



Minerva
Learning Trust



School Child Protection and Safeguarding Policy

2025-26

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Changes to this edition

Updated in line with DfE's Keeping Children Safe in Education 2025.

1. Purpose

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

2. Aims

Barrow Hill Primary Academy and all its employees, governors and volunteers, are committed to promoting the welfare of all children and young people. This policy reflects its responsibilities to ensure all members of the school create a safe environment within which children and young people can learn.

Safeguarding and child protection is everyone's responsibility. This policy applies to all school and trust staff, volunteers, governors and trustees in the trust and is consistent with the procedures of the three safeguarding partners. These are the CCG (Clinical Commissioning Group), the Police and the Local Authority Safeguarding Children Partnership. Appropriate information sharing, in line with the Data Protection Act and GDPR, across our safeguarding partners is key to the successful implementation of this policy.

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

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

3. Links to other documents

This policy is underpinned and written in reference to the following legislation and guidance:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- Anti-social Behaviour, Crime and Policing Act 2014
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- DfE (2025) 'Keeping children safe in education 2025'
- DfE (2023) 'Working Together to Safeguard Children 2023'
- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2025) 'Academy Trust Handbook 2025'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- DfE (2024) 'Working together to improve school attendance'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2024) 'Information sharing'
- DfE (2025) 'Academy trust governance guide'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE 2012 ([updated in 2021](#)) 'Teachers Standards'
- DfE (2025) 'Meeting digital and technology standards in schools and colleges'
- DfE (2025) 'Filtering and monitoring standards for schools and colleges'
- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'

It also links to the following Trust and school policies:

- Trust Data Protection Policy
- Trust Records Management policy
- Trust Supporting Students with Medical Needs Policy
- Trust Suspensions and Exclusions Policy
- Trust Screening, Searching and Confiscation Policy
- Trust Complaints Procedure
- Trust Children Looked After Policy
- Trust Whistleblowing Policy
- Trust Recruitment Policy
- Trust Record retention Policy
- Trust Low-level concerns Policy
- Trust Managing Allegations of Abuse Against Staff
- Trust Staff Code of Conduct
- Trust Disciplinary Policy
- Trust Sexual Health Policy
- Trust Pregnant Pupil and School-age Parent Policy
- Trust Mental Health and Wellbeing Policy
- School Lettings Policy
- School Behaviour Policy
- School Anti-bullying Policy
- School Health and Safety Policy
- School SEND Policy
- School Attendance Policy
- School Online Safety Policy
- School Curriculum Policy

This safeguarding policy also reflects the Local Authority's agreed multi-agency procedures that have been put in place by the three safeguarding partners. Local Authority Children Safeguarding Partnership has developed a comprehensive set of [policies](#) and these have been used to inform this policy.

4. Definitions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of 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. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

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

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

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

5. Important Contacts

Below are the relevant Safeguarding contact details for << insert school name >> and other relevant safeguarding contacts.

Role/Organisation	Name	Contact details
Designated Safeguarding Lead (DSL)	David Smith	info@barrowhill-mlt.co.uk 01246 472494
Deputy DSL	Sophie Cooper	info@barrowhill-mlt.co.uk 01246 472494
Other contactable DSL(s) and/or deputy DSL(s):	Jeanette Saville Shona Buckley	info@barrowhill-mlt.co.uk 01246 472494
Children Looked-After designated teacher	David Smith	info@barrowhill-mlt.co.uk 01246 472494
Online Safety Lead	David Smith	info@barrowhill-mlt.co.uk 01246 472494
Headteacher	David Smith	info@barrowhill-mlt.co.uk 01246 472494
Local Authority Designated Officer (LADO) Derbyshire		01332642376
Chief Executive Officer	Bev Matthews	bevmatthews@central-mlt.co.uk
Chair of Trust Board	John Doyle	jdoyle@minervalearningtrust.co.uk
Chair of Local Governing Body	Michelle Madders	info@barrowhill-mlt.co.uk 01246 472494
Lead Local Governor - Safeguarding	Frances Green	info@barrowhill-mlt.co.uk 01246 472494
Lead Trustee for Safeguarding	Dawn Walton	dwalton@minervalearningtrust.co.uk
Trust Safeguarding and Inclusion Manager and Trust DSL	Lucy McGann	lmcgann@central-mlt.co.uk
Channel helpline (Prevent Strategy)		020 7340 7264 Counter.extremism@education.gov.uk

