# MAT Child Protection and Safeguarding Policy (from 1 September 2026)

Date policy last reviewed: July 2026

Signed by:

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|  | Designated safeguarding trustee | Date: | 17th August 2026 |
|  | Chair of trustees | Date: | 17th August 2026 |

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## Statement of intent

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

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

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

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

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

## DSLs and DDSLs within the trust

| Name of school | Name of DSL | Name of DDSL(s) |
|---|---|---|
| Belvedere Infant School<br>Belvedere Junior School | Sam Salter | Lou Lynch<br>Gary Powell<br>Rebecca Umney<br>Debbie West<br>Annmarie Tampling<br>Theresa Coller |
| Broadmead Primary School | Kelly Knight | Gail Clarke<br>Sarah Hunter<br>Amanda Lewin |

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| Burnt Oak Junior School | Kimberley Snow | Vicky Harbor<br>Lizzie Buckley<br>Georgia Carr |
| Chatsworth Infant School | Cathy Kinsley | Hayley Turner<br>Vicky Harbor<br>Mel Skinner |
| Churchwood Primary School | Jo Bodiam | Rob Smith<br>Anne Jones<br>Natalie Pitts |
| Coombe Road Primary School | Stuart Scrase | Clare Warland<br>Clare Burcombe |
| Downe Primary School | Joanna Quinn | Elliott Knight<br>Rebecca Pizer<br>Matt Ferguson |
| Edenbridge Primary School | Michelle Debono | Charlotte Lowe<br>Heather Hepworth<br>Ellie Hover<br>Lynn King<br>Sharron Medhurst |
| Halstead Community Primary School | Liam Frost | Matt Ferguson<br>Matt Pemberton |
| Holland Junior School | Deniece Graham | Melanie Brown<br>Stacey Gilfrin<br>Paul Arnold |
| Hollington Primary School | Max Vigor | Grace McDougall<br>Rebecca Beeching<br>Sharon Hughes<br>Laura Bolton |
| Ightham Primary School | Sue Earl | Ian McManus<br>Ruth Johnson |
| Moulsecoomb Primary School | Lucy Dean | Lynn Tiltman<br>Karen Taylor |
| Red Hill Primary School | Tanyel Hill | Becci McManus<br>Emma Nolan<br>Katie Melvin<br>Kirsty Long<br>Fiona Marshall<br>Sorcha Black |
| Robsack Wood Primary School | A Read | Caroline Thayre<br>Tana Isted<br>Cassie Simpson<br>Amanda Neill<br>Alice Prince |

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| Shoreham Village School | Nikola Sheraton | Rebecca Bass<br>Krista Welham |
| Southborough Primary School | Melody Berthoud | Gill Hawkins<br>Ian Fotheringham<br>Enoka Abey<br>Sonia Ahmet<br>Claire Davies |
| South Norwood Primary School | James Looker | Stef Maher<br>Kam Marshall<br>Katy Norman<br>Siven Mehmet |
| Stewart Fleming Primary School | Rachel Lincoln | Lydia Coss<br>Lara Wilson<br>Amanda Britton-Chambers<br>Giles Dutton |
| The Crescent Primary School | Rennaysha Gray | Verity Denman<br>Emma Crane |
| West Blatchington Primary & Nursery School | Natalie Bellis | Russell Brentnall<br>Rob Fisher<br>Lis Marxen |
| Woodcote Primary School | Jo Hannan | Liv Carr<br>Amy Daniels<br>Jo Bull<br>Kim Springall<br>Louise Jeffers<br>Sally Mott |

## Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

| Acronym | Long form | Description |
|---|---|---|
| AI | Artificial intelligence | Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images. |
| CCE | Child criminal exploitation | A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. |
| CSCS | Children's Social Care Services | The branch of the local authority that deals with children's social care. |

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| CSE | Child Sexual Exploitation | A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. |
| DBS | Disclosure and Barring Service | The service that performs the statutory check of criminal records for anyone working or volunteering in a school. |
| DfE | Department for Education | The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England. |
| DPO | Data Protection Officer | The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act 2018. |
| DSL | Designated Safeguarding Lead | A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school. |
| EEA | European Economic Area | The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland). |
| EHC plan | Education, Health and Care Plan | A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil. |
| FGM | Female Genital Mutilation | All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. |
| UK GDPR | The UK General Data Protection Regulation | Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent. |
| HBA | 'Honour-based' Abuse | So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community. |
| HMCTS | HM Courts and Tribunals Service | HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice. |

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

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| VSH | Virtual School Head | Virtual school heads oversee promoting the educational achievement of all the children looked after by the LA they work for, and all children who currently have, or previously had, a social worker. |

## Definitions

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

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

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

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

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

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

For the purposes of this policy, **"sexual harassment"** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that

normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
    - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
    - Sharing unwanted explicit content.
    - Upskirting.
    - Sexualised online bullying.
    - Unwanted sexual comments and messages, including on social media.
    - Sexual exploitation, coercion, and threats.

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

For the purposes of this policy, the **"consensual and non-consensual sharing of nude and semi-nude images and/or videos"**, colloquially known as **"sexting"**, and collectively called **"youth-produced sexual imagery"** is defined as the creation of sexually explicit content by a person under the age of 18 that is shared with another person under the age of 18. This definition does not cover persons under the age of 18 sharing adult pornography or exchanging messages that do not contain sexual images.

"**Deep fakes**" and "**deep nudes**" refer to digitally manipulated and AI-generated nudes and semi-nudes.

For the purposes of this policy, **"indecent imagery"** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

Indecent images also include indecent **"pseudo-images,"** which are images that have been created or manipulated using computer software and/or AI.

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include

ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

For the purposes of this policy, **"emotional abuse"** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the policy and procedures for dealing with it.

For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical

and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Legal framework

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

**Legislation**

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Education Act 2002

**Statutory guidance**

- DfE (2026) 'Keeping children safe in education 2026'
- DfE (2026) 'Working Together to Safeguard Children 2026'
- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2025) 'Academy trust handbook 2025'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2025) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2022) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- DfE (2026) 'Working together to improve school attendance'

**Non-statutory guidance**

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2024) 'Information sharing'

- DfE (2025) 'Academy trusts: governance guide'
- DfE (2017) 'Child sexual exploitation: definition and guide for practitioners'
- DfE (2026) 'Recruit teachers from overseas'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2025) 'Meeting digital and technology standards in schools and colleges'
- DfE (2025) 'Filtering and monitoring standards for schools and colleges'
- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'

**Policies and documents**

This policy operates in conjunction with the following school-level and trust-wide policies:

- Allegations of Abuse Against Staff Policy
- Behaviour (including Anti-Bullying) Policy
- Child Missing Education Policy
- Child on Child Abuse Policy and Procedures
- Cyber-security Policy
- GDPR and Data Protection Policy
- Mental Health and Emotional Wellbeing Policy
- Mobile Phone Policy
- Online Safety Policy
- Photography and Images Policy
- Physical Restraint and Restrictive Intervention Policy
- Records Management Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Staff Disqualification Declaration Form
- Suspension and Permanent Exclusion Policy
- Whistleblowing Policy

## Roles and responsibilities

The board of trustees is responsible for:

- Carrying out their functions to safeguard and promote the welfare of children in all schools within the MAT.
- Understanding their safeguarding duties and having regard to any statutory guidance on safeguarding issued by the Secretary of State.
- Taking strategic leadership responsibility for the trust's safeguarding arrangements.
- Ensuring the suitability of staff, supply staff, volunteers, contractors, governors and proprietors.
- Making sure that all schools within the trust have effective safeguarding policies, procedures and training in place that comply with their statutory obligations.
- Ensuring that the policies and procedures adopted by School Boards, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.

- Having procedures in place to monitor the implementation of safeguarding policies and procedures regularly.
- Ensuring that all governors and trustees receive appropriate safeguarding and child protection training at induction, and that this training is updated regularly thereafter.
- Commissioning safeguarding audits of each school on a regular rotational basis.
- Receiving regular reports from the CEO on safeguarding to the board of trustees delegating operational responsibilities.
- Ensuring that every school within the trust complies with its duties under the above child protection and safeguarding legislation.
- Facilitating training opportunities trust-wide to ensure consistency in the level of training and expertise in safeguarding across the trust's schools.
- Guaranteeing that each school within the trust contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirming that the trust's safeguarding arrangements take into account the procedures and practices of the relevant LAs as part of the inter-agency safeguarding procedures.
- Understanding the local criteria for action and the local protocol for assessment for each school within the trust and ensuring these are reflected in the trust's policies and procedures.
- Complying with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensuring that all staff in schools who are working directly with children and those who do not work directly with children read at least part one of KCSIE.
- Ensuring that mechanisms are in place to assist staff in schools to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensuring schools within the trust appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Ensuring schools within the trust appoint one or more DDSLs to provide support to the DSL and ensuring that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Ensuring each school within the trust facilitates a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern within a school that is part of the trust, ensuring there are procedures in place to take the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensuring systems are in place within the trust for pupils to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensuring that procedures are in place within the trust so that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensuring that a member of the School Board for each school within the trust is nominated to monitor safeguarding and child protection, and to liaise with the school's LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.

- Ensuring all relevant persons are aware of the trust's safeguarding arrangements, including the board of trustees itself, and each school's DSL, DDSL(s) and SLT.
- Making sure that pupils in each school are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhering to statutory responsibilities by ensuring pre-employment checks are conducted on all staff within the trust who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensuring that staff within the trust are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensuring each school within the trust has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Ensuring that volunteers are appropriately risk assessed, receive suitable safeguarding information and induction, are subject to DBS checks where required by law or the Trust's risk assessment, and are appropriately supervised while undertaking their duties.
- Making sure that at least one person on any appointment panel within the trust has undertaken safer recruitment training.
- Ensuring that all staff within the trust receive safeguarding and child protection training updates, at least annually.
- Ensuring each school within the trust takes overall strategic responsibility for filtering and monitoring and seek assurance that the filtering and monitoring standards for schools are being met
- Certifying that there are procedures in place within the trust to handle allegations against staff, supply staff, volunteers and contractors.
- Confirming that there are procedures in place within the trust to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guaranteeing that there are procedures in place within the trust to handle pupils' allegations against other pupils.
- Ensuring that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff within the trust.
- Ensuring that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child and teenage relationship abuse within the trust.
- Guaranteeing that there are systems in place for pupils to express their views and give feedback within the schools.
- Establishing an early help procedure and ensure all staff within the trust understand the procedure and their role in it.
- Appointing a designated teacher for LAC within each school to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensuring that the designated teacher for LAC within each school works with the virtual school head(s) (VSH) to discuss how the pupil premium funding can best be used to support LAC.

