CHILD PROTECTION AND SAFEGUARDING POLICY

(INCLUDING SAFER RECRUITMENT, ALLEGATIONS AGAINST STAFF AND LOW-LEVEL CONCERNS)

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This policy sets out the child protection and safeguarding policy and procedures for SECAT.

Sections 2, 5.2, 6, 7.1, 7.3, 7.4, 7.8, 7.9, 7.10, 8, 8.1, 10, 14 and 15, and Appendices 3 and 4, set out areas where specific arrangements for each school should be included in the individual school policy appendix.

Date	Version	Summary of changes
September 2026	1.0	Policy substantially reviewed and updated for September 2026, based on The Key model policy and updated to reflect Keeping Children Safe in Education (KCSIE) 2026 and other relevant statutory guidance. Changes include updated safeguarding and online safety requirements; filtering and monitoring arrangements; use of AI; strengthened child-on-child abuse provisions; updated Trust and school safeguarding responsibilities and escalation arrangements; updated Trust DSL and LADO contact details; and review of school-specific safeguarding arrangements and appendices.

Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Ben Stickley	benstickley@secat.co.uk
Deputy DSL	Debbie Trumble Terry Dignam	debbietrumble@secat.co.uk terrydignam@secat.co.uk
Local authority designated officer (LADO) Southend Childrens Services Threshold Guidance (SSP) – Right Help, Right Service, Right Time – Making Childrens Lives better | Safeguarding Southend Partnership	Local Authority Designated Officer (LADO)	01702 534539 lado@southend.gov.uk
Chair of Trust Board	Emma Hawker	emmahawker@secat.co.uk
Channel helpline		020 7340 7264

1. Aims

The Trust aims to ensure that:

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

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2023), and the Academy Trusts: governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to The Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our Trust and its schools to take positive action to deal with particular disadvantages affecting pupils with certain protected characteristics (where we can show it's proportionate). This includes the duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence; homophobic, biphobic or transphobic bullying or racial discrimination
- Operation Encompass statutory guidance, which explains that the police must notify any relevant education establishment of any incidents involving domestic abuse

- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

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

Please refer to the school policy appendix for locally agreed multi-agency procedures that have been put in place by the 3 safeguarding partners referenced in section 3.

3. Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases,

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

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, Trustees, Academy Committee Governors and governance professionals across our Trust and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The Trust and its schools play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support

- What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (KCSIE), in full and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the online / e-safety policy and the safeguarding response to children who go missing from education/who are absent from education
- Be aware of the Trust's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
  - Drug taking and/or alcohol misuse
  - Unexplainable and/or persistent absences from education
  - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
  - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online

- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 4 of this policy outlines in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

Please refer to individual school policy for details of the local DSL. The Trust DSL is Ben Stickley.

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

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

When the DSL is absent, the deputy DSLs will act as cover.

If the DSL and Deputy DSL(s) within a school are not available, safeguarding concerns should be escalated in accordance with the school's safeguarding arrangements, including to an appropriately trained member of the senior leadership team and, where necessary, to a Trust DSL.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Make sure that staff have appropriate Prevent training and induction
- Act as a lead practitioner for the local authority

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school

The full responsibilities of the DSL and deputies are set out in their job description.

5.3 The board of Trustees

The board will:

- Facilitate a Trust-wide approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure that all staff who work directly with children read at least Part 1 of Keeping Children Safe in Education (KCSIE) and those staff who do not work directly with children read Part 1 of KCSIE.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the CEO and headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and each school's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead or, link Trustee to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that each school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils
- Ensure the Trust and schools have appropriate cyber security systems in place
- Ensure that the Trust and schools have appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Ensuring that reviews are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team.
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the Trust and schools in meeting these standards
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within a whole-school approach to safeguarding and related policies
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
    - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors). Appendix 3 of this policy covers this procedure
    - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The CEO will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher where appropriate (see appendix 3).

The chair of the board of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the CEO where appropriate (see appendix 3).

All Trustees and Academy Committee Governors will read Keeping Children Safe in Education in its entirety.

5.4 The headteachers and CEO

The headteachers and CEO are responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
- Are informed of our systems that support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

5.5 Virtual school heads

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

VSHs should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

6. Confidentiality

Please refer to the school policy for their approach to confidentiality and data protection with respect to safeguarding.

- Timely information-sharing is essential to effective safeguarding

- Arrangements should be in place setting out the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
    - The DSL should consider that:
        - Parents or carers should normally be informed (unless this would put the victim at greater risk)
        - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be

appropriate to share any information with the new school or college in advance of a child leaving

Confidentiality is also addressed in this policy with respect to record-keeping in section 18, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for early help for a child who:

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Please refer to the school policy for making a referral, as per the arrangements put in place by the 3 safeguarding partners.

https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

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

We will ensure that staff have sufficient understanding and use of English to ensure the well-being of children in their care. For example, to keep records in English, liaise with other agencies in English, be able to summon emergency help, and understand instructions, for example about the safety of medicines or food hygiene.

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

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

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

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

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

Please refer to the school policy for details of local procedures.

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

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

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

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Please refer to the school policy for details of local procedures for early help assessments.

Referral

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority should make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Please refer to the school policy for details of local procedures for referral and escalation.