Role/Organisation	Name	Contact details
NSPCC	National Helpline	0808 800 5000
ChildLine	National Helpline	0800 11 11
Child Exploitation and Online Protection (CEOP)	National Helpline	0370 496 7622

6. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and Governors in Minerva Learning Trust and each school within it and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities and online activities. Specific responsibilities in all areas of the organisation are highlighted below.

6.1 Trust Board

- Carrying out their functions to safeguard and promote the welfare of children in all schools within the MAT.
- Understanding their safeguarding duties and having regard to any statutory guidance on safeguarding issued by the Secretary of State.
- Taking strategic leadership responsibility for the trust's safeguarding arrangements.
- Ensuring the suitability of staff, supply staff, volunteers, contractors, and proprietors.
- Making sure that all schools within the trust have effective safeguarding policies, procedures and training in place that comply with their statutory obligations.
- Ensuring that the policies and procedures adopted by local governing boards, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.
- Having procedures in place to monitor the implementation of safeguarding policies and procedures regularly.
- Ensuring that all governors and trustees receive appropriate safeguarding and child protection training at induction, and that this training is updated regularly thereafter.
- Commissioning independent safeguarding audits of each school and the trust as a whole.
- Receiving regular reports from the CEO on safeguarding to the board of trustees delegating operational responsibilities.
- Ensuring that every school within the trust complies with its duties under the above child protection and safeguarding legislation.
- Facilitating training opportunities trust-wide to ensure consistency in the level of training and expertise in safeguarding across the trust's schools.

- Guaranteeing that each school within the trust contributes to multi-agency working in line with the statutory guidance '[Working Together to Safeguard Children](#)'.
- Confirming that the trust's safeguarding arrangements take into account the procedures and practices of the relevant LAs as part of the inter-agency safeguarding procedures.
- Understanding the local criteria for action and the local protocol for assessment for each school within the trust and ensuring these are reflected in the trust's policies and procedures.
- Complying with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensuring that staff in schools working directly with children read at least part one of KCSIE.
- Ensuring that staff in schools who do not work directly with children read either part one or Annex A of KCSIE. **NB:** Individual schools within the trust will assess which guidance will be most effective for their staff to safeguard and promote the welfare of children.
- Ensuring that mechanisms are in place to assist staff in schools to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensuring schools within the trust appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Ensuring schools within the trust appoint one or more DDSLs to provide support to the DSL and ensuring that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Ensuring each school within the trust facilitates a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern within a school that is part of the trust, ensuring there are procedures in place to take the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensuring systems are in place within the trust for pupils to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensuring that procedures are in place within the trust so that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensuring that arrangements are in place within the trust to liaise with LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Ensuring all relevant persons are aware of the trust's safeguarding arrangements, including the board of trustees itself, and each school's DSL, DDSL(s) and SLT.
- Making sure that pupils in each school are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhering to statutory responsibilities by ensuring pre-employment checks are conducted on all staff within the trust who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensuring that staff within the trust are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.