- Introducing mechanisms to assist staff within the trust in understanding and discharging their roles and responsibilities.
- Making sure that staff members within the trust have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Putting in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensuring the trust has put in place appropriate safeguarding responses for pupils who go missing from a school within the trust, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and preventing the risk of their disappearance in future.
- Ensuring that all members of the board of trustees have been subject to an enhanced DBS check.
- Creating a culture within the trust where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring that robust safeguarding records are kept in each school and the effectiveness of recordkeeping is monitored.
- Acting in accordance with their obligations under the Human Rights Act 1998 the Equality Act 2010, and the trust's local multi-agency safeguarding arrangements.
- Ensuring each school within the trust has appropriate arrangements are in place to keep children safe where school facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks.
- Ensuring each school within the trust has safeguarding requirements that are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.
- Ensuring each school within the trust has robust health and safety and emergency evacuation procedures.

At each school within the trust, DSLs have a duty to:

- Take lead responsibility for safeguarding and child protection within their school, including online safety.
- Report on an agreed basis to the board of trustees via the agreed route of communication.
- Refer cases:
    - To CSCS where abuse and neglect are suspected, and support staff who make referrals CSCS.
    - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
    - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
    - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Ensure each member of staff within their school has access to and understands the trust-wide and individual school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.

- Ensure continuity of safeguarding responsibilities, by implementing robust cover arrangements for periods when the designated safeguarding lead is unavailable due to illness, leave, or other circumstances. This could, for example, include a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay
- Work with the board of trustees or delegated authority to ensure their school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Understand the importance of information sharing within the trust, including within school, with the trust's other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Adhere to any other school-level duties outlined in their school's Child Protection and Safeguarding Policy and their job description.
- Adhere to any safeguarding arrangements specified in the trust's funding agreement.
- Keep clear, factual, contemporaneous and secure safeguarding records, accurately documenting concerns, decisions, actions taken (including whether referrals have been made), and distinguishing between observed concerns, professional judgement and historic information.
    - Ensure that current safeguarding concerns are clearly distinguished from historic information and placed in appropriate context where records contain significant historic safeguarding information.
    - Ensure that a structured safeguarding summary accompanies the child protection file identifying current safeguarding concerns, relevant context and ongoing support needs when transferring a file.
    - Seek confirmation that safeguarding information has been received and will support effective transition by ensuring that safeguarding information can be readily reviewed and understood by the receiving setting.
    - Ensure that Safeguarding information will be used to support children's safety, welfare and educational outcomes and will not be used in a manner that disadvantages the child.
    - Contact the previous school if safeguarding records received are unclear.

All teachers within the trust, including headteachers, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards.'
- Report, by law, any instances of FGM to the police.
- Adhere to the guidance that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.

All staff within the trust and its schools have a responsibility to:

- Consider, at all times, what is in the best interests of the pupils in the trust.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide safe environments in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the trust's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and DDSL(s) within the relevant school.

- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL within the relevant school.
- Be aware of and understand the trust's procedure to follow in the event that a pupil confides they are being abused, exploited or neglected.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to their school's DSL or DDSL(s) if they are unsure about how to manage safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.

## Multi-agency working

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

The schools within the trust will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once the trust and its schools are named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. Schools within the trust will act in accordance with the trust's safeguarding arrangements.

The trust will develop trusting relationships between families and agencies to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the schools within the trust will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The trust also recognises the particular importance of inter-agency working in identifying and preventing CSE.

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

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspective to evaluate provision.
- Prioritising and sharing resources depending on pupils' needs.
- Celebrating inclusivity and diversity and challenging discrimination.
- Mutually and constructively challenging other's assumptions in a respectful manner.

## Information sharing

The Trust recognises that effective safeguarding depends on timely, appropriate and proportionate information sharing between professionals, agencies and safeguarding partners. Early information sharing enables concerns to be identified at the earliest opportunity, supports effective Early Help and Family Help, and helps protect children from harm.

All staff understand that information sharing is an essential part of safeguarding and promoting the welfare of children. Information will be shared in accordance with the UK GDPR, the Data Protection Act 2018 and relevant statutory safeguarding guidance. Data protection legislation is not a barrier to sharing information where there is a safeguarding purpose, including where it is necessary to protect a child from harm, promote their welfare, or enable appropriate assessment and intervention.

Staff understand that they do not need consent to share information where there is a lawful basis to do so for safeguarding purposes. Concerns that a child may be at risk of harm must be shared promptly with the Designated Safeguarding Lead (DSL) or a Deputy DSL, and with children's social care, the police or other relevant agencies where appropriate.

When sharing information, staff will ensure that it is:

- necessary;
- proportionate;
- relevant;
- accurate;
- timely; and
- shared securely.

All staff will understand that they must not allow uncertainty about information sharing or concerns about data protection to delay or prevent appropriate safeguarding action, nor assume that another professional will take responsibility. Where there is any doubt about whether information should be shared, staff must seek advice from the DSL or a Deputy DSL. Fears about sharing information must never stand in the way of protecting a child.

The Trust will maintain accurate and secure records of safeguarding concerns, actions taken and decisions relating to information sharing, in accordance with statutory guidance and the Trust's record-keeping procedures.

## Early Help and Family Help

Early Help means providing support as soon as a concern or need emerges, at any point in a child's life. Effective Early Help can prevent concerns from escalating and supports children and families to achieve positive outcomes.

The Trust recognises the important role that schools play in identifying children and families who may benefit from additional support. Schools within the Trust are committed to ensuring that all pupils receive appropriate support to access education, achieve their potential, remain safe and have their wellbeing promoted.

Through their daily contact with children and families, school staff are well placed to identify emerging concerns at the earliest opportunity. Staff will remain vigilant to changes in children's behaviour, presentation, attendance, progress, relationships or circumstances that may indicate that a child or family requires additional support.

Early Help includes support provided through universal services, community-based provision and targeted interventions. Where children and families require more coordinated support due to emerging, multiple or complex needs, the Trust will work collaboratively with children, parents/carers and partner agencies, including local authority Family Help services where available, to ensure that appropriate support is provided at the earliest opportunity.

The Trust will work in partnership with safeguarding partners and other agencies to contribute to assessments, plans and interventions designed to support children and families, reduce risk and prevent the escalation of concerns requiring statutory intervention.

Any pupil may benefit from early help, but in particular, staff within the trust will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Are suffering from mental ill health.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised.
- Have family members in custody or is affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a PRU.

The trust will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from early help, for example, if they are:

- Bereaved.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Have recently returned home to their family from care.
- Missing education, or are persistently absent from school, or not in receipt of full-time education.

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

Where early help is deemed appropriate, the DSL in the school will take the lead. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

The board of trustees or delegated authority will collaborate with the relevant LAs and external agencies to engage with the local early help process.

Staff within the trust may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.

## Abuse, neglect and exploitation

The Trust recognises that abuse, neglect and exploitation are forms of harm that can have a significant and lasting impact on a child's physical and emotional wellbeing, development, safety and life chances. All staff working within the Trust and its schools will understand that safeguarding concerns can arise in any environment and context, including within the home, school, community, online, institutional settings and through relationships with family members, peers, professionals, or people who are known or unknown to the child.

All staff will be aware that children may experience harm directly or indirectly. This includes children who may be abused, neglected or exploited themselves, as well as children who are affected by witnessing, hearing, experiencing or being exposed to the effects of abuse or harmful behaviour towards others.

The Trust recognises that abuse and neglect may occur through:

- the deliberate infliction of harm;
- the failure to act to prevent harm;
- the failure to meet a child's basic physical, emotional or developmental needs; or
- behaviour, actions or circumstances that place a child at risk of significant harm.

Harm is not limited to physical injury and may include emotional abuse, psychological harm, coercive and controlling behaviour, exposure to domestic abuse, exploitation, online abuse and other forms of ill treatment.

All staff will be alert to the impact of domestic abuse on children and understand that children may be harmed not only when they are directly involved in incidents, but also when they see, hear or experience the effects of domestic abuse within their environment. The Trust is committed to identifying children affected by domestic abuse and ensuring that appropriate safeguarding action and support are provided.

All staff will understand that abuse, neglect, exploitation and other safeguarding concerns are rarely isolated events. Children may experience multiple and overlapping vulnerabilities and concerns may develop over time. Staff must therefore maintain a professional curiosity, consider the wider context of a child's circumstances, and report any concerns to the Designated Safeguarding Lead (DSL) or Deputy DSL(s), regardless of whether a specific category of abuse has been identified.

The Trust recognises that safeguarding risks may arise within and outside the family environment. Staff, particularly DSLs and Deputy DSLs, will remain alert to the risks of extra-familial harm, including harm arising from peer relationships, exploitation, criminal or sexual exploitation, harmful online interactions, community settings and other environments outside the school.

Staff will understand that children may be vulnerable to exploitation when individuals or groups seek to manipulate, coerce, control or take advantage of them. Exploitation may involve relationships, friendships, online contact, financial gain, status, power, threats or other forms of control. Any concerns that a child may be experiencing exploitation will be shared immediately with the DSL.

All staff will be aware of the signs and indicators of abuse, neglect and exploitation and understand the importance of taking timely action. Staff will follow the Trust safeguarding procedures and report concerns promptly to the DSL or Deputy DSL(s). Where there is uncertainty about whether a concern meets the threshold for referral or further action, staff must seek advice from the DSL.

The Trust recognises that technology is a significant component in many safeguarding and wellbeing issues. Staff will remain alert to online harms, including online abuse, cyberbullying, coercion, exploitation, the sharing of nude or semi-nude images, and technology-enabled harms, including the misuse of artificial intelligence to create harmful or exploitative content.

Staff will understand that safeguarding is everyone's responsibility and that concerns must never be ignored, minimised or delayed. The Trust will ensure that children receive appropriate support, that concerns are recorded accurately, and that information is shared with relevant safeguarding partners when required to protect children from harm.

## Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be made aware of these issues.

Appendix A of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

## Child-on-child abuse (including Harassment, Violence and Harmful Sexual Behaviour)

For the purposes of this policy, child-on-child abuse refers to abuse or harmful behaviour between children. The Trust recognises that children can abuse other children, and that this can take many forms, including bullying, physical abuse, sexual violence, sexual harassment, harmful sexual behaviours, exploitation, online abuse and the sharing of nude and semi-nude images and/or videos. Child-on-child abuse can occur between children of any age, gender or background and may take place within school, outside of school, within the community, through peer relationships or online. All forms of child-on-child abuse, including harassment and violence, are unacceptable and will be taken seriously.

The Trust has a zero-tolerance approach to all forms of abuse, including child-on-child abuse. All schools within the Trust are committed to preventing, identifying, responding to and reducing incidents of child-on-child abuse through effective safeguarding practice, education, early intervention and appropriate support.