7.5 If you have concerns about extremism

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

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

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

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

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

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

7.6 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

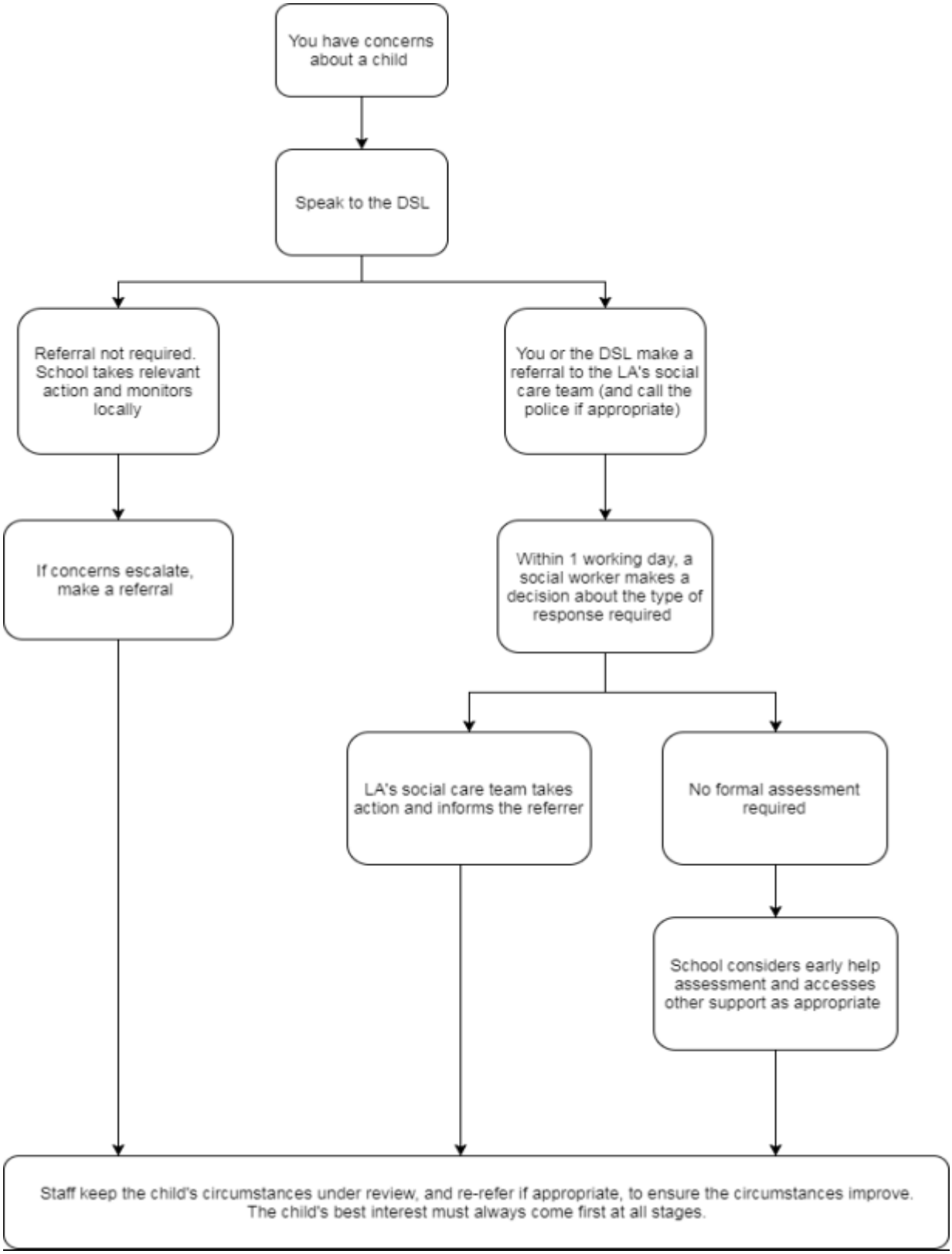
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



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

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

If the concerns/allegations are about the CEO, speak to the Chair of Trustees.

The headteacher/CEO/chair of Trustees will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the Headteacher, the concern should be reported to the CEO. Where the concern relates to the CEO, or there is a conflict of interest in reporting the matter to the CEO, it should be reported directly to the Local Authority Designated Officer (LADO).

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

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh”, “part of growing up”, or “boys being boys”, as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils.

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys’ perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

See appendix 4 for more information about child-on-child abuse.

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

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Please refer to the school policy appendix for the school's procedures for recording, investigating and dealing with allegations, and supporting victims, perpetrators and any other children affected.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong

- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

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

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

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Making or sharing of nudes and semi-nudes

This approach is based on guidance from the UK Council for Internet Safety and Department of Science, Innovation and Technology for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

Please refer to the school policy appendix for details of local procedures for referring an incident to the police.

Recording incidents

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes: What it is

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

Pupils also learn the strategies and skills needed to manage:

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

This policy on the making or sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

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

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

7.10 Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Please refer to the individual school policy appendix for details of the school's reporting systems for pupils.

8. Online safety and the use of mobile technology

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

To address this, our Trust aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our schools are a mobile phone-free environment by default
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Educate the whole school community on doxing, which is the action or process of searching for and publishing private or identifying information about a particular individual on the internet, typically with malicious intent

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

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

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

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyberbullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the Trust/school's ICT systems and use of their mobile and smart technology

- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Carry out an annual review of our filtering and monitoring effectiveness. This will be conducted by the member of the school's senior leadership team with responsibility for filtering and monitoring, with the support of the DSL and IT support
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

Please refer to the school policy for details of local policies and approach to online safety and mobile phone use.

The below section summarises our approach to mobile phone use for Early years providers.

Staff use and personal phones

Mobile phones and smart technology are part of everyday life for most children, parents, and staff members, so early years providers must clearly communicate their policy on the appropriate use of any devices in their setting. Mobile phone use should be covered in staff training during the induction process and policies should be reviewed regularly in the light of changing technologies. Any mobile phone policy must address the use of personal phones at work and could include the following points.

- Personal mobile phones should be either turned off or on silent and not accessed during working hours.
- Mobile phones can only be used on a designated break and this must be away from the children.
- Mobile phones should be stored safely in staff lockers or another designated area at all times during working hours.
- No personal device is allowed to be connected to the nursery Wi-Fi at any time.
- During outings staff can only use mobile phones belonging to the nursery.
- Photographs must not be taken of the children on any personal phones or any other personal information storage device. Only nursery-owned devices can be used to take photographs or videos.
- Staff must not use personal mobile phones to communicate with parents/carers or give out their personal mobile numbers or email addresses.
- Staff who bring personal mobile phones into the provision must ensure that there is no inappropriate or illegal content on them.
- The early years setting is not responsible for the loss, damage, or theft of any personal mobile device.
- All members of staff should remain vigilant and report any concerns to the setting's manager or designated safeguarding lead (DSL). Parents and staff should be informed of the complaints procedure and staff made aware of the whistleblowing procedure.
- If a member of staff breaches the mobile phone policy, action will be taken in line with the staff code of conduct and allegations policy.
- If a member of staff is thought to have illegal content on a mobile phone or have committed a criminal offence using a personal device or mobile phone, the police will be contacted and the LADO (Local Authority Designated Officer) will be informed.

