Safeguarding and Child Protection Policy

including
Allegations against Staff and Low-level Concerns

This Policy has been adopted and approved by Oxlip Learning Partnership and is to be used by all members of the Trust.

History of Document

Version No.	Author/ Owner	Date Written / Reviewed	Date Ratified by Full Board	Comments	Next Review Date
V1	HR Manager/ Safeguarding Lead	Aug-2024	13-Sept-2024	Trust-wide Policy implemented with effect from 1-Sept-2024	Annually and in line with KCSiE.
V2	DoHR / Safeguarding Lead	July 2025	1-Sept-2025	Updated in line with KCSIE Sept 2025	Summer 2026 and in line with KCSIE
V2a	DoHR	Nov 2025	n/a	Updated to include clarification at section 15 and App. C S1.g	Summer 2026 and in line with KCSIE
V3	DoHR / Safeguarding Lead	Aug 2026	4-Sept-2026	Updated in line with KCSiE Sept 2026 – see pages 61-66	Summer 2027 and in line with KCSiE
V3a		Oct 2026	14-Oct-2026	Further updates and clarification in line with KCSiE – see page 61	Summer 2027 and in line with KCSiE

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Please note that for the purposes of this policy:

- **the term "pupil or student" refers to any learner on roll at a Trust school**

Important contacts

For Designated School safeguarding staff (Designated Safeguarding Leads (DSL) and Deputy DSLs) refer to the school's local child protection procedures.

Role/organisation	Name	Contact details
Trust Safeguarding Lead	Nigel Shaddick	01473 277243
Safeguarding Trustee	Sue Hayter	01473 277243
DSL - Bacton Primary School	Angela Thomas	01449 781367
DSL - Britannia Primary School	Emma Campbell	01473 728566
DSL - Cedars Park Primary School	Will Main	01449 778230
DSL - Copleston High School	Henry Palmer	01473 277240
DSL - Mendlesham Primary School	Angela Thomas	01449 766224
DSL - Rose Hill Primary School	Luke Hyland	01473 727552
DSL - Stowupland High School	Chris Sim	01449 674827
Designated Officer for Suffolk - (formerly Local Authority Designated Officer)	LADO (Suffolk)	0300 123 2044 LADO@suffolk.gov.uk
Channel helpline	-	020 7340 7264
NSPCC helpline	-	0808 800 5000

1. Safeguarding Statement and Aims

Safeguarding Statement

Oxlip Learning Partnership (the Trust) believes in supporting all aspects of children and young people's development and learning, and keeping children safe. We understand that emotional and social aspects of learning create a foundation for all academic learning. If a child has not been supported to understand, express and resolve their feelings, they may not have the ability to share with other children, resolve the small conflicts that arise in day-to-day classroom life, or concentrate on learning. Their frustrations may cause a range of antisocial, disruptive, overly compliant or withdrawn behaviours.

All staff who work at the Trust will ensure that:

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

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

In order to ensure children are adequately protected, the Trust will ensure that:

- All DSLs, Deputy/Alternate DSLs and the Trust named Safeguarding Lead and the named Safeguarding Trustee will attend specialised training appropriate for their positions, which will be updated at least every two years (records of this training will be kept by the Trust safeguarding lead).
- All schools will provide new staff, teaching and support, paid and volunteers with up to date safeguarding training through, for example, the NSPCC, Success in Schools Ltd (Andrew Hall) or that is endorsed by Suffolk Safeguarding Partnership. A log of staff safeguarding training is kept by the DSL. **Prior to their first day, as part of their induction, all new staff will receive a copy of this policy, their school's local child protection procedures and behaviour policy, as well as Part 1 and Annex B of Keeping Children Safe in Education (September 2025).**
- The new staff member and the DSL will sign to evidence that the induction has been completed. The Trust will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part 1 of Keeping Children Safe in Education (September 2025). Whenever this policy is reviewed and updated, the Trust will ensure that all staff receive a copy; each school will insist that staff sign a register to confirm that they have read and understood the current version.
- The DSL provides staff with regular updates, which may be via email as well as during staff meetings, PD days and through safeguarding displays. In addition, all staff must complete online Prevent training and copies of certificates are kept by the DSL. All members of staff will be advised to ensure that their behaviour or actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This is also highlighted in the staff code of conduct.
- All children, young people and their families have access to their school's local child protection procedures via the school's website.

The Trust's safeguarding policy and individual school's local child protection procedures are reviewed on an annual basis by the Trust, in consultation with Principals.

Safeguarding 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
- Pupils are taught about safeguarding, including online safety.

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
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Principals should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- 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
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers
- What to do if you're worried a child is being abused
- Guidance for safer working practice
- Suffolk Safeguarding Partnership

This policy complies with the Trust's funding agreement and articles of association.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing 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 included 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 A 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 A 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 a police area in the LA area.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way.

When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) 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 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 (SEN) or disabilities or health conditions (see section 9)
- are young carers
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations - for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of FGM, sexual exploitation, forced marriage or radicalisation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs;
- are looked after or previously looked after (see section 11)
- are missing or absent from education for prolonged periods and/or repeat occasions
- 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, Local Board members and Trustees and is consistent with the procedures of the Suffolk Safeguarding Partnership.

The Trust's policy and procedures also apply to extended school and off-site activities.

As a Trust, we contribute to multi-agency working in line with statutory guidance Working Together to Safeguard Children. We work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. We allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, statutory assessments.

The Trust and our schools play a crucial role in preventative education. This is in the context of a whole-trust 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 the schools':

- 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 female genital mutilation (FGM) and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable.

5.1 Trust Responsibilities

In addition to this policy, the Trust will:

- monitor the effectiveness of safeguarding through termly safeguarding reviews in every Trust school (SCR; use of CPOMS/MyConcern for pupil records; allegations and action points)
- provide an external review (biannual as a minimum)
- provide a whistleblowing policy
- provide a Safer Recruitment Policy
- provide every DSL with an annual safeguarding/child protection update (prior to the autumn term), reflecting changes in statutory requirements **and current issues**
- keep a log of all referrals made to the local authority designated officer (LADO) by Trust schools
- liaise with local authority lead professionals for safeguarding, Suffolk Safeguarding Partnership, Ofsted, the ESFA and other agencies as required.

5.2 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, in full and review this guidance at least annually
- Sign a declaration, or confirm electronically, at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents 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:

- The Trust's 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 safety policy, and the safeguarding response to children who go missing from education
- Be aware of the trust's unauthorised absence procedures and children missing education procedures
- The early help process (sometimes known as the common assessment framework) 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 children may experience prejudice-based harm including racism, faith-based prejudice and other forms of discrimination. These experiences may affect a child's welfare, wellbeing, mental health and ability to seek help
- 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.