All staff will understand that child-on-child abuse can happen between children of any age, gender, background or relationship. It can occur:

- within school;
- outside of school;
- within the community;
- within friendships or intimate relationships;
- through groups or peer networks; and
- online or through technology.

The Trust recognises that child-on-child abuse may be a one-off incident or part of a wider pattern of harmful behaviour. Staff will remain alert to changes in children's behaviour, relationships, emotional wellbeing, attendance, presentation or engagement, recognising that children may not always disclose abuse or identify their experiences as harmful.

All staff will understand that the absence of reported incidents does not mean that child-on-child abuse is not occurring. Staff will maintain professional curiosity and will report concerns promptly to the Designated Safeguarding Lead (DSL) or Deputy DSL(s).

All staff will be aware of the indicators of child-on-child abuse, including how to identify concerns, respond appropriately to disclosures and record and report information in accordance with Trust safeguarding procedures.

Staff will understand the importance of challenging inappropriate, harmful or concerning behaviour between children and will not tolerate behaviours that may normalise abuse, discrimination, harassment, humiliation, intimidation or violence.

**Forms of Child-on-Child Abuse**

Child-on-child abuse can take many forms, including but not limited to:

- **Bullying**, including cyberbullying, prejudice-based bullying and discriminatory bullying.
- **Abuse within intimate personal relationships between peers**, sometimes referred to as teenage relationship abuse.
- **Physical abuse**, including incidents that may be facilitated, encouraged, threatened or recorded through technology.
- **Sexual violence**, including incidents where technology or online platforms are used to facilitate, threaten, encourage or share harmful behaviour.
- **Sexual harassment**, including online sexual harassment, unwanted sexual comments, sexualised behaviour, sharing of sexual content, or behaviour that forms part of a wider pattern of abuse.
- **Causing someone to engage in sexual activity without consent**, including coercion, pressure, manipulation or threats.
- **The consensual and non-consensual sharing of nude and semi-nude images and/or videos**, including the creation, sharing or distribution of such content.
- **AI-generated or digitally manipulated intimate images**, including deepfake or fabricated sexual content created or shared without consent.
- **Upskirting**.
- **Initiation, hazing or initiation-type violence and rituals**, including activities involving humiliation, harassment, abuse, coercion or intimidation, whether occurring in person or online.
- **Exploitation or coercive behaviour between children**, including situations where one child seeks to control, manipulate or benefit from another child.

**Responding to Child-on-Child Abuse**

The Trust recognises that children who experience child-on-child abuse may require immediate safeguarding support. The Trust also recognises that children who display harmful or abusive behaviours may themselves have experienced trauma, abuse, exploitation or other vulnerabilities and may require safeguarding support alongside appropriate intervention.

All concerns will be taken seriously, investigated appropriately and managed in a child-centred way. The DSL will consider:

- the needs and wishes of the child who has experienced harm;
- the safety and wellbeing of all children involved;
- the nature, severity and context of the behaviour;
- whether there are wider safeguarding concerns;
- whether external agency involvement is required.

Where appropriate, schools will work with children, parents/carers and partner agencies to provide support, education, intervention and risk management.

**Vulnerable Children**

The Trust recognises that some children may be at increased risk of experiencing or perpetrating child-on-child abuse. Schools will consider additional safeguarding support for children who may be particularly vulnerable, including (but not limited to):

- children with special educational needs and/or disabilities (SEND);

- children with health conditions or additional vulnerabilities;
- children who are isolated, bullied or socially excluded;
- children who are looked after or have experienced adverse childhood experiences;
- children experiencing disadvantage or family difficulties;
- children vulnerable to discrimination, prejudice or hate-based abuse;
- children who may be vulnerable to exploitation.

Schools will ensure that safeguarding responses are inclusive and consider the individual circumstances of each child.

**Online Child-on-Child Abuse**

The Trust recognises that technology is a significant factor in many safeguarding concerns. Staff will remain alert to online forms of child-on-child abuse, including:

- cyberbullying;
- online harassment;
- coercion and manipulation;
- sexual exploitation;
- sharing of nude and semi-nude images;
- creation or sharing of AI-generated intimate images or deepfake content;
- online grooming and situations where adults may pretend to be children.

DSLs will assess all online safeguarding concerns carefully, including whether an alleged perpetrator is a child or whether an adult is impersonating a child online. Where an adult is involved or suspected to be involved, including through online deception or grooming, the matter will be treated as an adult safeguarding concern and referred to the appropriate agencies.

**Reporting and Pupil Voice**

All pupils will be taught how to recognise unsafe situations, raise concerns and report child-on-child abuse involving themselves or others.

Pupils will be reassured that:

- they will be listened to;
- their concerns will be taken seriously;
- they will receive appropriate support;
- safeguarding action will be taken to help keep them safe.

The Trust recognises the importance of listening to children's voices and ensuring that children feel confident that concerns about peers will be acted upon.

**Related Policies and Procedures**

The Trust's procedures for responding to child-on-child abuse are outlined within the Trust **Child-on-Child Abuse (including harassment and violence) Policy**. Staff will follow this policy alongside relevant procedures within the:

- Behaviour (including Anti-Bullying) Policy;
- Online Safety Policy;

- Relationships, Sex and Health Education Policy; and
- Suspension and Permanent Exclusion Policy.

## Online safety and personal electronic devices

**Online Safety**

The Trust recognises that technology is an integral part of children's lives and that online safety is a fundamental aspect of safeguarding. The Trust understands that online risks can occur both within and outside of school, on school-owned devices, personal devices and through online platforms, applications and communication channels.

All schools within the Trust will ensure that their Online Safety Policy is implemented effectively and reviewed regularly to reflect current safeguarding risks, emerging technologies and the changing online environment.

As part of a broad and balanced curriculum, pupils will receive age-appropriate education to help them understand online risks, make informed choices, develop resilience and know how to seek help when they experience or witness harmful online behaviour.

The Trust recognises that online harms may include, but are not limited to:

- online bullying and harassment;
- sexual harassment and sexual violence facilitated through technology;
- online grooming and exploitation;
- coercion and manipulation;
- sharing of nude and semi-nude images and/or videos;
- creation or sharing of AI-generated or digitally manipulated intimate images, including deepfake content;
- exposure to harmful, inappropriate or illegal content;
- misinformation, disinformation and harmful online communities;
- extremist or radicalising content;
- online fraud, scams and financial exploitation.

**Staff Training and Awareness**

Through safeguarding and online safety training, all staff will understand:

- the risks children may face online;
- behaviours or changes in presentation that may indicate a child is experiencing online harm;
- how online activity may contribute to wider safeguarding concerns, including exploitation, child-on-child abuse, sexual harassment and harmful sexual behaviour;
- the procedures to follow when they have concerns about a pupil's online activity;
- how to report concerns relating to inappropriate online content, communication or behaviour.

Staff will understand that online safeguarding concerns should be treated in the same way as other safeguarding concerns and must be reported promptly to the DSL or Deputy DSL(s).

**Four Categories of Online Risk**

The Trust will ensure that online safety education and staff training address the four categories of online risk identified within KCSIE:

*Content*

Staff and pupils will understand the risks associated with exposure to illegal, inappropriate or harmful material, including but not limited to:

- pornography;
- violent or graphic content;
- racism and hate speech;
- misogyny and harmful gender-based content;
- self-harm and suicide content;
- anti-Semitism;
- extremism and radicalisation;
- misinformation, disinformation and conspiracy theories;
- harmful online communities.

*Contact*

Staff will understand the risks arising from harmful online interactions, including:

- online grooming;
- adults impersonating children or young people;
- sexual, criminal or financial exploitation;
- coercion and manipulation;
- peer pressure and harmful communication between children;
- inappropriate commercial contact and targeted advertising.

*Conduct*

Staff and pupils will understand that online behaviours can contribute to harm, including:

- cyberbullying;
- online harassment;
- sharing of harmful or sexual content;
- creating, sending, receiving or distributing nude and semi-nude images;
- AI-generated or manipulated intimate images;
- online sexual violence or harassment;
- misuse of technology to threaten, intimidate or exploit others.

*Commerce*

Pupils will be taught about risks associated with online financial activity, including:

- online gambling;
- inappropriate advertising;
- scams;
- phishing;
- fraud;
- financial exploitation.

Any concerns relating to financial scams or online exploitation will be reported through appropriate safeguarding channels.

**Filtering and Monitoring**

The Trust will ensure that all schools have appropriate filtering and monitoring systems in place in accordance with current filtering and monitoring standards published by the DfE.

The Trust Board will ensure filtering and monitoring arrangements will be formally reviewed at least annually and following any significant safeguarding incident to ensure they are effective, proportionate and responsive to emerging risks.

All staff will understand:

- the purpose of filtering and monitoring systems;
- their role in reporting concerns;
- how to escalate concerns where inappropriate content has been accessed or where systems may not be effective;
- that filtering and monitoring is a safeguarding responsibility shared by leadership, DSLs, governors/trustees, IT providers and staff.

Staff will receive information about filtering and monitoring arrangements as part of induction and safeguarding updates.

**Communicating with Parents and Carers**

The Trust recognises the important role parents and carers play in keeping children safe online.
Schools will provide parents and carers with information and guidance regarding:

- online risks;
- parental controls and monitoring;
- the platforms, applications and technology children may use;
- how children are expected to use technology for educational purposes;
- how concerns about online safety can be reported.

Schools will ensure parents understand what pupils are being asked to do online as part of their education and how online activity is managed within school.

**Reviewing Online Safety**

All schools within the Trust will review their approach to online safety at least annually, supported by an online safety risk assessment which considers:

- current and emerging online threats;
- pupil experiences and concerns;
- safeguarding incidents;
- filtering and monitoring effectiveness;
- curriculum provision;
- staff and parent awareness.

**Personal Electronic Devices**

The use of personal electronic devices, including mobile phones, smart watches, cameras and recording devices, by staff, pupils, visitors and volunteers will be managed in accordance with the Trust's:

- GDPR and Data Protection Policy;
- Photography and Images Policy;
- Mobile Phones policy.

The Trust recognises that personal electronic devices can present safeguarding risks, including:

- inappropriate recording or sharing of images;
- cyberbullying;
- online harassment;
- sharing of nude and semi-nude images;
- unauthorised communication with pupils;
- breaches of confidentiality.

Staff must report concerns regarding the use of personal electronic devices by pupils, colleagues or other individuals to the DSL in accordance with safeguarding procedures.

**Photography, Images and Recording**

The Trust will ensure that photographs and videos involving pupils are planned appropriately and comply with safeguarding, data protection and consent requirements.

Schools will ensure:

- appropriate consent arrangements are in place;
- images are stored securely;
- images are only used for agreed purposes;
- staff understand expectations regarding personal devices and recording.