Use of setting's mobile phones and devices

In addition to personal mobile phones, early years providers must also consider the safe use of any devices owned by the setting. Mobile phones and tablets can be valuable resources for taking photographic and video images of pupils for teaching and learning purposes, to record progress or to celebrate achievement. However, early years providers must set out a clear policy to ensure the appropriate use of any nursery devices and this should be used in conjunction with the e-safety and acceptable use IT policies. It could cover the following areas.

- The setting's mobile phones or tablets must only be used by members of staff for work purposes.
- The setting's devices will not have any social media or messaging apps on them.
- Managers must ensure any apps downloaded onto nursery devices are age and content appropriate for the children or staff using them.
- Passwords or passcodes for nursery devices must not be shared or written down and will be changed regularly.
- Mobile phones and devices belonging to the setting will always be used in accordance with the acceptable IT use policy and activity may be monitored for safeguarding reasons and to ensure policy compliance.
- During outings, staff will only use mobile phones belonging to the setting wherever possible.
- Parental permission must be obtained on joining the setting for the use of photographs or videos of children and consent should be sought every 12 months.
- Any images or videos of children will be stored securely and deleted when no longer required.
- Nursery devices must not be taken home with staff and must remain secure at the setting when not in use.

Parents and visitors
To protect children in the early years, most settings do not allow parents or visitors to use their mobile phones on the premises. Visitors should be informed of the policy before they visit or on arrival and this can be reinforced by signs. Members of staff should challenge visitors if they have concerns about their use of mobile phones or other devices and inform the manager or DSL of any breaches of policy.
Parents should also be advised that children cannot bring into the setting any devices that may take photographs or videos, such as phones or smart watches, to ensure that everyone is safeguarded and to protect personal property from loss or damage.

8.1 Artificial intelligence (AI)

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

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

The Trust will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the Trust. Our Trust/school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

Please refer to the school policy appendix for procedures that are in place for dealing with safeguarding concerns related to AI – for example where nude or semi-nude images that are AI-generated have been made or shared.

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

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

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

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

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

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

We offer extra pastoral support for these pupils. This includes:

Please refer to the school policy for details of local procedures for extra pastoral support for these pupils.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO. The school will consider extra pastoral support and attention for these children and ensure any appropriate support for communication is in place.

11. Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

12. Young carers

The Trust recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

13. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

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

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

14. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of local authority children's social workers and relevant virtual school heads

Please refer to the school policy for details of the designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

15. Pupils who are lesbian, gay or bisexual

The Trust recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See individual schools' behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

Any concerns should be reported to the DSL.

Please refer to the individual school policy appendix for details of the pastoral support that is offered to these pupils.

16. Pupils who are questioning their gender

16.1 Supporting pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. The Trust will ensure that children and their families are aware that, while the Trust will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach. The DSL will lead in these cases.

16.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

16.3 Considering requests for support with social transition

The Trust will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex (“social transition”), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the Trust and a child’s parents/carers have been involved (as set out in Keeping Children Safe in Education).

In making decisions about supporting social transition, the Trust will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school’s evaluation of the welfare and best interests of the child and other children. The Trust will make decisions in line with the following principles:

- The Trust has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child’s request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child’s wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The Trust will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the Trust may need to review its original decision and will involve the DSL in doing so.

16.4 Rules on single-sex spaces

Pupils are not allowed into toilets, changing rooms, showers or designated for the opposite biological sex, with no exceptions.

16.5 Rules on single-sex sports

The Trust may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The Trust can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

17. Complaints and concerns about school safeguarding policies

17.1 Complaints against staff

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

17.2 Other complaints

Please refer to the Trust's Complaints Policy for further guidance.

17.3 Whistleblowing

Please refer to the Trust's Whistleblowing Policy for further guidance.

18. Record-keeping

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

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

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child and should only be accessed by those who need to see it.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

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

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

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

- **The first 5 days** of the start of a new term

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

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

18.1 Local record-keeping arrangements

- Details of local recording keeping arrangements can be found in the Trust's Retention Policy.

19. Training

19.1 All staff

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils

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

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

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

Volunteers will receive appropriate training, if applicable.

19.2 The DSL and deputies

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

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

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

19.3 Trustees and Academy Committee Governors

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the CEO may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher they receive training in managing allegations for this purpose.

As the chair of trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the CEO they receive training in managing allegations for this purpose.

19.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the Trust will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

19.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

The headteacher will hold an approved qualification at level 3 or above and at least half of all other staff must hold at least an approved level 2 qualification. We will make sure that children are adequately supervised, especially whilst eating, and decide how to use staff to ensure children's needs are met. We will inform parents and/or carers about how staff are organised, and, when relevant and practical, aim to involve them in these decisions. Children will usually be within both sight and hearing of staff and always within sight or hearing.

20. Monitoring arrangements

This policy will be reviewed annually by the CEO, in conjunction with DSLs. At every review, it will be approved by the full board of Trustees.

21. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- AI
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children

- Privacy notices
- Whistleblowing

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

Appendix 1: types of abuse

Abuse is 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 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.

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

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

Emotional abuse may involve:

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

Sexual abuse 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
- 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.

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

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

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

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

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

1. Safer Recruitment

The Trust is committed to safeguarding and promoting the welfare of children and expects all staff, volunteers, contractors and others working on behalf of the Trust to share this commitment.

The Trust operates robust safer recruitment arrangements to help ensure that individuals appointed to work with or alongside children are suitable to do so and to minimise the risk of unsuitable individuals gaining access to children.

Recruitment and selection will be undertaken in accordance with:

- this Child Protection and Safeguarding Policy;
- the Trust's Recruitment and Selection Policy;
- *Keeping Children Safe in Education* (KCSIE); and
- relevant employment, safeguarding and equality legislation.