Section 18 and appendix D of this policy outline in more detail how staff are supported to do this.

5.3 The Designated Safeguarding Lead (DSL)

All schools in the Trust have a named DSL whose details are in the school's local child protection procedures. The DSL is a member of the senior leadership team with the authority to take lead responsibility for child protection and wider safeguarding in their 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, named deputies will act as cover. If the DSL and deputy/deputies are not available or absent, cover arrangements will be in place. Details are in the school's local child protection procedures.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children

- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and to support members of staff who make such referrals directly
- Have a good understanding of the filtering and monitoring systems and processes in place at their school
- Have a good understanding of harmful sexual behaviour
- Make sure that staff have appropriate Prevent training and induction.

The DSL will also:

- Keep the Principal informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Ensure that cover is provided for the role when they are absent from the school
- 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 (see Appendix E).

5.4 The Designated Teacher (CLA)

All our schools have a designated teacher whose details are in the school's local child protection procedures. They must have appropriate training and the relevant skills and experience to work with local authorities to promote the educational achievement of registered pupils who are looked after.

On commencement of sections 4 to 6 of the Children and Social Work Act 2017, they will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. A previously looked after child remains potentially vulnerable and all staff should have the skills, knowledge and understanding to keep them safe.

5.5 The Board of Trustees

The Trust board will:

- Facilitate a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront 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 Safe in Education (KCSIE) and those who 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 Principals to account for the implementation of this policy and the implementation of the school's local child protection measures
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our schools' local multi-agency safeguarding arrangements

- Appoint a named safeguarding trustee to monitor the effectiveness of this policy in conjunction with the Trust personnel and an external safeguarding provider for quality assurance. 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 the Trust 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/school has appropriate cyber security systems in place
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
    - Making sure that the leadership team and all 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 should are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school 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 the 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 leadership team and all staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
    - 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, volunteers and contractors). Appendix C 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 Trust's Chief Executive Officer (CEO) will act as the 'case manager' in the event that an allegation of abuse is made against a Principal, where appropriate (see Appendix C).

The Trust will be supported in its work by the Local Advisory Board (LAB) of each school.

Trustees and Local Board members will all read Keeping Children Safe in Education and record this on Governor Hub.

Section 15 of this policy has information on how Trustees and Local Board members are supported to fulfil their role.

5.6 Local Advisory Boards

Governors on local advisory boards will review the school-specific elements of the policy after the trust level policy has been reviewed and approved (the Local Procedures).

They will also hold the Principal to account for the implementation of the policy.

We will appoint a member of each local governing body to act as the governor responsible for safeguarding, to liaise with the school DSL on local safeguarding issues and report to the safeguarding trustee.

5.7 The Principal

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

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of the Trust and school's systems which 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 and the school's local child protection procedures to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that responsibility for record keeping is clear and that all Trust formats are followed;
- Ensuring that all staff undertake appropriate safeguarding and child protection training, including online safety training
- Ensuring the content of the training is updated regularly
- 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 C)
- 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, mobile phones and cameras in the setting.

5.8 Virtual School Heads

Local Authority 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, SENCOs, social workers, mental health leads and others.

6. Confidentiality

The following process and principles apply when sharing information within our schools or trust, and with the 3 safeguarding partners and other agencies as required:

- Under section 16LA of the Children Act 2004, our schools have a statutory duty to share information with other relevant organisations if we consider that we hold information that is relevant to safeguarding or promoting a child's welfare, or if we receive a request for relevant information from another organisation/practitioner

- We will share information with other organisations/practitioners if it is considered that sharing may help the recipient's relevant functions, including assessing need, making a decision, providing support or taking action to safeguard and promote the welfare of a child
- Timely information sharing is essential to effective safeguarding. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of a child, and it should not prevent the school from fulfilling its legal duty
- 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
- Thresholds for sharing: The duty to share information is not limited to situations where a child is in immediate danger or meets child protection thresholds. Relevant information must also be shared where it is relevant to safeguarding and promoting a child's welfare, including where concerns relate to early help, prevention and unmet need
- In extremely limited circumstances, we will not share information where we consider that doing so would be more detrimental to the child than not sharing. Examples of the extremely limited circumstances include:
    - The child being placed at immediate risk of harm by the information being shared
    - Interfering with a police investigation, such that the consequence is likely to be of greater detriment to a child, including placing another child at increased risk of harm
    - Contravention of the Family Procedure Rules, or order of the Family Court or Family Division of the High Court
- Any decision not to share information to avoid greater detriment to the child will be rare, and will be carefully considered, with the welfare of the child central to the judgement.
- The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Data protection must not be treated as a reason to withhold information where the statutory duty applies
- Consent and confidentiality: When sharing information for safeguarding purposes under the section 16LA statutory duty, the common law duty of confidentiality does not apply. The statutory guidance warns against seeking consent to share information if the statutory duty dictates it must be shared, as this presents children and families with a "false choice". Instead, the school will identify the appropriate lawful basis from the outset and will explain what will happen rather than seeking permission where consent is not required or would be inappropriate for safeguarding purposes, unless doing so would place the child at greater 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 and would conflict with our statutory duty
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There's no definitive answer, but staff must recognise that the statutory duty to share relevant information overrides a victim's request for complete confidentiality
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other pupils and staff. Under the guidance, a decision to withhold information should only occur in extremely limited circumstances where sharing it would be more detrimental to the child than not sharing it
- 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 remains: 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
- We will only use information received by the trust under the information sharing duty for the specified purposes
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (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 C.

7. Recognising Abuse and Taking Action

All staff are expected to be able to identify and recognise all forms of abuse, neglect 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 abuse, violent and/or harmful behaviours
- Is bereaved
- Is showing signs of being drawn into antisocial or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- 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
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending

Staff, volunteers, Local Board members and Trustees 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 children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 7.2) immediately if you make a referral directly.

To make a referral to the local authority contact Customer First on 0808 800 4005, (open 24 hours a day). Members of the public and professionals can use this line. For professionals wishing to make a referral, the Multi-Agency Referral Form (MARF) can be found here: https://cypportal.suffolk.gov.uk/web/portal/pages/home

If you are concerned a child is at immediate risk of serious harm, please call **999**.

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

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. All schools have a recording form/process for safeguarding concerns and the school's local child protection procedures will say where these can be found
- Sign and date the write-up and pass it on to the DSL without delay. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL immediately 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.

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

The Department for Education's 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 D. All staff should speak to the DSL and follow local safeguarding procedures with regard to any concerns about FGM.