- Ensuring each school within the trust has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guaranteeing that volunteers within the trust are appropriately supervised.
- Making sure that at least one person on any appointment panel within the trust has undertaken safer recruitment training.
- Ensuring that all staff within the trust receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensuring each school within the trust takes overall strategic responsibility for filtering and monitoring, and seek assurance that the filtering and monitoring standards for schools are being met.
- Certifying that there are procedures in place within the trust to handle allegations against staff, supply staff, volunteers and contractors.
- Confirming that there are procedures in place within the trust to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guaranteeing that there are procedures in place within the trust to handle pupils' allegations against other pupils.
- Ensuring that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff within the trust.
- Ensuring that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child and teenage relationship abuse within the trust.
- Guaranteeing that there are systems in place for pupils to express their views and give feedback within the trust.
- Establishing an early help procedure and ensure all staff within the trust understand the procedure and their role in it.
- Appointing a designated teacher for LAC within each school to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensuring that the designated teacher for LAC within each school works with the virtual school head(s) (VSH) to discuss how the pupil premium funding can best be used to support LAC.
- Introducing mechanisms to assist staff within the trust in understanding and discharging their roles and responsibilities.
- Making sure that staff members within the trust have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Putting in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensuring the trust has put in place appropriate safeguarding responses for pupils who go missing from a school within the trust, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and preventing the risk of their disappearance in future.
- Ensuring that all members of the board of trustees have been subject to an enhanced DBS check.

- Creating a culture within the trust where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring that robust safeguarding records are kept in each school and the effectiveness of recordkeeping is monitored.
- Acting in accordance with their obligations under the Human Rights Act 1998 the Equality Act 2010, and the trust's local multi-agency safeguarding arrangements.
- Ensuring each school within the trust has appropriate arrangements are in place to keep children safe where school facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks.
- Ensuring each school within the trust has safeguarding requirements that are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.
- Ensuring each school within the trust has robust health and safety and emergency evacuation procedures.

6.2 Trust Board Safeguarding Lead Trustee

- Ensure safeguarding practices, policies and procedures are in place across the Trust and that schools are fully compliant and meeting statutory requirements.
- Work with headteachers and Lead Local Governor for Safeguarding to ensure that their school is fully compliant
- Undertake the role as set out in the Lead Local Governor and Lead Trustee reporting schedule, the Trust Scheme of Delegation, Trust Governance handbook and Trust Governance Business Planner.

6.3 The Chief Executive Officer

- Lead on the Trust-wide strategic approach for Safeguarding and ensure a culture of 'it could happen here' is embedded across all areas of the organisation
- Ensure that each school within the Trust has appropriate Safeguarding and related policies in place which link to the Trust's and the relevant Local Authority Safeguarding Children Board's overarching safeguarding expectations
- Ensure that staff are aware of how and when to act on concerns and that they always work in a safe and appropriate manner
- Ensure staff are updated on Keeping Children Safe in Education guidance through delivery of annual safeguarding training for all staff and sign to say they have read and understood Part 1 of the guidance
- Ensure each school has an identified and appropriately trained Designated Safeguarding Lead (DSL) in place and that the relevant training is up to date
- Facilitate an annual external safeguarding audit of all schools within the Trust to ensure compliance to Trust and statutory guidelines

6.4 The Local Governing Body

- The governing board will approve the school's policy at each review, ensure it complies with the model Trust level policy and hold the Headteacher to account for its implementation

- An individual member of the Local Governing Body should be designated as the school's Lead Governor for Safeguarding who will undertake the role in accordance with the Lead Local Governor and Trustee guidance and reporting schedule.
- The Lead Governor for Safeguarding will champion issues to do with safeguarding and child protection within the school, liaise and meet with the DSL, conduct relevant school visits and provide relevant information and reports to the Local Governing Body and the Lead Trustee for Safeguarding at least twice per year
- The governing board will appoint a Lead Governor to monitor the effectiveness of this policy in conjunction with the full governing board.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- All Governors will read Keeping Children Safe in Education part 1.

6.5 The Headteacher

- Ensure that the policies and procedures adopted by the trust, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff within the trust with the appropriate policies and information upon induction.
- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding and child protection, including online safety policy, as part of their induction and that systems and procedures are followed by all staff
- Ensuring all staff are, through training and information sharing, aware of the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- Ensuring all staff, Governors and volunteers receive ongoing training for safeguarding and that a robust induction process is in place for new staff
- Ensuring that all children and young people know there are adults in the school whom they can approach if they are worried or are in difficulty
- Include curriculum activities and opportunities which equip children with the skills they need to stay safe from abuse and develop resilienc
- Ensuring every effort is made to create effective working relationship with parents, carers and other agencies
- Ensuring that a designated member of staff is in place for Online Safety lead and Children Looked After (including those post-CLA)
- Ensuring that the DSL and Online Safety Lead has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Ensuring that staff implement appropriate filters and monitoring of online material.
- Ensuring that the school practises safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in Keeping Children Safe in Education and the Education (Independent School Standards) (England) Regulations 2014 as amended.
- Ensuring that, where the school ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS within one month.