All staff involved in recruitment and selection will receive appropriate safer recruitment training and support to ensure they understand their safeguarding responsibilities throughout the recruitment process.

The Trust's safer recruitment arrangements include:

- safe and appropriate advertising of vacancies;
- robust application and shortlisting procedures;
- scrutiny of employment history and references;
- appropriate interview and assessment processes;
- verification of identity, qualifications and employment history;
- completion of all required pre-employment and safeguarding checks;
- accurate recording of statutory checks on the Trust's Single Central Record (SCR); and
- continued vigilance regarding safeguarding and suitability throughout employment or engagement.

2. Advertising

All recruitment advertising will make clear:

- the Trust's commitment to safeguarding and promoting the welfare of children;
- that appropriate safeguarding and pre-employment checks will be undertaken;
- the safeguarding responsibilities of the role, including the extent to which it involves contact with children; and
- whether the role is exempt from the Rehabilitation of Offenders Act 1974 and relevant amendments to the Exceptions Order.

Where a role is exempt, applicants will be informed that certain spent convictions and cautions are protected and do not need to be disclosed and, where disclosed, cannot lawfully be taken into account.

3. Application Forms

The Trust's application process will:

- state that it is an offence to apply for a role involving regulated activity with children where the

applicant is barred from engaging in such activity; and

- provide access to the Trust's Child Protection and Safeguarding Policy and policy relating to the recruitment of ex-offenders.

- CVs may supplement, but will not replace, a fully completed application form where the Trust requires an application form as part of its safer recruitment process.

4. Shortlisting

Shortlisting will normally be undertaken by at least two people.

- Those undertaking shortlisting will:

- identify and consider inconsistencies in the information provided;

- identify gaps in employment and consider the reasons given for those gaps; and

- identify any other areas requiring further exploration as part of the selection process.

Shortlisted candidates will be required to complete a self-declaration covering any relevant criminal record or other information that may affect their suitability to work with children.

This may include information relating to:

- relevant criminal history;

- inclusion on the children's barred list;

- prohibition from teaching;

- relevant criminal offences committed outside the UK, in accordance with the law applicable in England and Wales;

- relevant involvement with the police or children's social care;

- disqualification from providing childcare; and

- relevant overseas information.

Candidates will be required to confirm that the information they have provided is accurate and complete.

As part of the Trust's safeguarding due diligence, an online search may also be undertaken in respect of shortlisted candidates to identify publicly available information that may require further exploration. Candidates will be informed where such searches form part of the recruitment process.

Any information identified through a self-declaration or online search will be considered fairly, proportionately and in accordance with relevant legislation. Where appropriate, matters will be discussed with the candidate during the recruitment process.

5. References and Employment History

References will normally be obtained before interview so that any concerns or discrepancies can be explored with the referee and, where appropriate, with the candidate during interview.

The Trust will:

- not accept open references, such as those addressed "To whom it may concern";
- obtain references directly from the referee rather than relying on the applicant to provide them;
- not accept references from family members
- ensure electronic references originate from a legitimate source;
- verify relevant information directly with referees where necessary;

- seek a reference from the candidate's current employer, completed by an appropriately senior person;
- where the referee is school-based, seek confirmation from the headteacher or principal, as appropriate, regarding the accuracy of information relating to disciplinary investigations;
- obtain verification of the most recent relevant period of employment where the candidate is not currently employed;
- where the candidate is not currently working with children, seek a reference from the relevant employer from the last occasion on which they worked with children;
- where the candidate has not previously worked with children, seek an appropriate reference from their current employer, education setting or training provider;
- clarify vague, incomplete or insufficient information with the referee;
- establish the reason for leaving the candidate's current or most recent employment;
- compare information contained in the application with information provided through references; and
- resolve any material discrepancies or safeguarding concerns satisfactorily before confirming an appointment.

6. Interview and Selection

The selection process will assess both the candidate's suitability for the role and their suitability to work with children.

- Interviewers will, where relevant:
- explore gaps in employment;
- explore frequent changes in employment or location;
- question inconsistencies identified through the application, references or other recruitment checks;
- explore matters identified through a candidate's self-declaration or online search; and
- consider any other safeguarding concerns relevant to the candidate's suitability to work with children.
- A clear written record will be maintained of significant safeguarding information considered during the selection process and the rationale for relevant decisions

7. Pre-Appointment Vetting Checks

All offers of employment or engagement will be conditional upon satisfactory completion of the appropriate pre-employment and safeguarding checks.

Required checks will be recorded on the Trust's Single Central Record. Supporting evidence will be retained on personnel records where appropriate and in accordance with statutory requirements, data protection legislation and the Trust's records retention arrangements.

7.1 New Staff

Before appointment, or as soon as practicable where legislation permits, the Trust will undertake the checks required for the particular role. These may include:

- verification of identity;
- an enhanced DBS check;
- a children's barred list check where the role involves regulated activity;
- verification of the individual's right to work in the UK;
- verification of relevant professional qualifications;
- prohibition from teaching checks where applicable;
- section 128 checks where applicable;
- checks relating to childcare disqualification where required;
- appropriate overseas checks where the individual has lived or worked outside the UK; and
- confirmation of the individual's mental and physical fitness to undertake the responsibilities of the role.

Where a copy of a DBS certificate is retained, it will not normally be retained for longer than six months. The Trust may retain a record that the check was undertaken, the outcome and the resulting recruitment decision.

Evidence relating to right-to-work checks will be retained in accordance with statutory requirements.

7.2 Barred List Checks

A separate barred list check will be undertaken where required, including where:

- a newly appointed member of staff or volunteer is due to begin regulated activity before their DBS certificate is available; or
- legislation otherwise requires a separate barred list check.

No individual who is barred from regulated activity with children will be permitted to undertake regulated activity.

7.3 Overseas Checks

Where a candidate has lived or worked outside the UK, the Trust will consider what additional checks are appropriate and available.

These may include:

- overseas criminal record information; and
- for teaching positions, information from an overseas professional regulatory authority concerning sanctions, restrictions or other information relevant to the individual's suitability to teach.