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 disclose, they should also discuss the case with the DSL and involve 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 **age 18 or over** appears to have been a victim of FGM, should speak to the DSL and follow our local safeguarding procedures.

Details of support and further guidance can be found on Suffolk Safeguarding Partnership website: https://www.suffolksp.org.uk/types-of-abuse#fgm

7.4 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' at 7.5). Inform the DSL or deputy as soon as is 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 Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff, Local Board members and Trustees 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.

7.5 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)

The diagram on page 15 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not 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 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 support staff in liaising with other agencies and setting up an interagency 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 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. The Trust's Safeguarding Provision Map can be found at Appendix F (page 56).

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.

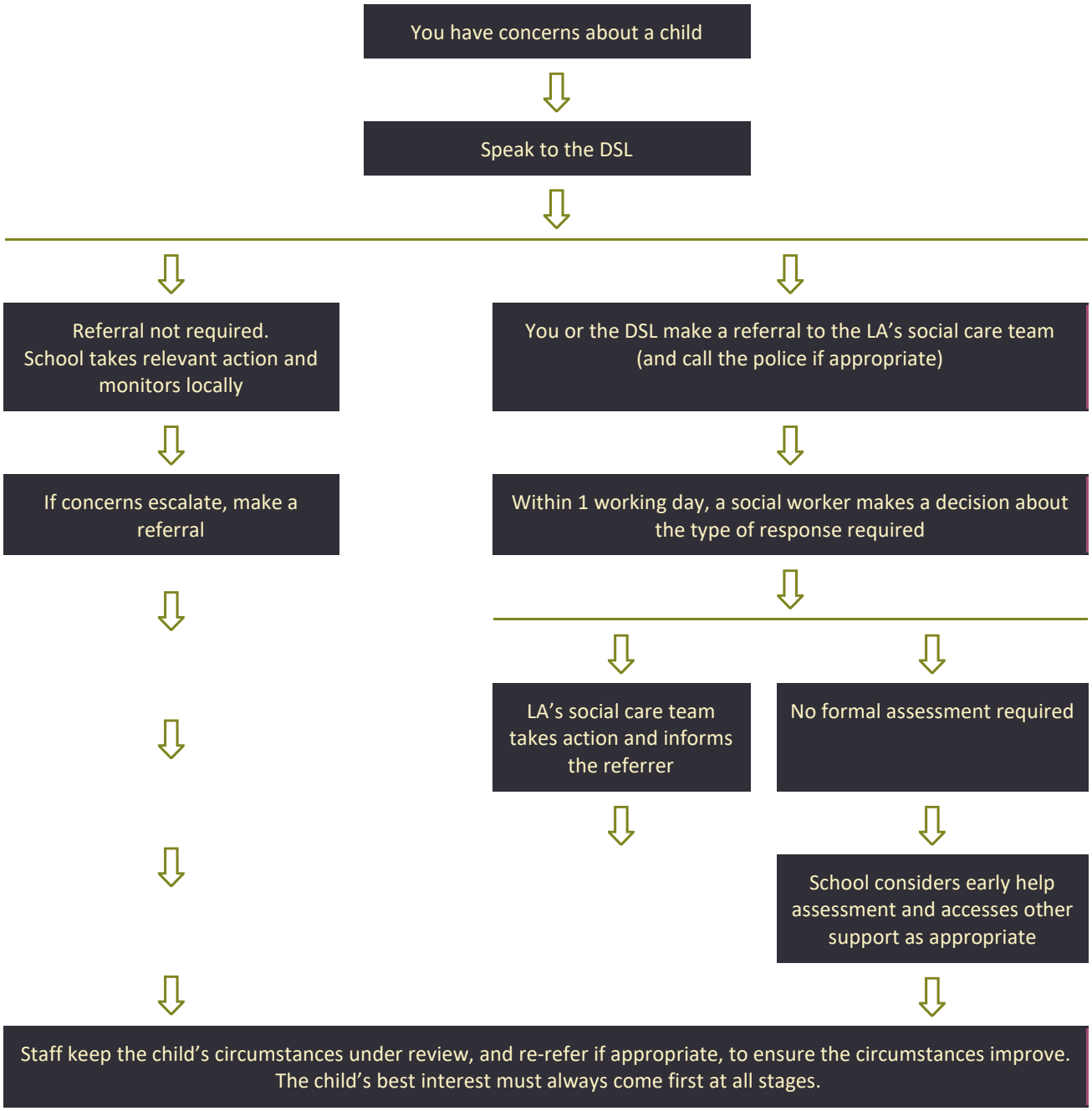
The local authority will make a decision within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available,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

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

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action. The line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

Please see the procedure flow chart on the next page

Procedure if you have concerns about a child's welfare (no immediate danger)
(Note - if the DSL is unavailable, this should not delay action. See section 7.5 for what to do.)



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 7.5. 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.

7.7 Concerns about a staff member, supply teacher, volunteer or contactor

If an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children (meeting the harm threshold), speak to the Principal without delay. If the concerns / allegations are about the Principal, speak to the Trust's Chief Executive Officer or Director of HR.

If you have a low-level concern, no matter how small, about a member of staff (a concern that does not meet the harm threshold), report this to the Principal in a timely manner. The Principal will be the ultimate decision-maker. However, depending on the nature of the low-level concern, the Principal may wish to consult with the designated safeguarding lead (DSL) and take a more collaborative decision-making approach.

The Principal/CEO/Trust Director of HR will then follow the procedures set out in Appendix C, if appropriate. Details of the Principal, CEO and the Trust's HR Manager will be in the school's local child protection procedures.

Where appropriate, schools with Early Years provision will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Appendix C for more detail).

If you have concerns about a member of the Trust's central team, speak to the Chief Executive Officer. If you have concerns about the Chief Executive Officer, speak to the Chair of the Board of Trustees. They will then follow the procedures set out in Appendix C, 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 Principal, report it directly to the CEO or Director of HR. Where you believe there is a conflict of interest in reporting a concern or allegation to the CEO or Director of HR, report it 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.

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 D 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.

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or person who made the report is in need of help or may have been abused by someone else, or the report may have been a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate
- Shown to be deliberately false or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it in line with the school's behaviour policy

7.9 Making or sharing of nudes and semi-nudes

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 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 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 D 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 special educational needs)
- 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 imagery is under 13

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

If none of the above apply then the DSL, in consultation with the Principal 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
If it is necessary to refer an incident to the police, this will be done through a police community support officer, local neighbourhood police or by dialling 101.