Where photographs or videos involve children who are looked after, adopted, subject to special circumstances or where there are identified security concerns, the DSL will consider any additional risks and, where appropriate, liaise with relevant professionals, carers or parents.

**Upskirting**

Upskirting is a criminal offence under the Voyeurism (Offences) Act 2019.

The offence includes operating equipment or enabling equipment to be operated for the purpose of taking an image beneath a person's clothing without consent or knowledge.

The Trust has a zero-tolerance approach to upskirting. Any concerns or incidents will be reported immediately to the DSL, who will determine the appropriate safeguarding response. This may include referral to external agencies, including the police, where appropriate.

## Consensual and non-consensual sharing of Nude and Semi-Nude Images and/or Videos (Including AI-Generated or Manipulated Images)

The Trust recognises that the consensual and non-consensual sharing of nude and semi-nude images and/or videos involving children is a safeguarding concern. This may also be referred to as image-based abuse, youth produced sexual imagery or the sharing of intimate images.

The Trust recognises that children may be harmed through the creation, possession, sharing or distribution of nude and semi-nude images and/or videos, regardless of whether the image was originally created or shared consensually. Children may experience significant emotional distress, bullying, harassment, coercion, exploitation, threats or further abuse following the circulation of intimate images.

The Trust understands that technology continues to evolve and that children may also be vulnerable to the creation, sharing or manipulation of intimate images using artificial intelligence (AI), including digitally altered or deepfake sexual images created without a person's consent.

All schools within the Trust will ensure that staff understand that incidents involving nude and semi-nude images and/or videos must be treated as safeguarding concerns and responded to in accordance with Trust safeguarding procedures.

**Staff Awareness and Training**

All staff will receive appropriate safeguarding training to ensure they understand:

- children's sexual development and age-appropriate sexual behaviour;
- the difference between healthy sexual development and behaviour that is harmful, coercive, abusive or exploitative;
- the risks associated with sharing nude and semi-nude images and/or videos;
- the potential impact on children who are depicted in images, whether the sharing was initially consensual or not;
- the importance of responding sensitively and without blame or judgement;
- when concerns should be escalated to the DSL and when external agencies may need to be involved.

Staff will understand that motivations behind the sharing of images can vary and may include:

- curiosity;
- pressure from peers or intimate partners;
- coercion or manipulation;
- seeking approval or acceptance;
- exploitation;
- malicious sharing;
- bullying or harassment.

The context of each incident must therefore be carefully assessed rather than making assumptions about the behaviour or intentions of those involved.

**Legal Context and Safeguarding Response**

Staff will be aware that creating, possessing or distributing indecent images of children is illegal. However, the Trust recognises that children involved in these incidents may be victims of harm and should not be unnecessarily criminalised.

The primary response will be safeguarding-focused, considering:

- the safety and wellbeing of the child;
- whether coercion, pressure, exploitation or abuse has occurred;
- whether there is a power imbalance between those involved;
- whether the incident forms part of wider child-on-child abuse, sexual harassment or sexual violence;
- whether there is evidence of adult involvement, grooming or exploitation.

The DSL will determine the appropriate safeguarding response, including whether referral to external agencies is required.

**Responding to Reports of Nude and Semi-Nude Image Sharing**

Where a member of staff becomes aware of an incident involving the sharing of nude or semi-nude images and/or videos, they must report this immediately to the school's DSL or Deputy DSL(s).

Where a pupil discloses that an image or video of themselves or another child has been shared, staff will:

- **not view, copy, print, save, store, screenshot, forward or share the image or video;**
- **not ask the pupil to send or show them the image or video;**
- inform the DSL immediately;
- explain to the pupil that the concern must be reported so that appropriate support can be provided;
- listen calmly and respond sensitively;
- avoid blaming, shaming or judging the pupil or others involved;
- reassure the pupil that they will be supported and that safeguarding action will be taken;
- record the concern accurately in accordance with safeguarding recording procedures.

If a member of staff accidentally views an image or video, they must not share or store it and must immediately inform the DSL and seek advice.

**DSL Response and Risk Assessment**

The DSL will assess each incident on an individual basis and consider:

- who is involved and their ages;
- whether the sharing was consensual or non-consensual;
- whether pressure, coercion, threats or manipulation were involved;
- whether the behaviour constitutes child-on-child abuse, sexual harassment or sexual violence;
- whether the child is vulnerable due to additional safeguarding factors;
- whether the image has been shared further or posted online;
- whether an adult or unknown individual is involved;
- whether external agency involvement is required.

Where there is evidence that an adult has created, obtained, shared or attempted to obtain intimate images of a child, including through online deception or grooming, this will be treated as an adult safeguarding concern and referred appropriately.

**Education and Prevention**

The Trust will ensure that pupils receive age-appropriate education through the curriculum to help them understand:

- consent and respectful relationships;
- the risks associated with sharing intimate images;
- online safety and digital footprints;
- the law relating to indecent images;
- how to seek help and report concerns.

Pupils will be reassured that they can report concerns and will be supported, regardless of whether they created or shared an image themselves.

**Related Policies**

Further procedures for managing incidents involving nude and semi-nude images and/or videos are set out within each school's:

- Child Protection and Safeguarding Policy;
- Child-on-Child Abuse Policy;
- Online Safety Policy;
- Relationships, Sex and Health Education Policy;
- Behaviour (including Anti-Bullying) Policy.

## Context of safeguarding incidents

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

## Pupils potentially at greater risk of harm

Each school within the trust recognises that some groups of pupils can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.

**Pupils who need social workers**

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

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

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

**Home-Educated Children (Elective Home Education)**
Parents and carers have a legal right to choose elective home education (EHE) for their child. The Trust recognises that, while many children who are electively home educated receive appropriate education and care, children who are removed from school may become less visible to education, health and safeguarding services.

Where a parent or carer indicates an intention to withdraw a child from a Trust school to educate them at home, the school will consider whether there are any safeguarding concerns or vulnerabilities that require further discussion or support before the child is removed from roll.
Where appropriate and wherever possible, the school will work collaboratively with parents/carers, the Trust, the local authority and relevant professionals to understand the reasons for elective home education and ensure that the child's welfare and safeguarding needs continue to be considered.

Particular consideration will be given where the child:
- has special educational needs and/or disabilities (SEND);
- has a social worker;
- is looked after or previously looked after;
- has known safeguarding concerns;
- may be vulnerable to becoming isolated or less visible to services.

In accordance with the **School Attendance (Pupil Registration) (England) Regulations 2024**, schools within the Trust will ensure that the local authority is informed of all deletions from the admissions register where a pupil is removed from roll, including where this is due to elective home education.

The Trust recognises that safeguarding responsibilities do not end when a child leaves the school roll. Where concerns remain, the school will continue to work with safeguarding partners and follow appropriate referral and information-sharing procedures.

**Looked After Children (LAC) and Previously Looked After Children (PLAC)**
The Trust recognises that children who are looked after often have experienced abuse, neglect, trauma or significant disruption before coming into care. As a result, they may have increased safeguarding vulnerabilities and may require additional support to promote their safety, stability, wellbeing and educational outcomes.

Children who have previously been looked after, including care leavers, may also remain vulnerable due to their previous experiences and may require continued support and understanding.

The Board of Trustees will ensure that staff within the Trust have the knowledge, skills and understanding required to safeguard and support looked after and previously looked after children effectively.

Schools within the Trust will ensure that appropriate staff have access to relevant information about each child's circumstances, including (where appropriate):

- the child's looked after legal status, including whether they are looked after under voluntary arrangements with parental consent or subject to an interim or full care order;
- contact arrangements with parents, family members or others with parental responsibility;
- the child's care arrangements;
- the level of authority delegated to carers by the local authority;
- relevant safeguarding concerns, vulnerabilities and support needs.

The DSL will ensure that appropriate safeguarding information is available and shared with relevant staff on a need-to-know basis.

The DSL will be provided with the necessary details of:

- the child's allocated social worker;
- the Virtual School Head (VSH);
- the Designated Teacher;
- and, where appropriate for previously looked after children, the child's Personal Adviser.

Schools will ensure effective partnership working with social care, the Virtual School, parents/carers and other professionals to promote the child's welfare and educational success.

**Pupils with Special Educational Needs and/or Disabilities (SEND)**

The Trust recognises that children with SEND may face additional safeguarding vulnerabilities and may experience barriers that make it more difficult to recognise, communicate or report abuse or neglect.

Staff will understand that:

- indicators of abuse or neglect, including changes in behaviour, mood, communication, presentation or injuries, should not automatically be attributed to a child's disability or additional needs;
- children with SEND may experience abuse, bullying, exploitation, discrimination, neglect or child-on-child abuse at increased levels;
- some children may communicate distress differently or may require additional support to express concerns;
- communication barriers, cognitive differences or reliance on adults for care may increase vulnerability.

Staff will maintain professional curiosity and ensure that concerns about children with SEND are explored fully rather than assumed to be linked solely to the child's disability or diagnosis.

When managing safeguarding concerns involving a pupil with SEND, the DSL will work closely with:

- the school's Special Educational Needs Coordinator (SENCO);

- parents/carers where appropriate;
- relevant professionals and safeguarding partners.

The Trust recognises the importance of ensuring that safeguarding responses are accessible, inclusive and adapted to meet the individual communication and support needs of the child.

Where concerns are identified, the child's voice and lived experience will remain central to decision-making.

**LGBTQ+ Pupils**

The Trust recognises that a pupil's sexual orientation, gender identity or the fact that they may be LGBTQ+ is **not, in itself, a safeguarding risk factor**. All pupils have the right to be treated with dignity, respect and fairness and to learn in an environment that is safe, inclusive and free from discrimination.

However, the Trust recognises that some LGBTQ+ pupils, and pupils who are perceived by others to be LGBTQ+ (whether they identify as LGBTQ+ or not), may be vulnerable to additional safeguarding risks. These may include bullying, harassment, discrimination, abuse, online harms, prejudice-based behaviour, exploitation or other forms of harm.

Staff within the Trust will remain alert to the fact that a pupil's individual circumstances, relationships, experiences and wider environment may affect their vulnerability. Staff will not make assumptions about a pupil's identity, experiences or support needs but will maintain professional curiosity and respond appropriately where concerns arise.

The Trust recognises that risks may be increased where pupils do not have trusted adults with whom they feel safe to discuss their experiences, worries or concerns. All schools within the Trust will work to create an environment where every pupil feels valued, respected and able to seek support.

Staff will:

- challenge discriminatory, homophobic, biphobic or transphobic language and behaviour;
- take reports of bullying, harassment or abuse seriously;
- provide appropriate opportunities for pupils to raise concerns;
- ensure safeguarding responses are based on the individual needs and circumstances of the child;
- involve the DSL where there are concerns about a pupil's safety, wellbeing or vulnerability.