Where equivalent information cannot be obtained, the Trust will consider what additional information, risk assessment or safeguards are necessary before appointment.

7.4 Section 128 Checks

Where applicable, the Trust will check whether an individual appointed to a relevant management position is subject to a section 128 direction prohibiting or restricting participation in the management of an independent school, academy or free school.

Relevant management positions may include, but are not limited to, senior Trust roles (e.g. CEO, CFOO, DCOO), headteachers and deputy or assistant headteachers.

7.5 Childcare Disqualification

Where required under the Childcare Act 2006 and Childcare (Disqualification) Regulations 2018, the Trust will ensure that appropriate checks and declarations are completed.

Where the Trust determines that an individual falls outside the scope of the regulations, a record of that assessment will be retained where appropriate, including relevant risk considerations, control measures and professional advice obtained

8. Regulated activity

For the purposes of safer recruitment and DBS requirements, regulated activity will be determined in accordance with current legislation and statutory safeguarding guidance.

This may include individuals who, on a relevant basis:

- teach, train, instruct, care for or supervise children;
- provide advice or guidance relating to children's physical, emotional or educational wellbeing;
- drive a vehicle used solely for transporting children;
- undertake intimate or personal care;
- provide healthcare; or
- undertake relevant overnight activity.

These requirements apply to both paid and unpaid roles.

9. Existing staff and volunteers

In certain circumstances, the Trust will carry out all relevant checks on existing staff or volunteers as if the individual were a new member of staff or volunteer. This will apply where:

- there are concerns about an existing member of staff's or volunteer's suitability to work with children;
- an individual moves from a role that does not involve regulated activity to one that does; or
- there has been a break in service of 12 weeks or more.

The Trust will make a referral to the Disclosure and Barring Service (DBS) where an individual has harmed, or poses a risk of harm to, a child or vulnerable adult and:

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

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

10. Agency and Third-Party Staff

The Trust will obtain written confirmation from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that the Trust would otherwise be required to undertake.

The Trust will also verify that the individual presenting themselves for work is the same person in respect of whom the checks have been completed

11. Contractors

The Trust primarily engages contractors through an approved contractor agency. The contractor agency is responsible for ensuring that all required safer recruitment and pre-engagement checks have been completed before an individual is deployed to work within a Trust school or setting.

This will include, as appropriate to the role:

- verification of identity;
- the appropriate level of DBS check, including an enhanced DBS check and barred list information where the individual will be undertaking regulated activity;
- appropriate employment and/or suitability references;
- right to work checks; and
- any other relevant safeguarding or pre-engagement checks required for the work being undertaken.

The Trust will obtain appropriate assurance from the contractor agency that the required checks have been completed and that the individual is suitable to undertake the work for which they are being engaged.

The relevant information will be verified and recorded on the Trust's Single Central Record (SCR), where required. The Trust will **not retain copies of DBS certificates or references for contractors**.

The school will also verify the identity of the contractor on arrival and ensure that the individual presenting for work is the same person in respect of whom the checks and assurances have been provided.

11.1. One-off or Directly Engaged Contractors

Where a contractor is engaged directly by the Estates Team or an individual school, rather than through the approved contractor agency, responsibility for ensuring that the appropriate safeguarding checks have been completed will rest with the Estates Team or school engaging the contractor.

HR and the relevant school must be notified in advance, as appropriate, to enable the necessary checks to be verified and the SCR updated before the contractor commences work.

The responsible person must ensure that:

- the contractor's identity is verified;
- the **original DBS certificate** is inspected where a DBS check is required;
- the level and type of DBS check is appropriate for the nature of the work, including whether barred list information is required;
- any required references or other suitability assurances have been obtained and verified;
- any additional safeguarding checks required for the engagement have been completed; and
- the relevant checks are accurately recorded on the Trust's SCR, where required.

The Trust will **not retain copies of the contractor's DBS certificate or references**. These will be verified for the purpose of confirming suitability and completing the required SCR record only.

Where a contractor does not have the appropriate level of safeguarding clearance, they must not undertake regulated activity or be permitted unsupervised access to children.

The level of checking and supervision required will be determined by the nature of the work, the frequency and duration of the engagement, the level of contact with children and whether the activity constitutes regulated activity.

All contractors remain subject to the Trust's safeguarding arrangements, site procedures and expectations regarding conduct while working within a Trust school or setting.

12.Trainee and Student Teachers

Where applicants undertaking initial teacher training are salaried by the Trust, all necessary checks will be carried out.

Where trainee teachers are fee-funded, the Trust will obtain written confirmation from the relevant training provider that the necessary checks have been completed and that the trainee has been assessed by the provider as suitable to work with children.

Where required by legislation, this will include checks to establish whether an individual is disqualified under the Childcare Disqualification Regulations 2018 and Childcare Act 2006.

13. Volunteers

The Trust will:

- never leave an unchecked volunteer unsupervised or permit them to undertake regulated activity;
- obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity;
- undertake a risk assessment when deciding whether to obtain an enhanced DBS check without barred list information for volunteers who are not engaging in regulated activity, and retain a record of that assessment;
- obtain references for volunteers before they are recruited; and
- where required by legislation, undertake appropriate checks to establish whether an individual is disqualified under the Childcare Disqualification Regulations 2018 and Childcare Act 2006.

Where the Trust determines that an individual falls outside the scope of the Childcare Disqualification Regulations and a check is therefore not undertaken, a record of the assessment will be retained. This will include an evaluation of any risks, the control measures put in place and any advice sought.

14. Trustees, Members and Academy Committee Governors

All Trustees, Academy Committee Governors and Members will undergo an enhanced DBS check without barred list information.

Where a Trustee, Academy Committee Governor or Member is undertaking regulated activity, an enhanced DBS check with barred list information will be obtained.

The Chair of the Board will have their DBS check countersigned by the Secretary of State.

All proprietors, Trustees, Local Governors and Members will also be subject to the following checks:

- a section 128 check to establish whether they are prohibited from participating in management under section 128 of the Education and Skills Act 2008;
- verification of identity;
- verification of their right to work in the UK; and
- any other checks considered necessary where they have lived or worked outside the UK.