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

Curriculum coverage
Pupils are taught about the issues surrounding the making or sharing of nudes and semi-nudes as part of our Relationships and Sex Education and computing curriculum. Details of age-appropriate teaching in relation to the making or sharing of nudes and semi-nudes can be found in each school's local safeguarding procedures.

Teaching covers the following in relation to the sharing of nudes and semi-nudes:
- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the 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.

7.11 Serious Violent Crime

All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these.

Links to guidance:

- Advice to schools and colleges on gangs and youth violence
- Criminal exploitation of children and vulnerable adults: county lines

7.12 The use of 'reasonable force'

There are circumstances where it is appropriate for staff in schools to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed.' The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

7.13 Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside school. All staff, but especially the DSL (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children, and consideration of wider environmental factors and situations outside their families that are present in a child's life that are a threat to their safety and/or welfare. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence. Children's social care assessments should consider such factors, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

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, Trustees and Local Board members;
- 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 mobile phone-free environments by default;
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The four 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 child-to-child 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 cyber-bullying, ensuring pupils are encouraged to do so, including where they are 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 at least once each academic year
- Educate parents/carers about online safety via our websites, 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, Trustees and Local Board members aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the 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 four 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 communities
- Carry out an annual review of our filtering and monitoring effectiveness. This will be conducted by the member of SLT responsible for filtering and monitoring in each school 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

Staff will not use personal mobile phones and laptops/tablets, or school equipment for personal use, in front of pupils, except in case of emergency.

Whenever possible, images of pupils will be recorded on equipment provided by the Trust (e.g. a school camera or iPad). However, if, in exceptional circumstances, personal equipment is used to record these images, staff will be mindful that they must be able to justify images of pupils in their possession.

Staff will take care when recording images that pupils are appropriately dressed and are not participating in activities that might bring the individuals, the school or the Trust into disrepute.

Staff will delete any recorded images of pupils from both the device and any cloud storage, as soon as they have been downloaded to the school's network.

Any personal devices used must not be set to automatically upload images to any shared platforms, e.g. Family Sharing. Images of pupils must be downloaded from designated school devices as soon as possible and the images deleted from the device. We will follow the Data Protection Act 2018 when taking and storing photos and recordings for use in the Trust. Please also refer to the Trust's data protection policy.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to schools' online safety policies which can be found on their websites.

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.

We recognise 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.

We will treat any use of AI to access harmful content or bully pupils in line with this policy and the schools' behaviour policy.

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

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents/carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents/carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents/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 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 special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. 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 disability 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 schools or colleges or the consequences of doing so.

We offer further pastoral support for pupils. Please see the individual school's SEND Information Report.

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 children's social workers and relevant virtual school heads.

Each school has appointed a designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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 our school's behaviour policy for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL.

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 the school's 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

Our schools 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 school 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 school 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 school 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 school 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 school 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 or showers designated for the opposite biological sex, with no exceptions.

16.5 Rules on single-sex sports

The school 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 school 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 safeguarding practices

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 C).

17.2 Other Complaints

For other complaints, please refer to the Trust's Complaints Procedure.

17.3 Whistleblowing

For whistleblowing, please refer to our whistleblowing policy.

18. Record-keeping

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

CPOMS recording is in place across the Trust.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded (in writing, on the CPOMS management information system). 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. Where a pupil is affected by a substantiated allegation against a member of staff, an appropriate record will be included on the pupil's safeguarding file.

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 using CPOMS.

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

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 a 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.

Safeguarding record-keeping arrangements are as follows:

- concerns are recorded electronically and any paper-based files are retained
- all paper-based safeguarding files are stored securely in a locked cabinet in the DSL's office
- only the DSL and key staff have access to the full electronic records
- files are retained for as long as the pupil is on roll at each school and, at secondary school, until the pupil reaches the age of 25
- Any safeguarding concern relating to sexual abuse will be retained until the pupil reaches the age of 75
- files are only available to staff who have the right or professional need to see them

Schools will share information with other agencies, such as the police or social services, when this is appropriate.

When a child for whom there is a child protection record leaves one of our schools, the DSL will inform the relevant social worker and send the child protection records to the receiving institution immediately. These will be transferred separately from the main pupil file, by secure transit and confirmation of receipt will be obtained and retained.

Receiving schools should ensure key staff such as DSLs and SENCos are aware as required. In addition to the child protection file, 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. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

If the name of the receiving institution is not known, the DSL will notify the child's social worker as a matter of urgency as soon as the child leaves or appears to be missing. In these circumstances, the child protection records will remain at the school until the child is known to have registered elsewhere.

When a child joins one of our schools and records from the previous institution indicate they have a child protection plan, the DSL will notify the local authority children's social care service immediately. When a child who is known to have child protection records joins one of our schools and no child protection records have been received from the previous school, the DSL will contact the DSL at that institution to request the records be sent immediately. This request will be

confirmed in writing and repeated if necessary. If they remain unavailable, the school will inform the Education Welfare Service.

In addition:

- Please refer to the Trusts records retention policy;
- Appendix B sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks;
- Appendix C sets out our policy on record-keeping with respect to allegations of abuse made against staff.

19. Training

19.1 All staff

All staff members will undertake safeguarding and child protection training prior to starting to ensure they understand and can identify signs of possible abuse, exploitation or neglect. At induction, further training on the school's local safeguarding procedures, systems and responsibilities will be provided. This will include whistle-blowing and online safety.

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 DSLs and deputies

The DSLs 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 Local Board Members

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

- Have the knowledge and information needed to perform their functions and understand their respective roles and 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 Trustee with responsibility for safeguarding may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Chief Executive Officer, they receive training in managing allegations for this purpose.

19.4 Recruitment – interview panels

At least one person conducting any interview for any post at the school 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 B 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.

20. Monitoring and Policy Review

The Trust's safeguarding policy will be reviewed **annually** and it will be approved by the Chief Executive Officer in consultation with the Trust's Safeguarding Lead, the Principals and the Trustee with responsibility for safeguarding. The Policy will be ratified at the first Full Board Meeting of the academic year.

21. Links with other policies

This policy links to the following Trust and/or school policies and procedures:

- Acceptable Use of IT and Internet
- Attendance
- Behaviour for Learning
- Curriculum
- Data Protection
- Designated Teacher for Looked-After and Previously Looked-After Children
- Equality
- Feedback, concerns and complaints
- First Aid
- Health and safety
- Local Child Protection Procedures (school specific)
- Online Safety
- Privacy Notices
- Record Retention Schedule
- Relationships, Sex and Health Education
- Safer Recruitment
- Special Educational Needs and Disabilities
- Staff Code of Conduct
- Supporting pupils with medical conditions
- Whistleblowing (employees)

The appendices on the following pages are based on the Department for Education's statutory guidance, Keeping Children Safe in Education (September 2026).