The Trust will ensure that safeguarding practice remains child-centred and focused on protecting pupils from harm, promoting their wellbeing and ensuring that all pupils receive appropriate support.

**Children Questioning Their Gender**

The Trust recognises that some children and young people may experience distress, vulnerability or additional safeguarding needs while questioning their gender.

Staff should be aware that children questioning their gender may experience:

- bullying, harassment, discrimination or prejudice-based abuse;
- social isolation;

- mental health difficulties, including anxiety, low mood or self-harm;
- online exploitation or grooming;
- pressure from peers, family members or online communities;
- increased vulnerability to extremism, coercion or harmful influences.

A child questioning their gender should not be viewed as a safeguarding concern solely because they are questioning their gender. However, staff should remain alert to any indicators that the child may be suffering, or at risk of suffering, harm.

Where concerns arise, staff should follow the Trust's safeguarding procedures and promptly share concerns with the Designated Safeguarding Lead (DSL).

The DSL will consider:
- the child's wishes and feelings;
- their age, maturity and understanding;
- their overall welfare and best interests;
- any risks relating to physical or mental health;
- any concerns regarding bullying, peer abuse, discrimination or family conflict;
- whether additional support or specialist advice is required.

Decisions relating to support for a child who is questioning their gender will be considered carefully, on an individual basis, and with appropriate regard to safeguarding, parental involvement, equality duties, privacy rights and relevant statutory guidance.

The Trust will work with parents/carers wherever appropriate unless doing so would place the child at risk of harm.

**Pupils Requiring Mental Health Support**

The Trust recognises that mental health and emotional wellbeing are important aspects of safeguarding and that children's mental health difficulties may arise from a range of factors.

All staff will be aware that changes in a pupil's mental health, behaviour, mood, presentation, relationships, attendance or engagement may indicate that a pupil has experienced, or may be at risk of experiencing, abuse, neglect, exploitation or other safeguarding concerns.

Staff will understand that mental health concerns do not automatically indicate that abuse or neglect has occurred. However, they should remain professionally curious and consider whether there may be underlying safeguarding factors contributing to a pupil's presentation.

Where concerns arise, staff will:
- listen to the pupil;
- provide appropriate reassurance and support;
- report safeguarding concerns promptly to the DSL or Deputy DSL(s);
- follow the Trust's safeguarding and mental health support procedures.

Schools within the Trust will work collaboratively with pupils, parents/carers and relevant professionals, where appropriate, to ensure that children receive suitable support for their mental health and wellbeing.

The Trust recognises the importance of early identification, prevention and intervention and will ensure that pupils experiencing mental health difficulties are supported while safeguarding concerns are appropriately assessed and addressed.

## Use of school premises for non-school activities

The Trust recognises that safeguarding responsibilities extend to situations where school premises are used by external organisations, community groups, clubs, providers or individuals to deliver activities involving children and young people.

Where a school within the Trust hires, leases, licenses or otherwise permits the use of its premises to external organisations or individuals, appropriate arrangements will be in place to safeguard and promote the welfare of children. Schools will have regard to the Department for Education's guidance **Keeping Children Safe in Out-of-School Settings** and any other relevant statutory safeguarding guidance.

The Trust will ensure that appropriate due diligence is undertaken before permitting external organisations to use school premises for activities involving children. This will include seeking assurance, proportionate to the nature of the activity, that providers have suitable safeguarding arrangements in place.

Where activities are delivered under the direct supervision, management or control of the school, the Trust's safeguarding, child protection, behaviour and staff conduct procedures will apply in full.

Where activities are provided independently by an external organisation, the Trust recognises that the provider retains primary responsibility for safeguarding children attending those activities. However, before granting access to school premises, the Board of Trustees, Local Governing Body, Headteacher or delegated representative will seek appropriate assurance that safeguarding arrangements are effective and suitable.

Such assurance may include, where appropriate:

- a safeguarding and child protection policy;
- a staff code of conduct;
- safer recruitment procedures;
- arrangements for managing allegations and low-level concerns;
- appropriate suitability and vetting checks for staff and volunteers;
- procedures for responding to safeguarding concerns and sharing information;
- health and safety arrangements;
- behaviour management procedures;
- arrangements for reporting concerns to statutory agencies where required.

The level of assurance sought will be proportionate to the nature, duration, frequency and risk associated with the activity being delivered.

The Trust will ensure that safeguarding expectations and responsibilities are clearly documented within any lease, licence, hire agreement, transfer of control agreement or other contractual arrangement relating to the use of school premises. Such agreements will specify safeguarding requirements and make clear that failure to comply with these requirements may result in the suspension or termination of the agreement.

Where appropriate, arrangements will be established to facilitate communication between the external provider and the school, including procedures for reporting safeguarding concerns relating to children who attend the school.

The Trust reserves the right to withdraw permission for the use of its premises where safeguarding concerns arise or where providers fail to maintain satisfactory safeguarding arrangements.

**Extra-Curricular Activities, Extended Services and Clubs**

The Trust recognises the valuable contribution that extra-curricular activities, extended services, sports clubs, community groups and enrichment programmes make to children's development, wellbeing and educational experience.

All activities delivered by Trust schools, whether during or outside normal school hours, will operate in accordance with the Trust's safeguarding and child protection procedures.

Where extra-curricular activities or clubs are delivered by external organisations, schools will work collaboratively with those providers to promote the safety and welfare of children and ensure that appropriate safeguarding arrangements are in place.

Staff, volunteers and providers delivering activities involving children will be expected to:

- understand their safeguarding responsibilities;
- promote the welfare and wellbeing of children;
- maintain appropriate professional boundaries;
- recognise indicators of abuse, neglect, exploitation and other safeguarding concerns;
- know how to report concerns and seek advice;
- understand local safeguarding procedures and reporting pathways.

Where concerns arise regarding a child's safety or welfare, staff and volunteers must take prompt action in accordance with safeguarding procedures and refer concerns to the Designated Safeguarding Lead (DSL), Children's Social Care, the police or other relevant agencies as appropriate.

The Trust will seek assurance that organisations delivering activities involving children have appropriate safeguarding training arrangements in place and that adults working with children understand their responsibilities for safeguarding and child protection.

**Sports Organisations and their Governing Bodies**

Where activities involve sport or physical recreation, schools will encourage providers and governing bodies to comply with recognised safeguarding standards and national safeguarding expectations.

The Trust expects organisations affiliated to, or funded through, national sporting bodies to work towards and maintain appropriate safeguarding standards, including compliance with safeguarding requirements established by their respective governing bodies and relevant national frameworks.

## Alternative Provision

The Trust recognises that pupils attending alternative provision (AP) may have complex educational, behavioural, health, social or safeguarding needs and may therefore be at increased risk of abuse, neglect, exploitation or becoming less visible to safeguarding services. The Trust remains responsible for promoting the welfare of pupils placed in alternative provision and will maintain appropriate oversight of each placement.

Before a placement is made, the Trust and its schools will undertake appropriate due diligence to satisfy themselves that the alternative provision is suitable to meet the pupil's educational, safeguarding and welfare needs. This will include seeking written assurance, where appropriate, that the provider:

- has effective safeguarding and child protection policies and procedures that reflect current statutory guidance;
- has safer recruitment and appropriate vetting arrangements in place for staff and volunteers;
- has suitable arrangements for managing safeguarding concerns, allegations and low-level concerns;
- provides appropriate supervision, behaviour management and pastoral support;
- has effective procedures for recording and sharing safeguarding information;
- understands how to work with safeguarding partners where concerns arise.

The level of assurance sought will be proportionate to the nature of the placement and the risks identified for the individual pupil.

Prior to placement, schools will ensure that relevant safeguarding information is shared with the alternative provider to enable appropriate support and risk management. Equally, the Trust expects alternative providers to share safeguarding concerns promptly with the placing school so that appropriate action can be taken.

The Designated Safeguarding Lead (DSL) will maintain appropriate communication with the alternative provider throughout the placement and will ensure that safeguarding information is reviewed and updated where necessary.

The Trust will satisfy itself that each placement continues to meet the pupil's educational, safeguarding and welfare needs through regular monitoring, review and communication with the provider, the pupil, parents/carers and other relevant professionals.

Those responsible for commissioning, monitoring or reviewing alternative provision will recognise that pupils attending alternative provision may be particularly vulnerable to contextual safeguarding risks, including exploitation, child-on-child abuse, criminal exploitation, sexual exploitation, online harms and other extra-familial risks. These vulnerabilities will be considered when assessing, reviewing and supporting placements.

## Work Experience

The Trust recognises that its schools can provide valuable opportunities for pupils seeking work experience, while also requiring appropriate safeguarding arrangements.

Schools will ensure that appropriate safeguarding and health and safety checks are undertaken before pupils commence work experience placements. The suitability of the placement will be assessed having regard to the age, maturity, vulnerability and individual needs of the pupil.

Schools will ensure that pupils understand how to raise concerns during their placement and know who they can contact if they feel unsafe or require support.

Safer recruitment and vetting requirements will be applied in accordance with statutory guidance. Any DBS checks required will be determined in line with current legislation and the nature of the role being undertaken, rather than solely by the age of the pupil.

## Private Fostering

The Trust recognises that privately fostered children may be particularly vulnerable and may require additional safeguarding support.

Private fostering occurs when a child under the age of 16 (or under 18 where the child has special educational needs and/or disabilities) is cared for by someone who is not their parent, a person with parental responsibility or a close relative for a period of 28 days or more.

All staff will be aware of the indicators that a child may be living in a private fostering arrangement and will report any concerns to the Designated Safeguarding Lead (DSL).

Where the Trust becomes aware that a pupil may be privately fostered, the DSL will notify the relevant local authority as soon as reasonably practicable so that the local authority can fulfil its statutory duties and undertake any necessary assessments or visits.

The Trust will continue to work in partnership with the local authority, parents/carers, private foster carers and other relevant professionals to safeguard and promote the welfare of the child.

## Concerns about pupils

The Trust recognises that safeguarding is everyone's responsibility and that all staff have a duty to identify, respond to and report concerns about a child's welfare at the earliest opportunity. Every member of staff has a responsibility to act where they have concerns that a child may be suffering, or is likely to suffer, abuse, neglect, exploitation or any other form of harm.

The Board of Trustees will ensure that robust safeguarding arrangements are implemented consistently across all schools within the Trust. The Trust will monitor the effectiveness of safeguarding practice through quality assurance activities, safeguarding reviews, and regular reporting to the Board.