15. Staff Working in Alternative Provision Settings

Where the Trust places a pupil with an alternative provision provider, written confirmation will be obtained from the provider that it has undertaken the appropriate safeguarding checks on individuals working within the provision that the Trust would otherwise be required to carry out.

16. Adults Who Supervise Pupils on Work Experience

When organising work experience, the Trust will ensure that appropriate policies and procedures are in place to protect children from harm.

The Trust will also consider whether barred list checks are required for individuals who supervise a pupil under the age of 16 during work experience.

This will be determined according to the specific circumstances of the placement, including:

- the nature of the supervision;
- the frequency of the activity being supervised; and
- whether the activity constitutes regulated activity.

17. Pupils Staying with Host Families

Where a Trust school arranges for a pupil to be provided with care and accommodation by a host family to whom they are not related, for example as part of a foreign exchange visit, the Trust will request enhanced DBS checks with barred list information in respect of the relevant individuals.

Where a Trust school is organising an overseas hosting arrangement and host families cannot be checked in the same way, the school will work with its partner school or organisation overseas to ensure that equivalent safeguarding assurances are undertaken before the visit

Appendix 3: Allegations and Concerns Relating to Staff

Section 1: Allegations That May Meet the Harm Threshold

This section applies where it is alleged that a current member of staff, including a supply teacher, trainee teacher, volunteer or contractor, has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children. This includes behaviour that may have taken place both inside and outside of the workplace.

Where there is any doubt as to whether a concern meets the harm threshold, the Trust will consult the Local Authority Designated Officer (LADO).

The Trust will respond to allegations promptly, fairly and consistently, ensuring that children are effectively safeguarded while appropriate support is also provided to the individual who is the subject of the allegation.

Case Manager

A **Case Manager** will be identified at the earliest opportunity and will oversee the management of the allegation in accordance with this policy and relevant Trust procedures.

The Case Manager will normally be the Headteacher, CEO or CFOO, or the Chair of Trustees where the Headteacher or CEO is the subject of the allegation.

The procedures within this appendix will be applied proportionately, using appropriate professional judgement and having regard to the circumstances of each case.

Where an allegation relates to an incident that occurred while an individual or organisation was during the course of there employment or appointment providing activities for children on behalf of the Trust, or the allegation calls into question the suitability of the individual to work with children, the Trust will follow its safeguarding procedures and may inform the LADO if threshold is met. Other circumstances may also result in referral to the LADO if considered appropriate by the case manager.

Suspension Pending Resolution of an Allegation

Suspension will not be an automatic response to an allegation. Suspension will only be considered where:

- there is reason to believe that a child or other children may be at risk of harm; or
- the allegation is sufficiently serious that, if substantiated, there may be grounds for dismissal.

Before deciding to suspend an individual, the Trust will consider whether the risks can reasonably be managed through alternative arrangements.

Depending on the circumstances and assessment of risk, alternatives may include:

- redeployment within the Trust so that the individual has no direct contact with the child or children concerned;
- arranging for another adult to be present when the individual has contact with children;
- temporarily allocating alternative duties that do not involve unsupervised access to children;
- moving the child or children to another class or arrangement where they will not come into contact with the individual, making clear that this is not a punishment and consulting parents or carers as appropriate; or
- temporarily redeploying the individual to another role or Trust location.

Where appropriate, the Case Manager will seek advice from the Trust's Designated Senior Lead for safeguarding (Trust DSL), HR adviser(s) and the LADO, as well as the police and local authority children's social care where they are involved.

Where immediate suspension is considered necessary, the Case Manager will agree and record the rationale with the Trust DSL. The record will include the alternatives considered and the reasons they were considered unsuitable.

Written confirmation of suspension will be provided to the individual at the point of suspension or immediately therafter. The individual will be provided with a named Trust contact and appropriate contact details as part of this notification.

Definitions of Outcomes

The following definitions will be used when determining the outcome of an allegation:

- **Substantiated**: there is sufficient evidence to prove the allegation.
- **Malicious**: there is sufficient evidence to disprove the allegation and evidence of a deliberate act to deceive or cause harm to the person who is the subject of the allegation.
- **False**: there is sufficient evidence to disprove the allegation.
- **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. This does not imply guilt or innocence.
- **Unfounded**: there is no evidence or proper basis to support the allegation being made.

Procedure for Dealing with Allegations

Where an allegation may meet the harm threshold, the Case Manager will:

- undertake basic enquiries in accordance with local procedures to establish the relevant facts and determine whether there is any foundation to the allegation;
- discuss the allegation with the LADO to consider its nature, content and context and agree the appropriate course of action;
- establish, in consultation with the LADO, whether further enquiries are required and whether the police and/or local authority children's social care should be involved;
- inform the individual who is the subject of the allegation of the concerns and likely course of action as soon as reasonably practicable following consultation with the LADO and, where applicable, the police or children's social care;
- consider whether suspension or other temporary safeguarding arrangements are necessary;
- consider the welfare of any other children who may be affected; and
- ensure that decisions, actions and the rationale for them are appropriately recorded.

There may be circumstances where the police need to be contacted before consultation with the LADO, for example where there is an immediate risk to children or evidence of a possible criminal offence. In these circumstances, the LADO will be informed as soon as practicably possible afterwards.

Where the police and/or children's social care are involved, information will only be shared with the individual who is the subject of the allegation to the extent agreed with those agencies.

Where concerns arise regarding the welfare of other children within the community or the individual's family, the Case Manager will discuss these concerns with the DSL and undertake an appropriate risk assessment. The DSL will make a referral to children's social care where necessary

Where No Further Action Is Required

Where it is determined that no further action is required, the Case Manager will:

- record the decision and the reasons for it;
- agree with the Trust DSL & LADO what information should be provided to the individual and by whom; and
- agree any appropriate follow-up action in relation to both the individual and the person who raised the allegation.

Where Further Action Is Required

Where further action is necessary, the Trust will take the steps agreed with the LADO and, where appropriate, liaise with the police and/or local authority children's social care.