Appendix A: 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 cyberbullying), 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 a high level of violence, whether or not the child is aware of what is happening.

The activities may involve:

- Physical contact, including assault by penetration (for example rape or 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 (including via the internet).

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 B:

Safer Recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in a single central record (SCR). Schools maintain an SCR of their staff and the Trust maintains an SCR of central staff.

Copies of the checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

The Trust must also have access to a collated single central record for all schools.

B1. Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising
When advertising roles, we will make clear:

- Our trust's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms
Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

A copy of, or link to, our safeguarding and child protection policy and safer recruitment policy, including the employment of ex-offenders, is available on the Trust website.

Shortlisting
Our shortlisting process will involve at least two people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process. Where a search is carried out, it will be undertaken by the Trust Central Team and not by anyone on the interview panel. Any concerns may be discussed with the candidate at interview.

Seeking references and checking employment history
It is normal practice to take up references on shortlisted candidates prior to interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- References will be verified and checked to ensure they originate from a legitimate source
- Liaise directly with referees where information is vague or insufficient information is provided
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection
When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

B2. Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- New staff members will not be permitted to begin working in our EYFS provision until we have received the applicant's enhanced DBS certificate including barred list information
- Obtain a separate barred list check:
    - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
    - Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school

- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 6 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, principals and deputy/assistant principals.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated Activity is work that a barred person must not do. It means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Activity	**Frequency**
• Teaching, training, instructing, caring for, or supervising children • Providing advice or guidance on physical, emotional or educational wellbeing • (For paid workers) Doing any other paid work in school that provides an opportunity for contact with children	• Frequently (once a week or more), or • On more than 3 days in a 30-day period, or • Once at any time between 2am and 6am and with opportunity to have face-to-face contact with children
• Driving a vehicle only for children and their carers or supervisors	• Frequently (once a week or more), or • On more than 3 days in a 30-day period
Providing intimate or personal care, including: • Assisting with toileting, washing, bathing and dressing due to a child's age, illness or disability • Assisting with eating and drinking due to illness or disability • Providing health care (physical or mental health)	• Any time, even if only once
Moderating a public electronic interactive communication service (e.g. the school's social media platforms) which is likely to be used wholly or mainly by children	• Any time

The above applies to both paid staff and volunteers, aside from where stated '(For paid workers only)'.

Existing staff and volunteers

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

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

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

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

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

Agency and third-party staff

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

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at a Trust school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract).

This will be:

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

Also, before commissioning contractors, a company statement must be obtained providing confirmation that all relevant checks have been completed with dates, along with a copy of the company's safeguarding policy. If they do not have a Safeguarding Policy, that contractors attending our school sites understand the contents of the Trust Safeguarding and Child Protection Policy and will adhere to the requirements within.

We will obtain the DBS check for self-employed contractors, or request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school.

Where self-employed contractors such as music teachers or sports coaches are working in a school with pupils aged under 8, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Checking the identity and suitability of third party staff and visitors
All third party staff will be required to verify their identity to the satisfaction of staff.
If the visiting staff 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 and will be given the school's local safeguarding protection procedures.

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 LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite any speaker into the school 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.

Trainee/student teachers
Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out. Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children. In both cases, this includes checks to ensure that relevant individuals are not disqualified under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) Regulations 2018 and Childcare Act 2006.

Volunteers
We will:

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

Checks requested for individuals on work experience or on a work placement will be determined as above.

Volunteers will not be permitted to begin volunteering in our EYFS provision until we have received the applicant's enhanced DBS certificate including barred list information.

Members, Trustees and Local Board Members
All Members, Trustees and Local Board members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. The chair of the board of trustees will have their DBS check countersigned by the secretary of state.

The chair of the Trust Board will have their DBS check countersigned by the secretary of state.

All Members, Trustees and Local Board members will also have the following checks:

- Section 128 direction (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008);
- Identity;
- Right to work in the UK;

- Other checks deemed necessary if they have lived or worked outside the UK.

Alternative Provision

Where a Trust school places a pupil with an alternative provider, the school continues to be responsible for the safeguarding of that pupil, and will satisfy itself that the provider meets the needs of the pupil. The school will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform in respect of our own staff.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm. We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families (homestay)

Where a Trust school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people. Pupils should understand who to contact during a homestay should an emergency occur or a situation arise which makes them feel uncomfortable. Where a period of UK homestay lasts 28 days or more, for a child aged under 16 years of age (under 18 years of age if the child has disabilities), this may amount to private fostering (see below).

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

Private fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative, in their own home. A child is not deemed to be privately fostered if the person caring for and accommodating them has done so for fewer than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children. School staff should notify the DSL as soon as they become aware of private fostering arrangements. The school will then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. A link to comprehensive guidance on the circumstances in which private fostering may arise can be found here: Private Fostering – DfE statutory guidance

Appendix C:

Allegations of abuse made against staff (including low-level concerns)

Section 1: Allegations that may meet the harms threshold

This section of this policy applies to all cases in which 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 he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children - this includes behaviour taking place both inside and outside of school.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be the Principal, or the Chief Executive Officer where the Principal is the subject of the allegation, or the Chair of the Board of Trustees where the CEO is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

App. C. S1.a Suspension of the accused until the case is resolved

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

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

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

If in doubt, the case manager will seek views from the Director of HR and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

App. C. S1.b Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

App. C. S1.c Procedure for dealing with allegations

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

- Conduct basic enquiries and liaise with the Director of HR in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). **Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies**
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within one working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. The individual facing the allegation may wish to call the Trust's employee assistance programme on 0808 168 2143 or the Education Support Partnership, free on 08000 562 561 or visit their website at www.educationsupportpartnership.org.uk
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution (only in relation to their child - no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- Inform the CEO that you have made a referral to the designated officer at the local authority as soon as possible and complete the details required by the Trust.

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

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

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

Additional considerations for supply teachers, trainee teachers and all contracted staff
If there are concerns or an allegation is made against someone not directly employed by the Trust, such as a supply teacher, a trainee teacher or contracted staff member provided by an agency, the Trust shares the safeguarding responsibilities with the employment agency or business. We will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
- The school will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the local authority designated officer as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as set out for supply agencies.

App, C. S1.d Timescales (Guidance only)

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week;
- If the nature of an allegation does not require formal disciplinary action, we will instigate appropriate action within 3 working days;
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days;
- Further investigation and a subsequent hearing may take up to 25 working days

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

App. C. S1.e Specific Actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate;
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate;
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

App C. S1.f Confidentiality and information sharing

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

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

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

App C. S1.g Record-keeping

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

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

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved

- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate. An appropriate record will also be included on the safeguarding file of any affected pupil.

