suggest that a student may have been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as follows:

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Has a history of going missing and unexplained moves
- Is required to earn a minimum amount of money every day
- Works in various locations
- Has limited freedom of movement
- Appears to be missing for periods
- Is known to beg for money
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good
- Is one among a number of unrelated children found at one address
- Has not been registered with or attended a GP practice
- Is excessively afraid of being deported.

For those students who are internally trafficked within the UK indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault)
- Prevalence of a sexually transmitted infection or unwanted pregnancy
- Reports from reliable sources suggesting the likelihood of involvement in
- sexual exploitation/the child has been seen in places known to be used for sexual exploitation
- Evidence of drug, alcohol or substance misuse
- Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
- Relationship with a significantly older partner
- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding
- Persistently missing, staying out overnight or returning late with no plausible explanation
- Returning after having been missing, looking well cared for despite having not been at home
- Having keys to premises other than those known about
- Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity
- Truancy / disengagement with education
- Entering or leaving vehicles driven by unknown adults
- Going missing and being found in areas where the child or young person has no known links; and/or
- Possible inappropriate use of the internet and forming on-line relationships, particularly with adults.

These behaviours themselves do not indicate that a child is being trafficked but should be considered as indicators that this may be the case.

i. If staff believe that a child is being trafficked or is a slave, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.

ii. Where staff have reasonable grounds to suspect that a child may be a victim of trafficking or modern slavery, they must report this immediately to the DSL or a deputy. The DSL will make an

immediate referral to local authority children's social care and, where appropriate, the police. Schools and colleges are not ordinarily authorised First Responder organisations for the National Referral Mechanism; the DSL will therefore work with children's social care, the police or another authorised First Responder to ensure that an NRM referral is considered and made where appropriate.

iii. Staff must not delay action while attempting to determine whether the legal definition of modern slavery is met. The child's immediate safety and welfare, and any need for emergency police action, take priority.

iv. The DSL will record the concern, decisions, referrals and outcomes, and will follow up and escalate in accordance with local safeguarding procedures if an appropriate response is not received.

Children and Young People involved in the Court System and Children with family members in Prison

Children and young people involved in the court system

Children may be required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, and may be involved in private family-law proceedings. The school/college will recognise that court proceedings can create anxiety and additional welfare or safeguarding needs, and will provide or signpost age-appropriate support and explanatory resources.

Children with a parent or family member in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. Children with a parent or family member in prison may experience stigma, isolation, poverty, poor mental health, reduced attendance and increased vulnerability. The school/college will identify and respond to these needs, work with relevant agencies and signpost appropriate support, including resources from the National Information Centre on Children of Offenders where appropriate.

i. All information relating to young people being involved in the Court system or with family members in prison, should be reported to the DSL/DDSL. We will not only signpost the above guidance, where appropriate, to both the young people and parents and carers, but will also provide additional pastoral and wellbeing support to those young people and work with additional agencies where necessary.

Cybercrime

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. Offences under the Computer Misuse Act 1990 include unauthorised access to computer material, unauthorised access with intent to commit further offences, and unauthorised acts intended to impair the operation of a computer.

Indicators may include a child using unfamiliar coding tools, discussing hacking or denial-of-service attacks, accessing networks or accounts without permission, or being recruited through online forums. Such behaviour may expose the child to exploitation, criminalisation and contact with organised or hostile actors.

Staff will report concerns to the DSL. The DSL will consider safeguarding needs and, where appropriate, seek advice or make a referral to children's social care, the police or the National Crime Agency's Cyber Choices programme in accordance with local arrangements.

Checking the identity and suitability of visitors

There will be school specific arrangements in place for this, see individual school policies for this information.

Appendix 4 – Safer Recruitment Policy

1	**Recruitment and Selection Process** The recruitment steps outlined below are based on Part 3, Keeping Children Safe in Education (KCSIE) 2026. The Early Years Foundation Stage statutory framework contains its own requirements for safer recruitment. To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.
1.1	**Advertising** When advertising roles, we will make clear: • Our Trust's commitment to safeguarding and promoting the welfare of children. • That safeguarding checks will be undertaken. • The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children. • Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.
1.2	**Application Forms** Our application forms will: • Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity). • Include a copy of, or link to, our child protection and safeguarding policy and employment of ex-offenders.
1.3	**Shortlisting** Our shortlisting process will involve at least 2 people and will: • Consider any inconsistencies and look for gaps in employment and reasons given for them. • Explore all potential concerns. Once we have shortlisted candidates, we will ask shortlisted candidates to: • Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes: hey have a criminal history

	hether they are included on the barred list hether they are prohibited from teaching ormation about any criminal offences committed in any country in line with the law as blicable in England and Wales y relevant overseas information hey are known to the policy and children's local authority social care and hey have been disqualified from providing childcare • Sign a declaration confirming the information they have provided is true. We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.
1.4	**Seeking References and Checking Employment History** We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview. When seeking references we will: • Not accept open references (for example, "To whom it may concern"). • Not rely on applicants to obtain their reference. • Not accept references from a family member. • Liaise directly with referees and verify any information contained within references with the referees. • Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations. • Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed. • Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. If the applicant has never worked with children, then ensure a reference is from their current employer training provider or education setting (EYFS). • Ensure electronic references originate from a legitimate source. • Contact referees to clarify where information is vague or insufficient information is provided. • Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed. • Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate. • Resolve any concerns before any appointment is confirmed.
1.5	**Interview and Selection** When interviewing candidates, we will: • Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this.

- Explore any potential areas of concern to determine the candidate's suitability to work with children.
- Record all information considered and decisions made.

2 **Pre-Appointment Vetting Checks**

We will record all information on the checks carried out in the Trust / school's single central record (SCR). Copies of these 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.

2.1 **New Staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check:

o For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available

o Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school

- 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 be a teacher.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

all staff, including teaching positions: criminal records checks for overseas applicants

teaching positions: obtain a letter from the professional regulating authority in the country ere the applicant has worked, confirming that they have not imposed any sanctions or trictions on that person, and/or are aware of any reason why that person may be unsuitable teach

- 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.

**Management positions are most likely to include, but are not limited to, Executive Team members, Central staff leaders, headteachers, principals and deputy/assistant headteachers.*

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations

and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or
- Engaging in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

The above applies to both paid staff and volunteers.

2.2 Existing Staff and Volunteers

In certain circumstances we will carry out all the relevant checks on existing staff or volunteers as if the individual was a new member of staff or a new volunteer. These circumstances are when:

- There are concerns about an existing member of staff's or the volunteer's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

This duty applies equally to paid staff and volunteers where they were engaged in regulated activity.

2.3 Agency and Third-Party Staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

2.4 Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). 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, or request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school.
We will not keep copies of such checks for longer than 6 months.

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.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

2.5 **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 individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

2.6 **Volunteers**

We will:

- Never allow an unchecked volunteer to work in regulated activity, or leave them unsupervised.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.
- Obtain references for volunteers before they are recruited.
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

2.7 **Governors and Members**

All trustees, local governors and members 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 will have their DBS check countersigned by the secretary of state. All proprietors, trustees, local governors and members will also have the following checks: · A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.] · Identity · Right to work in the UK · Other checks deemed necessary if they have lived or worked outside the UK
2.8	**Staff Working in Alternative Provision Settings** Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.
2.9	**Adults who Supervise Pupils on Work Experience** When organising work experience, we will ensure that policies and procedures are in place to protect children from harm. We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.
2.10	**Pupils Staying with Host Families** Where the 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. Where the 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.