This may include action under the Trust's relevant employment procedures.

Support for the Individual

The Trust will provide appropriate support to an individual who is the subject of an allegation or safeguarding concern.

A named representative will be identified to keep the individual appropriately informed regarding the progress of the case and to consider what other support may be required.

Information and Support for Parents and Carers

Parents or carers of the child or children involved will normally be informed of the allegation as soon as reasonably possible where they are not already aware, subject to agreement with the police and/or children's social care where those agencies are involved.

Parents and carers will be kept appropriately informed about the progress of the case insofar as it relates to their child. Confidential information relating to the member of staff will not be disclosed.

Where confidentiality restrictions apply to allegations against teachers while an investigation is ongoing, parents and carers will be informed of those restrictions and advised to seek legal advice if they wish to pursue their removal.

Referral to the Disclosure and Barring Service

The Trust will make a referral to the Disclosure and Barring Service (DBS) where the statutory criteria for referral are met, including where it is considered that an individual has engaged in conduct that harmed, or is likely to harm, a child or otherwise poses a risk of harm to a child.

Early Years Provision

For early years provision, the Trust will notify Ofsted of allegations of serious harm or abuse by any person living, working or looking after children at the premises, whether the alleged harm or abuse occurred on or away from the premises.

The Trust will also notify Ofsted of any action taken in relation to the allegation.

Notification will be made as soon as reasonably practicable and always within 14 days of the allegation being made.

Interim Prohibition Orders

Where the Trust becomes aware that the Secretary of State has made an interim prohibition order in respect of a teacher, the individual will be suspended from teaching immediately pending the outcome of the Teaching Regulation Agency's investigation.

Police Investigations

Where the police are involved, the Trust will, wherever possible, ask at the outset of the investigation that the police seek consent from relevant individuals for statements and evidence to be shared with the Trust for use in any subsequent disciplinary process.

Supply Teachers, Trainee Teachers and Contracted Staff

Where an allegation or safeguarding concern relates to an individual who is not directly employed by the Trust, including a supply teacher, trainee teacher or contracted member of staff supplied through an agency, safeguarding responsibilities are shared between the Trust and the employing agency or organisation.

In addition to the Trust's standard procedures:

- the Trust will not cease using an individual solely because a safeguarding concern has been raised without first establishing the facts and liaising with the LADO to determine an appropriate outcome;
- the Case Manager will discuss with the agency whether it is appropriate for the individual to be suspended or temporarily redeployed while the matter is considered;
- the agency will be appropriately involved in the process;
- the Trust will lead on gathering the information required and providing this to the LADO as appropriate;
- information sharing arrangements will be established so that any previous concerns or allegations known to the agency can be appropriately considered; and
- the agency's HR representative or equivalent will be invited to relevant meetings where appropriate.

Agencies used by the Trust will be informed of the Trust's process for managing safeguarding allegations and concerns.

Teacher training providers will be expected to follow equivalent arrangements to those applicable to supply agencies.

Timescales

The Trust will manage allegations as promptly and effectively as possible. Where reasonably practicable, the Trust will work towards the following timescales:

- cases where it is immediately clear that an allegation is unsubstantiated or malicious should normally be resolved within one week;
- where the allegation does not require formal disciplinary action, appropriate action should normally be taken within three working days; and
- where a disciplinary hearing is required and no further investigation is necessary, it should normally be held within 15 working days.

These timescales are objectives rather than absolute deadlines. Where they cannot reasonably be achieved, the Trust will progress the matter as promptly as circumstances allow.

Action Following a Criminal Investigation or Prosecution

Following the conclusion of a criminal investigation or prosecution, the Case Manager will discuss with the Trust DSL whether any further action, including disciplinary action, is required and how this should proceed. This may also be in discussion with the LADO, however LADO can not advise on Trust disciplinary matters.

Any decision will take account of information provided by the police and/or local authority children's social care.

Conclusion of a Substantiated Allegation

- Where an allegation is substantiated and:
- the individual is dismissed;
- the Trust ceases to use their services;

- the individual resigns; or
- the individual otherwise ceases to provide services,
- the Trust will make a referral to the DBS where the statutory referral criteria are met for consideration of whether the individual should be included on the barred lists.

Where the individual is a member of teaching staff, the Trust will also consider whether referral to the Teaching Regulation Agency is appropriate.

Return to Work Following Suspension

Where an individual who has been suspended is permitted to return to work following the conclusion of the case, the Case Manager will consider how their return can best be facilitated.

This will include consideration of any support required and how the individual's future contact with the child or children involved should be managed where they remain at the school.

Unsubstantiated, Unfounded, False or Malicious Allegations

Where an allegation is determined to be unsubstantiated, unfounded, false or malicious, the Case Manager, DSL and/or LADO, as appropriate, will consider whether any further action is required.

Where there is an indication that the child or person who raised the allegation may require support, or that the allegation may have represented a cry for help, consideration will be given to whether a referral to local authority children's social care is appropriate.

Where an allegation is shown to have been deliberately invented or malicious, the school will consider whether any appropriate action should be taken in respect of the person who made the allegation.

Confidentiality and Information Sharing

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

The Case Manager will seek advice from the LADO, police and/or local authority children's social care, as appropriate, regarding:

- who needs to know about the allegation;
- what information may appropriately be shared;
- how speculation, leaks or gossip should be managed;
- how parents and carers should be informed about their confidentiality obligations;
- whether any information should be provided to the wider school or Trust community to reduce speculation; and
- how any press or media interest should be managed.

Information will only be shared on a need-to-know basis and in accordance with safeguarding requirements and applicable data protection legislation.

Record Keeping

The Case Manager will maintain clear and appropriate records for cases that meet the harm threshold. Records will be held securely on the individual's confidential personnel file for the duration of the case.

Where an allegation is found following investigation to be **malicious or false**, records relating to the allegation will be removed from the individual's personnel file unless the individual consents to their retention.

For other allegations, the record will include:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- details of actions taken, decisions reached and the outcome; and

- a record of whether the information may be referred to in any future employment reference.

Where appropriate and in agreement with the police and/or local authority children's social care, a copy of the relevant record will be provided to the individual.