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

App. C. S1.h References

When providing employer references, we will:

- Not refer to any allegation that has been proven to be false, unsubstantiated, malicious or unfounded, or any repeated allegations which have been found to be false, unsubstantiated, malicious or unfounded;
- Include substantiated allegations, provided that the information is factual and does not include opinions.

App. C. S1.i Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer (LADO) to determine whether there are any improvements that we can make to the Trust's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

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

App. C. S1.j Non-recent allegations

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

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

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

Section 2: Concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

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

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

App. C. S2.a Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils.

App. C. S2.b Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately. Staff must share any low-level concerns with the Principal in a timely manner.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- Empowering staff to share any low-level concerns as per section 7.7 of this policy;
- Empowering staff to self-refer;
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised;
- Helping to identify any weakness in the school's safeguarding system

App. C. S2.c Responding to low-level concerns

If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

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

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

App. C. S2.d Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018, Data (Use and Access) Act 2025, and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority;
- Retained at least until the individual leaves employment at the school.

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

App. C. S2.e References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Dealing with Allegations or Concerns about an Adult Working with Children

Allegation or concern raised about a member of staff or adult

↓

1. Contact the Director of HR: 01449 708487 nhooper@oxlip.uk

2. Does it meet the harm threshold?

The harm threshold is met where it is alleged that an adult working (or volunteering) in the school 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 he or she 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* (see KCSIE Part 4)

Consider the questions below to help you decide the answer to this question:	**Please indicate**
How long has the adult or member of staff worked for you?	
Have there been any previous concerns raised?	
Is this a one-off or part of a pattern of behaviour?	
Has the member of staff previously been given advice in this area?	
Would an associated pattern of behaviour (if it exists) be seen by others? (How closely do they work with other colleagues?)	
Might this have been a planned action or event?	
Could this behaviour be inadvertent? What is the likelihood of this?	
Could this be the precursor to more concerning behaviour?	
Did it occur in a 'public' or 'private' place? Was this in school or out of school?	
If electronic devices are involved, have any relevant files been deleted and is there any evidence of this?	
If this relates to inappropriate language, what is the precise nature of the language used? How inappropriate is it? What was the context – where was this, and who were the listeners? Could this be seen as 'banter' or might it have more serious undertones?	

↓ Yes

Contact SCC LADO: 0300 123 2044
LADO@suffolk.gov.uk Inform the HR Manager

↓

The LADO will ask for specific information about the issue and confirm whether or not it meets the harm threshold. If it does, they will begin a formal process to manage the allegation. If it doesn't meet the threshold then they will record the information and advise you to treat the issue as a Low Level Concern. You will need to inform the staff member that LADO holds information on them.

↓ Not Sure

↲

↓ No

This is a Low Level Concern.
Consider carefully what action to take in response in consultation with the Director of HR.
Keep a record in a secure central file using the template form for this purpose.

Director of HR contact details:
01449 708487
nhooper@oxlip.uk

Appendix D:
Specific safeguarding concerns

D1. Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of 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.

D1.1 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

D1.2 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

D2. Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk.

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.

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.

D3. 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.

D4. Child sexual exploitation

Child sexual exploitation (CSE) is a form of 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.

D5. 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 schools have a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are 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 cyber-bullying, prejudice-based and discriminatory bullying)
- Discriminatory behaviour (including racism, faith-targeted abuse, and other prejudice-based incidents)
- 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 (pages 17-20) 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.

D6. Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The schools will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-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.

D7. 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) 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 domestic abuse 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.

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

- NSPCC-UK domestic-abuse signs symptoms effects
- Safelives: young people and domestic abuse

D8. Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO (www.nationalcrimeagency.gov.uk) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

D9. 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 to 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 children's social care.

D10. 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.

D10.1 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 (page 14) 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 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.

D10.2 Forced marriage Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

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.

D11. Preventing radicalisation

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

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

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

Terrorism is an action that:

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

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

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 charity 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 Facebook or X (Twitter);
- 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 7.4 (page 12) of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

D12. 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 may 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

D13. 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 LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information 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.

D14. Non-collection of children and Missing pupils

Our procedures for non-collection of children and missing pupils can be found in the schools' Local Child Protection Procedures document.

Appendix E:

Designated safeguarding lead – job description

An appropriate senior member of staff, from the school leadership team will be appointed to the role of designated safeguarding lead.

The designated safeguarding lead will take **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This person must have the appropriate status and authority within the school to carry out the duties of the post. This role carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy designated safeguarding leads

Any deputy designated safeguarding lead should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead; this lead responsibility should not be delegated.

Availability

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

To ensure continuity of safeguarding responsibilities, schools should implement robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances. Schools have the flexibility and discretion in how these arrangements operate, provided safeguarding responsibilities remain appropriately covered. Whenever the DSL is unavailable, there is a clear, reliable, and known arrangement in place so that concerns can be raised. This could, for example, include a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

E1. Managing referrals

The designated safeguarding lead is expected to:

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

E2. Working with others

The designated safeguarding lead is expected to:

- Act as a source of support, advice and expertise for staff
- Act as a point of contact with the safeguarding partners

- Ensure staff can access and understand the school's child protection and safeguarding policy and procedures (especially new and part time staff)
- Inform the Principal of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- As required, liaise with the case manager and the local authority's designated officer for child protection concerns in all cases where a member of school staff is involved
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and SENCos) on matters of safety, safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- Attend and contribute to child protection case conferences effectively when required to do so
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. This includes:
    - ensuring that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
    - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

E3. Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Safeguarding records should be clear, factual, and distinguish between observed concerns, professional opinion, and historic information.

Records should include:

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

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

Appropriate arrangements should be in place to ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-year moves.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term.

This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Where child protection files are transferred, the exporting school or college should include a clear, structured summary identifying current safeguarding concerns, relevant context, and any ongoing support needs.

Particular care should be taken to distinguish between current safeguarding concerns and historic information, ensuring that past issues are presented with appropriate context. For example, where a file

contains extensive historical information, a concise summary of current risk and relevant context is likely to support more effective safeguarding than the transfer of unstructured records alone.

Receiving schools and colleges should ensure that safeguarding information is reviewed by an appropriately trained member of staff so that key risks and needs are clearly understood. Safeguarding information should be used to support, not disadvantage, the child.

Where the receiving school or college considers that safeguarding information is unclear or incomplete, it should seek clarification where necessary to support effective safeguarding.