A safeguarding link governor supports monitoring, but responsibility rests with the governing body as a whole. The designated governor (or safeguarding link governor) within each school will undertake safeguarding monitoring visits at least termly to provide assurance that safeguarding arrangements are operating effectively. These visits will include consideration of whether the school:

- has clear and well-understood procedures for staff to report safeguarding concerns promptly to the Designated Safeguarding Lead (DSL) or Deputy DSL(s);
- has effective arrangements for the DSL to seek advice, make referrals and work collaboratively with Children's Social Care, Family Help services, safeguarding partners and other relevant agencies;
- ensures safeguarding concerns are responded to promptly, appropriately and in accordance with statutory guidance;
- provides safeguarding induction, training and regular updates so that staff understand their safeguarding responsibilities;
- maintains effective safeguarding recording systems and information-sharing arrangements;
- promotes a culture where safeguarding concerns are identified, recorded, shared and acted upon without delay.

The Trust recognises that children may not feel ready, able or know how to tell someone that they are experiencing abuse, neglect, exploitation or other forms of harm. Children may not recognise that what is happening to them is abusive, may feel embarrassed, frightened or ashamed, may fear the consequences of telling someone, or may have communication needs that make disclosure difficult.

All staff will therefore maintain **professional curiosity**, remain vigilant to changes in a child's presentation, behaviour or circumstances, and consider the child's lived experience when assessing concerns. Staff will never assume that someone else has acted and will always report concerns to the DSL or Deputy DSL(s), even where there is uncertainty about the level of risk.

Where concerns indicate that a child or family may benefit from additional support, the DSL will consider whether **Early Help**, **Family Help** (where available locally), or other multi-agency support is appropriate. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the DSL will make an immediate referral to Children's Social Care and, where appropriate, the police.

The Trust will ensure that all staff understand the importance of timely, lawful and proportionate information sharing. Staff will understand that data protection legislation does not prevent the sharing of information where this is necessary to safeguard or promote the welfare of a child. Where staff are uncertain whether information should be shared, they will seek advice from the DSL without delaying action that may be necessary to protect a child.

The Trust has a zero-tolerance approach to all forms of abuse, including **child-on-child abuse**. All concerns involving child-on-child abuse, including sexual harassment, sexual violence, harmful sexual behaviour, bullying, exploitation or online abuse, will be managed in accordance with the Trust's **Child-on-Child Abuse Policy** and safeguarding procedures.

The Trust recognises the importance of working collaboratively with children, families and partner agencies to achieve the best possible outcomes. Where appropriate, and where this is consistent with the child's safety and best interests, the DSL will consider whether a **Family Group Decision-Making (FGDM)** approach or other family-led planning process may help identify and coordinate support within the wider family network. This will not delay referrals to Children's Social Care where statutory intervention is required.

All safeguarding concerns, decisions, actions taken and outcomes will be recorded accurately, contemporaneously and securely in accordance with the Trust's safeguarding recording procedures.

## Managing referrals

The Trust is committed to ensuring that safeguarding concerns are identified, responded to and referred promptly in order to protect children from harm. All staff have a responsibility to act immediately where they are concerned about a child's safety or welfare and must follow the Trust's **Reporting Safeguarding Concerns Flowchart** and safeguarding procedures.

All staff, particularly Designated Safeguarding Leads (DSLs) and Deputy DSLs (DDSLs), will be familiar with the local safeguarding partnership arrangements, local authority referral pathways and threshold guidance. The DSL will provide advice, guidance and support to staff where required and will ensure that referrals are made in a timely, child-centred and proportionate manner.

Where a child may be suffering, or is likely to suffer, significant harm, the DSL (or another appropriate member of staff if necessary) will make an immediate referral to Children's Social Care and, where appropriate, the police. If a child is in immediate danger, any member of staff may make a referral directly to Children's Social Care or contact the emergency services without delay. The DSL must be informed as soon as possible thereafter.

Where a child or family would benefit from additional support but the threshold for statutory intervention is not met, the DSL will consider whether **Early Help**, **Family Help** (where available locally), or other appropriate multi-agency support should be initiated.

Information shared with external agencies will be relevant, necessary, proportionate, accurate, timely and shared in accordance with data protection legislation and statutory safeguarding guidance. Staff will understand that concerns about confidentiality or data protection must not prevent appropriate information sharing where this is necessary to safeguard or promote the welfare of a child.

The Trust expects DSLs to work collaboratively with Children's Social Care, Family Help services, health professionals, education providers, the police and other safeguarding partners to ensure that children receive appropriate support and protection. The DSL will contribute to assessments, strategy

discussions, child protection conferences, child in need meetings, Team Around the Family (TAF) meetings, Family Help arrangements and other multi-agency processes where appropriate.

Where criminal investigations are taking place, the Trust will work closely with the police and other agencies to ensure that safeguarding action supports the child while avoiding actions that could compromise any investigation.

Schools within the Trust will not delay taking action to safeguard a child because a statutory assessment, police investigation or other enquiry is ongoing or has not yet commenced. Appropriate support and protective measures will be implemented immediately where required.

Where Children's Social Care decides that statutory intervention is not appropriate, the DSL will carefully consider the rationale for that decision. If the school believes that a child remains at risk of harm or that the child's needs have not been appropriately addressed, the DSL will follow local escalation or professional challenge procedures and re-refer where appropriate. Where statutory intervention is not required and the Trust agrees with the decision, the DSL will consider what other support, including Early Help, Family Help or pastoral intervention, may be appropriate.

The Trust recognises the importance of keeping children informed, where appropriate and in accordance with their age, understanding and best interests. Wherever possible, children will be supported to understand the safeguarding process, the decisions being made, the support available and the actions being taken to keep them safe.

The Trust will normally work in partnership with parents and carers when safeguarding concerns arise. However, parents or carers will not be informed before a referral is made where doing so may place a child or another person at increased risk of harm, prejudice a criminal investigation or otherwise compromise the child's safety.

All safeguarding referrals, decisions, discussions, actions taken and outcomes will be recorded accurately, promptly and securely in accordance with the Trust's safeguarding recording procedures.

**Professional Challenge and Escalation**

The Trust recognises that effective safeguarding relies upon constructive professional challenge and robust multi-agency working.

Where there is disagreement regarding decisions made by another agency, or where staff believe that a child's needs have not been appropriately recognised or addressed, the DSL will follow the local safeguarding partnership escalation procedures to ensure that the child's welfare remains paramount. Staff will continue to advocate for children where they believe that further assessment, intervention or support is required.

## Concerns About Trust Safeguarding Practice

The Trust promotes an open and transparent safeguarding culture in which all staff feel confident to raise concerns about safeguarding practice.

Any concerns regarding safeguarding practice within a school or across the Trust should be raised promptly with the Headteacher or other appropriate senior leader, in accordance with the Trust's safeguarding and governance procedures.

Where a member of staff feels unable to raise concerns through normal management channels, or believes that concerns have not been addressed appropriately, they should follow the Trust's **Whistleblowing Policy**. Staff may also seek advice or report concerns through external whistleblowing routes where appropriate, including the NSPCC Whistleblowing Advice Line.

No member of staff will suffer detriment for raising genuine safeguarding concerns in good faith.

## Safeguarding Concerns and Allegations About Adults Working with Children

The Trust will manage all safeguarding concerns, allegations and reports relating to adults working with children in accordance with statutory guidance, local safeguarding arrangements and the Trust's **Allegations of Abuse Against Staff and Volunteers Policy**.

This applies to concerns involving:

- trainee teachers
- employees;
- agency and supply staff;
- volunteers;
- governors and trustees;
- contractors;
- third-party providers;
- anyone undertaking work on behalf of the Trust.

The Trust recognises the distinction between:

- **allegations that may meet the harm threshold**; and
- **low-level concerns** which do not meet the harm threshold but may indicate behaviour inconsistent with the Trust's staff code of conduct or expected professional standards.

An allegation may meet the harm threshold where an adult has:

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

The Trust will ensure that all allegations meeting the harm threshold are referred promptly to the appropriate agencies, including the Local Authority Designated Officer (LADO) where required, and managed in accordance with statutory procedures.

Low-level concerns will be managed in accordance with the Trust's **Low-Level Concerns Policy**. All staff are expected to report low-level concerns so that patterns of behaviour can be identified, risks managed appropriately and a strong safeguarding culture maintained.

The welfare of the child will remain the Trust's paramount consideration throughout all safeguarding and allegation management processes.

## Communication, Information Sharing and Confidentiality

The Trust recognises that effective safeguarding depends upon timely, accurate and appropriate communication and information sharing between staff, schools, safeguarding partners and other relevant agencies. The welfare of the child is paramount, and concerns about confidentiality or data protection must never prevent information from being shared where this is necessary to safeguard or promote the welfare of a child.

All staff will understand that they have a responsibility to share safeguarding information appropriately and without unnecessary delay where there are concerns that a child may be suffering, or is likely to suffer, abuse, neglect, exploitation or any other form of harm.

The Designated Safeguarding Lead (DSL) in each school will ensure that safeguarding information is managed in accordance with statutory guidance and will:

- understand the importance of effective information sharing within the school, across the Trust and with safeguarding partners, Children's Social Care, Family Help services (where applicable), health professionals, the police and other relevant agencies;
- ensure that safeguarding information accompanies pupils whenever they transfer to another school or educational setting, including in-year transfers and transition between phases of education, so that appropriate support can continue without delay;
- understand and apply the requirements of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and relevant information-sharing guidance;
- maintain accurate, factual, contemporaneous and secure safeguarding records;
- ensure that records include concerns raised, discussions held, decisions made, actions taken and the rationale for those decisions, including where referrals are made, not made or where professional challenge or escalation has taken place;
- ensure safeguarding records are retained, stored securely and transferred appropriately in accordance with statutory requirements and the Trust's records management procedures.

The Trust recognises that effective safeguarding often depends upon sharing information with appropriate professionals at the right time. Information will be shared lawfully, proportionately, accurately, securely and only with those who need the information to safeguard or promote the welfare of a child.

All safeguarding and child protection information will be treated as confidential. Access to safeguarding records will be restricted to those with a legitimate safeguarding need to know. Staff must not discuss safeguarding concerns outside appropriate professional contexts or disclose information unnecessarily.

Staff will never promise a child that information shared with them will be kept confidential. Where a child makes a disclosure, staff will explain, in an age-appropriate manner, that information may need to be shared with other professionals whose role is to help keep them safe. Wherever appropriate, children will be informed about what information will be shared, with whom and the reasons for doing so.

The Trust recognises that, in some circumstances, information may need to be shared without the consent of the child or their parent/carer where there is a lawful basis to do so and where this is necessary to safeguard or promote the welfare of a child, protect another person from harm, or support the prevention, detection or prosecution of crime. Decisions to share information without consent will always be carefully considered, proportionate, recorded and based upon the individual circumstances of the case.

Where a child has experienced sexual violence, sexual abuse or sexual harassment, the Trust will respect and protect the child's privacy and dignity. The Trust recognises that victims of alleged sexual offences are entitled to lifelong anonymity under the law, subject to limited statutory exceptions. Information relating to such cases will only be shared with those who need to know in order to safeguard children, support the victim, manage risk or comply with legal obligations.