Records will be retained at least until the individual reaches normal pension age or for 10 years from the date of the allegation, whichever is longer.

Employment References

When providing employment references, the Trust will:

- not refer to allegations that have been found to be false, unfounded, unsubstantiated or malicious, including repeated allegations where all have resulted in such findings; and
- include substantiated safeguarding allegations where appropriate, ensuring that information provided is factual and does not include opinion.

Learning Lessons

Following a **substantiated allegation**, the Case Manager will review the circumstances with the Trust DSL and LADO to identify whether improvements should be made to Trust procedures or safeguarding practice.

Where relevant, this will include consideration of:

- the decision to suspend;
- the duration of any suspension;
- whether suspension was justified; and
- where an individual was subsequently reinstated, whether a similar future investigation could reasonably be managed without suspension.

For other cases, the Case Manager will consider the circumstances and determine whether any improvements to Trust or school practice should be made.

Non-Recent Allegations

Allegations of abuse may be reported regardless of how long ago the alleged abuse occurred.

Where a child makes a non-recent allegation, the Trust will report the matter to the LADO in accordance with local authority procedures.

Where an adult reports to the Trust that they were abused as a child, the individual will be advised to report the matter to the police.

Section 2: Concerns That Do Not Meet the Harm Threshold

This section applies to concerns, including allegations, relating to members of staff, supply teachers, trainee teachers, volunteers and contractors that do not meet the harm threshold set out in Section 1.

Concerns may arise through, for example:

- a suspicion;
- a complaint;
- a safeguarding concern or allegation raised by another member of staff;
- a disclosure made by a child, parent or other adult, either inside or outside the school; or
- information identified through pre-employment vetting checks.

The Trust recognises the importance of responding to all such concerns promptly and appropriately in order to safeguard children and maintain a strong culture of safeguarding.

Definition of a Low-Level Concern

A **low-level concern** is any concern, regardless of how small it may appear, that an adult working in or on behalf of the Trust or one of its schools may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; **and**
- does not meet the harm threshold or is otherwise not considered serious enough to require referral to the LADO.

The term "low-level" does not mean that the concern is insignificant or should be disregarded. Examples may include, but are not limited to:

- being overly friendly with children;
- having favourites;
- taking photographs of children using a personal mobile phone;
- engaging with a child one-to-one in a secluded area or behind a closed door; or
- humiliating pupils.

Sharing Low-Level Concerns

The Trust recognises the importance of maintaining a culture of openness, trust and transparency in which staff feel confident to raise concerns about behaviour that may be inappropriate or inconsistent with expected professional standards.

The Trust and its schools will support this culture by:

- ensuring that staff understand expected standards of behaviour and can distinguish appropriate behaviour from concerning, problematic or inappropriate behaviour;
- encouraging staff to report low-level concerns in accordance with this policy;
- encouraging staff to self-refer where they believe their own actions may have fallen below expected standards;
- addressing unprofessional behaviour at an early stage and supporting individuals to correct it;
- responding to concerns sensitively, proportionately and promptly; and
- using concerns to identify potential weaknesses within school or Trust safeguarding arrangements.

The individual school safeguarding appendix sets out the local arrangements for raising low-level concerns and the respective roles of the Headteacher and DSL.

Responding to Low-Level Concerns

Where a low-level concern is raised through a third party, the Headteacher/CEO/CFOO will establish the relevant facts where necessary. This may include speaking:

- directly with the person who raised the concern, unless it was raised anonymously;
- with the individual to whom the concern relates; and
- with any relevant witnesses.

The Headteacher/CEO/CFOO will consider the information available, categorise the nature of the behaviour and determine what further action, if any, is required in accordance with the Staff Code of Conduct and relevant Trust procedures.

The Headteacher/CEO/CFOO will be the ultimate decision-maker in relation to low-level concerns dependant on line management chains, although they may consult and work collaboratively with the school or Trust DSL and seek HR advice where appropriate.

The individual school safeguarding arrangements provide further detail about the local process for reporting and responding to low-level concerns.

Recording Low-Level Concerns

All low-level concerns will be recorded in writing.

- Records will include:
- details of the concern;
- the context in which it arose;
- any action taken; and
- the rationale for decisions and actions.

Records will be:

- treated confidentially;
- stored securely and managed in accordance with the Data Protection Act 2018, Data (Use and Access) Act 2025 and UK GDPR;
- reviewed to identify potential patterns of concerning, problematic or inappropriate behaviour; and
- retained at least until the individual leaves employment with the school.

Where a pattern of behaviour is identified, the Trust will determine an appropriate course of action.

This may include action under the Trust's disciplinary procedures or, where the pattern of behaviour develops to the point that the harm threshold may be met, referral to the LADO.

Where a low-level concern relates to a supply teacher or contractor, the individual's employer or agency will be notified so that any wider pattern of inappropriate behaviour can be identified.

Low-Level Concerns and References

- Low-level concerns will not ordinarily be included in employment references.
- They will only be included where:
- the concern, or group of concerns, has met the threshold for referral to the LADO and has subsequently been substantiated; and/or
- the concern relates to matters that would ordinarily and properly be included within an employment reference, such as misconduct or poor performance.

Appendix 4: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on part 1 of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's advice for education settings.

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

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

Sexually motivated incidents

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

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

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

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

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

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

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

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

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them

- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

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

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

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

Children who are absent from education

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk of becoming missing from education. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

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

If a pupil is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

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

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

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

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

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse (including harassment and violence)

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

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

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

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI
- Upskirting, which is a criminal offence, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

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

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

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

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

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

Police must notify a school/education setting of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

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

Homelessness

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

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

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

So-called 'honour-based' abuse (including FGM and forced marriage)

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

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

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

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

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

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs **Terrorism** is an action that:

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

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

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures.

Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his 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: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his 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: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes 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)

Consent is about having the freedom and capacity to choose. Consent to sexual activity 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 child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

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

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

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

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

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

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

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

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

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action

- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

Please refer to the individual school policy appendix for details of the school procedures.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

Please refer to the individual school policy appendix for details of the school procedures.