They should also ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named person with oversight for SEND in colleges, are aware as required. It will then be for the DSL to consider what other information should be shared with other relevant staff and when this should be shared.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives. It would be good practice for a conversation to take place at the appropriate and relevant points between the designated safeguarding leads at both settings, where there are issues or concerns to ensure information is being actively considered and acted upon.

E4. Raising awareness

The designated safeguarding lead should:

- Ensure each member of staff has access to and understands the Trust's safeguarding policy and school's child protection procedures, especially new and part time staff
- Ensure the Trust's safeguarding policy and the school's child protection procedures are known, understood and used appropriately
- Ensure the school's child protection procedures are reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Local Board regarding this
- Ensure the Trust's safeguarding child protection policy and the school's local procedures are available publicly and easily accessible to everyone in the school community
- Ensure that parents are aware that referrals about suspected abuse or neglect may be made, and the role of the school in this
- Link with the local safeguarding children board (LSCB) to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Be alert to the specific needs of children in need, those with special educational needs and young carers
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff

E.5 Training, knowledge and skills

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

processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

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

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

E6. Providing support to staff

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

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

E7. Understanding the views of children

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

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

E8. Holding and sharing information

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

- understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection laws, and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. 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 program etc.

E9. Other areas of responsibility

- Undertake safer recruitment training and support the school to follow best practice
- Monitor the single central record and ensure it complies with all relevant legislation
- Provide safeguarding reports to the local board
- Model best practice and uphold the principles of confidentiality and data protection at all times

Appendix F Updates and Amendments to this policy have been made in line with the following changes to KCSIE (Sept 2026)

POLICY SECTION	WHAT'S CHANGED? (FURTHER UPDATES IN OCTOBER 2026)	WHY?
Section 6	Expanded the confidentiality section to include your statutory information sharing duties as set out in the DfE's guidance.	To reflect updated statutory guidance regarding information sharing duties under section 16LA of the Children Act 2004.
Section 7.7	Separated the reporting processes for allegations meeting the harm threshold (report to Principal without delay) versus low-level concerns (report to Principal in a timely manner).	To provide more clarity over the reporting pathways for low-level concerns vs allegations that might meet the harm threshold, to reflect paragraph 516 of KCSIE 2026
Section 7.8	Added that the DSL must consider if a pupil who has made an unsubstantiated report of child-on-child abuse needs support, was abused for someone else or whether it was a cry for help. We've added that disciplinary action for malicious reports must align with the school's/trust's behaviour policy.	To reflect paragraph 489 of KCSIE 2026
Appendix C Low-level concerns	Added that staff must report low-level concerns to the Principal.	To reflect paragraph 516 of KCSIE 2026

POLICY SECTION	WHAT'S CHANGED? (UPDATED FOR SEPTEMBER 2026)	WHY?
Throughout	Removed all references to 'Annex A' of KCSIE	The DfE now requires all staff to read part 1 of KCSIE, and so has removed the condensed version of part 1
Throughout	Changed 'indecent images' to 'nude or semi-nude images'	To match the language in KCSIE 2026
Section 2	Updated the list of legislation and statutory guidance	To reflect the introduction of the Crime and Policing Act 2026, and add Operation Encompass
Section 3	Added 'AI-generated intimate images' to the definition of making or sharing nude and semi-nude images	To reflect paragraph 191 of KCSIE 2026
Section 5	Updated the definition of 'preventative education' to include racism	To reflect paragraph 158 of KCSIE 2026
Section 5.2	Updated to reflect that all staff must read at least part 1 of KCSIE in full	To reflect KCSIE 2026
	Added a note that staff should be aware that mental health can develop into safeguarding issues	To reflect paragraph 45 of KCSIE 2026

Appendix F: Updates and amendments to this policy for September 2026

POLICY SECTION	WHAT'S CHANGED? (UPDATED FOR SEPTEMBER 2026)	WHY?
	Added the expectation that all school staff are aware that children may experience prejudice-based harm	To reflect page 11 of KCSIE 2026 (para. 17)
	Added a note about the trust's unauthorised absence procedures	To reflect page 159 of KCSIE 2026
	Added a note on the process for community-based Family Help assessments	To reflect paragraph 13 of KCSIE 2026
	Added a list of safeguarding issues that can overlap and put children at risk of harm	To reflect paragraph 29 of KCSIE 2026
Section 5.3	Added the new expectation for DSLs to have cover arrangements in place in the event of their absence	To reflect paragraph 127 of KCSIE 2026
	Added a note updating the responsibilities of the DSL to include: • Ensuring that child protection files are kept up to date • Where children leave the school, ensuring their child protection file is transferred to the new school	To reflect pages 183 and 184 of KCSIE 2026
Section 5.5	Updated the responsibilities of the board of trustees / LGBs to include: • Ensuring the school has a policy in respect to the use of restrictive interventions • Ensuring the school has appropriate cyber security systems in place • Reviewing the effectiveness of filtering and monitoring systems at least once every academic year – as well as details on who should carry out these reviews	To reflect paragraphs 171 and 176 of KCSIE 2026
Section 6	Updated to include: • 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 • 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	To reflect paragraphs 139 and 148 of KCSIE 2026
Section 7	Included modern slavery as a form of abuse	To reflect paragraph 18 of KCSIE 2026
Section 7.6	Updated this section to include: • Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem • A list of warning signs that a pupil is struggling with their mental health • Details on what to do if a child is in danger, including numbers to call	To reflect paragraphs 46 to 48 of KCSIE 2026

Appendix F: Updates and amendments to this policy for September 2026

POLICY SECTION	WHAT'S CHANGED? (UPDATED FOR SEPTEMBER 2026)	WHY?
Section 7.7	Updated the entire section to include trainee teachers	To reflect para's 452 to 456 of KCSIE 2026
Section 7.8	Added 'misogyny/misandry' throughout this section, as well as references to misogynistic and misandrist ideology. The section now also includes 2 bullet points covering: • Recognising the intersection between misogyny/misandry and harmful sexual behaviour • Being alert to the prevalence of harmful online material related to misogyny/misandry, including misogynistic influencers Updated to include a note that for some (but not all) forms of child-on-child abuse, it is more likely that girls will be victims and boys perpetrators Updated staff training to include that staff are required to discuss with the DSL if they're concerned about a pupil being exposed to misogynistic or misandrist content	To reflect paragraphs 158 and 191 of KCSIE 2026 To reflect paragraph 191 of KCSIE 2026 To reflect paragraph 22 of KCSIE 2026
Section 7.9	Expanded section to include making and sharing of nudes and semi-nudes, including that all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response.	To reflect paragraph 527 of KCSIE 2026
Section 8	Updated the entire section to reflect that schools must ensure that their environment is mobile phone-free by default	To reflect paragraph 168 of KCSIE 2026
	Updated the 4 key categories of risk	To reflect paragraph 163 of KCSIE 2026
Section 8	Added the requirement for the member of SLT in charge of filtering and monitoring to review their approach annually (with the support of IT and the DSL)	To reflect paragraph 171 of KCSIE 2026
Section 10	Updated the risk of barriers when recognising abuse to include: • 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 The section also includes a note about extra pastoral support to be offered to pupils with SEND.	To reflect paragraphs 247 to 249 of KCSIE 2026
Section 11	Added a new section ('Pupils with medical conditions') which covers: • An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners • The procedures for making a safeguarding referral where an incident highlights that a child might be at increased risk of neglect, abuse, or exploitation due to their medical condition	To reflect paragraph 250 of KCSIE 2026