Where criminal investigations are ongoing, the Trust will work closely with the police and other agencies to ensure that information is shared appropriately and that actions taken by the school do not compromise any investigation.

The Trust will normally work in partnership with parents and carers where safeguarding concerns arise. However, parents or carers will not be informed before information is shared or a referral is made where doing so could:

- place a child or another person at increased risk of harm;
- prejudice a criminal investigation;
- compromise safeguarding enquiries; or
- otherwise be contrary to the child's best interests.

The DSL will determine, in consultation with relevant agencies where appropriate, when and how parents or carers should be informed.

The Trust expects all staff to exercise professional judgement and seek advice from the DSL whenever there is uncertainty regarding information sharing. Staff should not delay sharing information where doing so may place a child at risk.

Any actual or suspected breach of confidentiality, unauthorised disclosure of safeguarding information or inappropriate handling of safeguarding records will be treated seriously. Such incidents will be investigated promptly, appropriate remedial action will be taken, and lessons learned will be used to strengthen safeguarding practice, information governance and staff training.

## Safer recruitment

The Trust is committed to safeguarding and promoting the welfare of children by ensuring that robust safer recruitment procedures are followed for all individuals who work, volunteer or provide services within the Trust and its schools.

The Trust's detailed procedures for safer recruitment, including recruitment processes, pre-employment checks, interview arrangements, references, risk assessments and induction requirements, are outlined within the **Safer Recruitment Policy**.

The Trust recognises that safer recruitment is an essential safeguarding measure and that appropriate checks must be completed before individuals begin working with children, unless exceptional circumstances apply and appropriate safeguards are in place.

The Board of Trustees retains overall responsibility for ensuring that safer recruitment arrangements are effective across the Trust. This responsibility may be delegated appropriately to senior leaders, schools or authorised personnel, but accountability remains with the Trust.

**Pre-Employment and Suitability Checks**

The Trust will ensure that appropriate pre-employment and suitability checks are undertaken for all prospective employees, including:

- new employees;
- existing employees moving to roles requiring additional checks;
- internal candidates;
- individuals who have lived or worked outside the UK;
- volunteers;
- trustees and governors;
- contractors and third-party workers where appropriate.

The checks undertaken will be proportionate to the role and level of contact the individual will have with children and will comply with statutory safeguarding requirements.

An enhanced Disclosure and Barring Service (DBS) check with barred list information will be obtained for individuals undertaking **regulated activity** with children.

A person is considered to be undertaking regulated activity where their role involves the type of work and level of contact defined in legislation, which may include individuals who:

- are responsible for the care or supervision of children;
- regularly work in schools or educational settings when children are present;
- undertake activities that meet the regulated activity criteria.

The Trust will use the Department for Education (DfE) and Disclosure and Barring Service guidance to determine whether a role requires an enhanced DBS check with barred list information.

**Volunteers**

The Trust recognises the valuable contribution made by volunteers across its schools and is committed to ensuring that all volunteers are suitable to work with children and understand their safeguarding responsibilities.

All volunteers will be subject to appropriate safeguarding checks based on the nature of their role, the frequency of their activities, the level of supervision provided and whether their role meets the definition of regulated activity.

Where a volunteer is undertaking **regulated activity with children**, an **Enhanced DBS check with Children's Barred List information** will be obtained before the volunteer begins their role.

A volunteer may be considered to be undertaking regulated activity where they carry out relevant activities frequently (once a week or more), on more than three days in any 30-day period, or overnight, and where the activity meets the statutory definition of regulated activity.

Where a volunteer is not undertaking regulated activity, the Trust will undertake an appropriate assessment of risk and determine what checks and safeguarding measures are required. This may include:

- an Enhanced DBS check without barred list information;
- identity checks;
- references;
- safeguarding induction;
- appropriate supervision arrangements;
- ongoing monitoring of suitability.

Where volunteers are supervised by staff who are engaging in regulated activity, the Trust will ensure that the supervision arrangements are sufficient, reasonable and appropriate to safeguard children.
The Trust will maintain records of volunteer checks, including any risk assessments undertaken to determine whether a DBS check is required.

**Contractors, Self-Employed Individuals and Third-Party Workers**

The Trust recognises that safeguarding responsibilities extend to individuals working on behalf of schools, including contractors, agency workers, self-employed individuals and third-party providers.

Schools within the Trust will ensure that appropriate checks and assurances are obtained before individuals begin work that involves contact with children.

Where contractors or self-employed individuals are required to undertake DBS checks, the Trust will ensure that appropriate arrangements are in place, including confirmation that checks have been completed through an appropriate registered body or umbrella organisation where applicable.

Where third-party organisations provide services within Trust schools, written confirmation will be obtained that appropriate safeguarding and suitability checks have been undertaken.

**Overseas Checks**

The Trust recognises that individuals who have lived or worked outside the UK may require additional checks to establish their suitability to work with children.

Where applicable, schools will obtain appropriate overseas criminal record information or certificates of good conduct, having regard to the guidance issued by the DfE.

Where overseas checks cannot be obtained, the Trust will ensure that appropriate alternative safeguarding measures are considered and recorded.

**DBS Referrals**

The Trust will make a referral to the Disclosure and Barring Service (DBS) where it is legally required to do so.

A referral will be made where the Trust has removed an individual from regulated activity with children because they:

- have harmed a child or placed a child at risk of harm;
- have committed, or may have committed, a relevant offence against a child;
- are considered unsuitable to work with children.

The duty to refer applies where an individual is removed from regulated activity, including where they:

- are dismissed;
- resign or otherwise leave their role following safeguarding concerns;
- are suspended;
- are redeployed to duties that do not involve regulated activity.

The Trust will ensure that decisions regarding DBS referrals are made promptly and recorded appropriately.

## Single Central Record (SCR)

The Trust will maintain an accurate and up-to-date **Single Central Record (SCR)** for all schools within the Trust.

The SCR will provide evidence that appropriate recruitment and safeguarding checks have been completed and will be maintained in a format that enables information relating to each individual school to be accessed separately and promptly when required, including for inspection purposes.

The SCR will include, where applicable, details of:

- identity checks;
- enhanced DBS checks;
- children's barred list checks;
- prohibition from teaching checks;
- checks of professional qualifications where required;
- right to work in the UK checks;
- overseas checks where applicable;

- Section 128 checks for individuals undertaking management positions;
- further checks required for specific roles;
- details of DBS checks undertaken for volunteers;
- whether a volunteer is engaging in regulated activity;
- any risk assessment undertaken where a volunteer is not subject to a barred list check;
- supervision arrangements where applicable.

The Trust will ensure that SCR records are accurate, secure and regularly monitored.

**Agency and Supply Staff**

Schools within the Trust will ensure that appropriate safeguarding checks have been completed for agency workers, supply staff and third-party staff before they begin work.

Where staff are supplied through an agency or employment business, the Trust will obtain written confirmation that the appropriate checks have been completed.

Confirmation will include:

- confirmation that required DBS checks and suitability checks have been completed;
- confirmation of the date checks were completed;
- confirmation of any relevant information relating to suitability.

Where individuals are providing education or services on behalf of the Trust, including through online delivery, appropriate safeguarding checks and assurances will be obtained.

**SCR Records for Volunteers and Additional Safeguarding Information**

The Single Central Record (SCR) will include appropriate information relating to volunteers and any additional safeguarding checks or assessments undertaken to support effective safeguarding practice.

Where applicable, the SCR will record:

- details of any DBS checks undertaken for volunteers, including the level of check completed;
- whether the volunteer is engaging in regulated activity with children;
- whether a Children's Barred List check has been undertaken where the role meets the definition of regulated activity;
- details of any risk assessments undertaken to determine whether a volunteer requires a DBS check or whether a barred list check is required;
- details of supervision arrangements where a volunteer is not engaging in regulated activity but is working with children under supervision;
- written confirmation from supply agencies, employment businesses or third-party providers that required safeguarding and suitability checks have been completed;
- any additional safeguarding information considered necessary to demonstrate that appropriate measures are in place to safeguard children.

The Trust will ensure that decisions regarding DBS checks, barred list checks, supervision arrangements and risk assessments are appropriately recorded and regularly reviewed to ensure that they remain suitable and effective.

Information relating to individuals will be removed from the SCR when they cease working, volunteering or providing services for the Trust or any of its schools, in accordance with the Trust's data retention requirements and records management procedures.

## Training

The trust will ensure that staff working in each of its schools undergo safeguarding and child protection training at induction, which will be updated on a **yearly** basis and/or whenever there is a change in legislation / guidance.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE).
- The Behaviour (including Anti-Bullying) Policy.
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.

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

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

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

DSLs and deputy DSLs will undergo training to provide them with the knowledge and skills required to carry out the role and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up to date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conference, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.

The risks associated with online safety, including the additional risks faced online by pupils with SEND.

## Monitoring and review

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

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

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

If any concerns are raised by the LADO or Ofsted about safeguarding issues, the following actions will be taken:

- The DSL conducts an investigation as a priority and comply with any deadlines given
- The Chair of the School Board reports to the LADO or Ofsted on the findings of the investigation and sets out any action to be taken
- The school endeavours to comply as soon as possible with any recommendations from the LADO or Ofsted

## Appendix A - Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:

1. Artificial Intelligence (AI), Deepfakes and Manipulated Images
2. AI-Generated Sexual Abuse and Image-Based Abuse
3. Child Missing Education (CME)
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. Cyber-crime
7. Child sexual exploitation (CSE)
8. Child on Child Harmful Sexual Behaviour
9. Domestic abuse
10. Economic Abuse
11. FGM
12. Forced marriage
13. Gender Questioning Children
14. Homelessness
15. Mental health
16. Misinformation, Disinformation and Conspiracy Theories
17. Modern slavery
18. Pupils with family members in prison
19. Pupils required to give evidence in court
20. Radicalisation
21. Serious violence
22. Virginity testing and hymenoplasty
23. Young Carers

**Artificial Intelligence (AI), Deepfakes and Manipulated Images**

Children may be exposed to risks arising from artificial intelligence tools, including:

- creation or sharing of manipulated images;
- deepfake content;
- nudification apps and technologies;
- online harassment, blackmail or sexual abuse involving AI-generated content;
- misinformation and disinformation.

Staff should report concerns to the DSL and follow the Trust's online safety and child protection procedures.

**AI-Generated Sexual Abuse and Image-Based Abuse**

Staff should be aware that technology can facilitate abuse through:

- AI-generated nude images;
- synthetic sexual content;

- image manipulation;
- sextortion and blackmail;
- sharing or threatening to share altered images.

Incidents should be treated as safeguarding concerns and managed in the same way as other forms of child sexual abuse, exploitation or image-based abuse.

**Child Missing Education (CME)**

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The trust will ensure that its schools respond to children persistently being absent from education and will support schools in identifying such abuse and help prevent the risk of pupils becoming absent from education in the future.

Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Child Missing Education (CME) Policy.

Schools within the trust will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

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

*Admissions register*

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

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

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

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

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

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

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

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

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

Schools will also remove a pupil from the admissions register where the school and LA have been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

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

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

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

**Child abduction and community safety incidents**

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

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

Schools within the trust will provide pupils with practical advice and lessons to ensure they can keep themselves safe outdoors.

**Child criminal exploitation (CCE)**

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

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

Specific forms of CCE can include:

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

All staff across the Trust will recognise that children who are criminally exploited are victims of abuse, regardless of whether they have committed criminal offences or whether their involvement appears to be consensual. It is not possible for a child to consent to exploitation, abuse or trafficking. Staff will understand that children of any gender can be at risk of Child Criminal Exploitation (CCE) and that many may not recognise they are being exploited. All safeguarding concerns relating to CCE will therefore be responded to through a child-centred, victim-focused approach.

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

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

*County lines*

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

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

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.

- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging,' where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

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

**Cyber-crime**

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

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

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

**Child sexual exploitation (CSE)**

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

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

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

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

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

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

**Domestic abuse**

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

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

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

**Economic Abuse**

Economic abuse can occur within domestic abuse and may affect children directly or indirectly.

Examples include:

- controlling access to money;
- preventing access to essential resources;
- creating financial dependency;
- exploiting a child's finances or benefits.

Economic abuse can have a significant impact on a child's wellbeing, safety and development. Concerns should be reported to the DSL.

**FGM**

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

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

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

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

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

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

Indicators that FGM may take place soon include:

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

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

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

FGM is included in the definition of **"Honour or Faith-based' abuse (HBA)"** which includes all forms of abuse committed to protect or defend the perceived honour of an individual, family, community or based on misinterpreted beliefs about faith. It includes, but is not limited to, Female Genital Mutilation (FGM), forced marriage and other harmful practices. All forms of honour or faith-based abuse are child abuse and should be treated as safeguarding concerns regardless of the motivation. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

**Forced marriage**

Forced marriage is another form of **Honour or Faith-based' abuse (HBA)** and is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

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

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

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.

- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

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

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

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

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

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

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

The school will support any victims to seek help by:

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

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

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

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

**Gender Questioning Children**

Children who are questioning their gender may experience increased vulnerability due to:

- bullying or discrimination;
- social isolation;
- family conflict;
- mental health needs;
- online harms and exploitation.

Staff should be vigilant to safeguarding concerns and follow Trust safeguarding procedures where concerns arise.

**Homelessness**

The DSL and deputy DSLs in each of the trust's schools will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

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

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

**Mental health**

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

Staff will not attempt to make a diagnosis of mental health problems and schools will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one.

These indicators include, but are not limited to:

• Significant changes in behaviour;
• Ongoing difficulty sleeping;

• Withdrawing from social situations;
• Not wanting to do things they usually enjoy.

If a child is in danger, the DSL / staff will call 999 or take them to A&E. If urgent but not an emergency, the NHS 111 will be called, selecting the mental health option.

The trust will ensure that staff are also aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff within the trust and its schools who have a mental health concern about a pupil that is also a safeguarding concern are encouraged by the trust to act in line with this policy and their school-level Child Protection and Safeguarding Policy and speak to the DSL or DDSL(s).

The trust will ensure its schools can access a range of advice to help staff members identify pupils in need of additional mental health support, including working with external agencies. It will also ensure that there is a wide variety of advice and support offered to its schools while ensuring an ethos that is positive towards being open about mental health is adopted and implemented in each school.

In all cases of mental health difficulties, the Trust's Mental Health and Emotional Wellbeing Policy will be consulted and adhered to at all times.

**Misinformation, Disinformation and Conspiracy Theories**
Children may be exposed to harmful online content including misinformation, disinformation and conspiracy theories.

Such content may:
- cause emotional harm;
- affect behaviour and decision-making;
- contribute to radicalisation risks;
- undermine wellbeing and relationships.

Concerns about a child's welfare arising from such exposure should be discussed with the DSL.

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

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

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

**Pupils required to give evidence in court**

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

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

**Radicalisation**

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

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

For the purposes of this policy, **"terrorism"** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the trust's wider safeguarding duties. Schools within the trust will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. The trust will ensure that procedures are in place for staff to be alerted to changes in pupils' behaviour which could indicate that they may need help or protection. The trust will also ensure that staff can use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The trust and its schools will work together with local safeguarding arrangements as appropriate.

The trust will ensure that schools engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the trust will assist and advise family members who raise concerns and provide information for support mechanisms.

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

*The Prevent duty*

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

The trust's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in school-level Prevent Duty Policies.

**Serious violence**

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

- Frequent absence from school.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- changes in friendships or peer groups;
- carrying a weapon;
- increased aggression or violent behaviour;
- unexplained money, gifts, new possessions or expensive items;
- involvement in county lines or criminal exploitation;
- significant decline in behaviour or educational engagement.

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

- Being male.
- Having been frequently absent from school.
- Having been permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff are trained to:

- recognise the warning signs of serious violence;
- understand local patterns and contextual safeguarding risks;

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

- make referrals where appropriate to children's social care and/or the police;
- work with safeguarding partners and community agencies;
- include serious violence within safeguarding training and child-on-child abuse procedures.

The school will be aware that the Police, Crime, Sentencing and Courts 2022 Act expects a range of specified authorities, such as the police, to share data and information, and put plans in place to prevent and reduce serious violence within their local communities. Schools will be under a separate duty to cooperate with core duty holders when asked – the school will ensure arrangements are in place to do so.

**Virginity testing and hymenoplasty**

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

*Virginity testing*

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

*Hymenoplasty*

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

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

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

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

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

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a prolonged period which was not a problem previously

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

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

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

**Young Carers**

A young carer is a child who provides, or intends to provide, care for another person.

Young carers may experience:

- poor attendance;
- emotional wellbeing concerns;
- social isolation;
- safeguarding risks linked to caring responsibilities.

Staff should be alert to indicators that a child may be undertaking inappropriate or excessive caring responsibilities and refer concerns to the DSL.

## Appendix C - Key Contacts

**The safeguarding team**

| Role | Insert Name/s | Insert Contact number |
|---|---|---|
| Designated Safeguarding Lead | Tanyel Hill | 0208 467 6933<br>familyworker@redhill.broley.sch.uk |
| Designated Prevent Lead | Becci McManus | 0208 467 6933 |
| Deputy Designated Safeguarding Leads | Becci McManus<br>Emma Nolan<br>Katie Melvin<br>Kirsty Long<br>Fiona Marshall<br>Sorcha Black | 0208 467 6933 |
| Designated teacher for looked after and previously looked after children | Emma Nolan | 0208 467 6933 |
| Designated Mental Health Lead | Fiona Marshall | 0208 467 6933 |

Other school contacts

| Role | Insert Name | Insert Contact number |
|---|---|---|
| Head Teacher | Becci McManus | 0208 467 6933 |
| Chair of School Board | Alison Barfoed | 0208 467 6933 |
| Link Designated Governor | Nancy Andrews | 0208 467 6933 |

**Local authority contacts**

| Service | Insert Contact number | Insert Email address |
|---|---|---|
| Children and Families Hub (MASH) | **020 8461 7373** or<br>**020 8461 7379** | mash@bromley.gov.uk<br>or<br>candfhub@bromley.gov.uk |
| Emergency Duty Service | **0300 303 8671** | |
| Emotional Wellbeing and Mental Health Services | 020 3770 8848 | info@bromleyy.org |
| Local Authority Designated Officer | 020 8431 7775<br>or<br>020 8313 4325 | LADO@bromley.gov.uk |
| Virtual School Head | 020 8 461 7723 | Virtual.school@bromley.gov.uk |

**Other contacts**

| | |
|---|---|
| NSPCC Whistleblowing helpline | 0800 028 0285 |
| The DfE counter-extremism helpline | 020 7340 7264<br>counter.extremism@education.gsi.gov.uk |
| NSPCC FGM Helpline: | 08000283550 Email: fgmhelp@nspcc.org.uk |

| | |
|---|---|
| Operation Encompass Teachers' Advice and Helpline | 0204 513 9990 |
| Harmful Sexual Behaviour Support Service helpline for Practitioners | 0344 2250623 hsbsupport@swgfl.org.uk |

## Appendix D - FLOWCHART Actions to take if you have a concern

**Why are you concerned?**

For example
- Allegation/ child shares a concern or worry
- Indicators of abuse or neglect

**Immediately record your concerns**

- Record concern on CPOMS

**Inform the Designated Safeguarding Lead or Deputy DSLs**: (Tanyel Hill- DSL

Becci McManus, Emma Nolan, Katie Melvin, Kirsty Long, Fiona Marshall & Sorcha Black – DDSL)

**Actions for the Safeguarding Team**

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Consult the LSCP threshold document for further guidance.
- If the child **is at imminent risk of harm** a referral will be made to Children's Social Care Single Point of Contact Consultation Line (SPOC) on (*insert Phone number*)
- If the child is **NOT** at imminent risk then a referral will be made to *(insert email address) or (insert Phone number)*

**If you are unhappy with the response**

**Staff:**

- Follow local escalation procedures
- Follow Whistleblowing procedures

**Pupils and Parents:**

- Follow school complaints procedures

**Record decision making and action taken on CPOMS**

**Monitor -** Be clear about:

- What action you have taken at the time of reporting the concerns.
- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

**Review** and **request further support** (if necessary)

At all stages the child's circumstances will be kept under review
The DSL/Staff will request further support if required to ensure the **child's safety** is **paramount**

## Appendix E - Safeguarding in the EYFS

All safeguarding practices in the main body of this policy apply to the EYFS. In addition, all Early Years providers must follow the safeguarding and welfare requirements of the EYFS statutory framework. This includes Safeguarding training that is designed for staff caring for 0 – 5-year-olds and is appropriate to the age of the children being cared for. As young children can be less able to articulate and express themselves, they are more dependent on adults to recognise the signs that something is wrong and take appropriate action.

TPA staff will receive additional EYFS specific training online, in addition to the annual whole-school safeguarding training, as will DSLs. They are supported to put training into practice through:

- Additional policies such as intimate care policy, which balances the safeguarding of the children and the protection of staff and relevant risk assessments
- Regular check-ins and reminders where necessary through bulletin emails
- Half termly forums, with safeguarding as the first agenda item
- Visit from Regional Directors and Head of EYFS

Additional Trust policies such as safer recruitment policy and Health and Safety policy further support safeguarding in the EYFS.