Appendix F: Updates and amendments to this policy for September 2026

POLICY SECTION	WHAT'S CHANGED? (UPDATED FOR SEPTEMBER 2026)	WHY?
Section 12	Added a new section ('Young carers') which covers: • The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing • That early identification is essential ensuring young carers receive support Note: with these 2 new sections, the numbering of sections in the rest of the model policy has changed (e.g. section 13 is now section 15, and so on)	To reflect paragraph 246 of KCSIE 2026
Section 15	Split section 15 into sections 15 and 16 Section 15 covers pupils who are lesbian, gay or bisexual, while section 16 covers pupils who are questioning their gender. It also acknowledges that these pupils may be vulnerable to discriminatory bullying	To reflect paragraphs 251 to 282 of KCSIE 2026
	Updated to note that a child being lesbian, gay or bisexual is not a risk factor in itself	To reflect paragraph 251 of KCSIE 2026
Section 16	This new section covers schools' responsibilities when it comes to pupils who are questioning their gender. It includes: • That schools must take a cautious approach when supporting pupils who are questioning their gender • Involving parents/carers in cases of pupils questioning their gender • Considering requests for support with social transition • Rules on single-sex spaces as well as single-sex sports Note: with this new section, the numbering of the sections for the rest of the model policy has changed (e.g. section 16 is now section 17, and so on)	To reflect paragraphs 252 to 282 of KCSIE 2026
Appendix A: types of abuse	Expanded the definition of abuse to include 'child to parent abuse'/'care giver abuse'	To reflect paragraph 24 of KCSIE 2026
	Updated the list of kinds of emotional abuse to include verbal abuse	To reflect paragraph 26 of KCSIE 2026
	Expanded the definition of sexual abuse (physical contact) to include penetration with an object, as well as a note that sexual abuse can take place online	To reflect paragraph 27 of KCSIE 2026
Appendix B: safer recruitment policy **pre-appointment vetting checks**	Updated instructions for obtaining a separate barred list check to include: • Newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available • Individuals that have worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than 3 months prior to their appointment to the school	To reflect paragraph 325 of KCSIE 2026

Appendix F: Updates and amendments to this policy for September 2026

POLICY SECTION	WHAT'S CHANGED? (UPDATED FOR SEPTEMBER 2026)	WHY?
	Updated the section on 'existing staff' to include volunteers	To reflect paragraphs 422 and 423 of KCSIE 2026
	Updated the definition of regulated activity to apply to both paid staff and volunteers	To reflect paragraph 315 of KCSIE 2026
	Updated the section on contractors to include that the school may request to see the certificate if the self-employed person has obtained their own check and ensure that it is at the level required by the school	To reflect paragraph 370 of KCSIE 2026
	Updated the sub-section on volunteers to reflect the removal of the supervision exemption	To reflect paragraphs 315 and 325 of KCSIE 2026
	Updated the 'New staff' sub-section to clarify that EYFS settings must not permit applicants to begin working until they have received the applicant's enhanced DBS certificate including barred list information	To reflect pages 84 and 85 of KCSIE 2026 (paragraph 326)
	Updated the definition of regulated activity to include all activities covered under the term	To reflect pages 81 to 83 of KCSIE 2026 (paragraph 317 and footnote 85)
	Added information about obtaining an enhanced DBS check with children's barred list information for existing volunteers in regulated activity	To reflect page 97 of KCSIE 2026 (paragraph 385)
	Updated the 'Volunteers' sub-section to clarify that EYFS settings must not permit applicants to begin volunteering until they have received the applicant's enhanced DBS certificate including barred list information	To reflect page 97 of KCSIE 2026 (paragraph 386)
Appendix D: specific safeguarding issues	**child criminal exploitation** Updated the sub-section to include that this abuse can be: • Perpetrated by males or females, as well as children and adults • A one-off occurrence or a series of incidents • Perpetrated by organised networks or gangs It also outlines the steps a member of staff and DSL will take if they suspect a pupil is at risk of CCE, or CCE has taken place . Added a note to include that children may be moved for the purpose of exploitation, and that this may constitute modern slavery	To reflect paragraph 36 of KCSIE 2026
	child sexual exploitation Updated the sub-section to include that this abuse can be: • Perpetrated by males or females, as well as children and adults • A one-off occurrence or a series of incidents It also outlines that CSE can range from opportunistic incidents to complex organised abuse. The section also includes a note that most sexual abuse is committed by individuals known to the victim, and that it might constitute modern slavery	To reflect paragraphs 40 to 42 of KCSIE 2026

Appendix F: Updates and amendments to this policy for September 2026

POLICY SECTION	WHAT'S CHANGED? (UPDATED FOR SEPTEMBER 2026)	WHY?
	child-on-child abuse Expanded section to include harassment and violence and discriminatory behaviour • Discriminatory behaviour (including racism, faith-targeted abuse, and other prejudice-based incidents) Updated the following bullet point to refer to AI-generated images: • Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery), including those generated with AI	To reflect changes in language throughout KCSIE 2026
	domestic abuse added Operation Encompass, as this is now statutory for all police forces	To reflect page 15 of Operation Encompass
	Sexual violence and sexual harassment between children in schools Expanded section to include harmful sexual behaviour, and include definitions of sexual violence and consent Added a bullet point outlining that staff should recognise the intersection of misogyny/misandry and harmful sexual behaviour	To reflect paragraph 191 of KCSIE 2026
	serious violence Updated the sub-section to outline: • What serious violence may involve • The risk factors associated with serious violence • The actions that a member of staff and DSL should take if they have concerns that a pupils is involved in or at risk of serious violence	To reflect paragraphs 49 to 52 of KCSIE 2026