- **Notifying the CEO, by telephone or email, within 24 hours of any of the following:**
 - Receipt of any safeguarding-related complaint made to Ofsted or directly to the school
 - Any serious safeguarding incidents that have been escalated to external authorities, which may bring the school/Trust into the media spotlight
 - Any incident for which the School's Critical Incident Plan may need to be implemented

6.6 The Designated Safeguarding Lead (DSL)

- Take lead responsibility for safeguarding and child protection, including online safety
- Provide advice and support to other staff on child welfare and child protection matters (including online safety)
- Ensure each member of staff within their school has access to and understands the trust-wide and individual school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the board of trustees or delegated authority to ensure their school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Understand the importance of information sharing within the trust, including within school, with the trust's other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Adhere to any other school-level duties outlined in their school's Child Protection and Safeguarding Policy and their job description.
- Refer suspected cases, as appropriate, to the relevant body
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Provide information to the Trust, LGB and local authority safeguarding partners
- The DSL will also keep the Headteacher informed of any issues and liaise with local authority case managers, the Police and designated officers for child protection concerns as appropriate.
- Conducting new staff safeguarding inductions
- Maintaining and monitoring child protection records and acting upon concerns where necessary and appropriate.
- Act as a source of support, advice and expertise for all staff and delivering regular staff training and updates.
- Act as a point of contact with the safeguarding partners.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school.
- Undergo training, and update this training at least every two years. Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties students may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

6.7 All staff

All staff will read and understand Part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

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

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

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the student.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which students can learn.
- Be prepared to identify students who may benefit from early help.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the online safety policy and their responsibilities for filtering and monitoring.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues
- All staff will understand what constitutes sexual harassment and sexual violence and will have a clear understanding of the school systems and processes to deal with this. All reported incidents will be taken seriously.
- The fact that a student may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.

6.8 The Central ICT Managed Service Team

- Review filtering and monitoring provision at least annually in line with DfE requirements set out in 'Meeting digital and technology standards in schools and colleges '
- Complete an annual digital audit
- Ensure any changes required following the review are implemented effectively
- Block harmful and inappropriate content without unreasonably impacting teaching and learning
- Ensure all schools and settings have effective monitoring strategies in place that meet their safeguarding needs
- Liaise with the DSL to ensure they are aware of filtering and monitoring systems in place
- Contribute towards the delivery of staff training and support, where necessary, and support DSLs in the development of staff training regarding filtering and monitoring systems

7. Multi-agency working

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements. It will also ensure all staff undertake their duties following an LA referral and ensure a child-centred approach to safeguarding, as set out under the Children Act 1989.

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

The school will be fully engaged, involved, and included in local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The school will act in accordance with the safeguarding arrangements.

The school will work with the Integrated Care System, the police, health services and other services to protect the welfare of its students, through the early help process and by contributing to multi-agency plans to provide additional support.

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

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

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

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

Information Sharing

The school recognise the importance of proactive information sharing between professionals and local agencies to effectively meet students' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the student being placed at risk of harm.

Staff members will be made aware that safeguarding partners may take legal action against them if they do not share specified information when a request is made for the purposes of safeguarding.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of students. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

8. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. The school will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm, whilst utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.

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

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Are suffering from mental ill health.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.

- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised.
- Have family members in custody or is affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a PRU.

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

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

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

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

Staff with delegated authority will collaborate with the relevant LAs and external agencies to engage with the local early help process.

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

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

Further information on the Sheffield procedure for Early help can be found [here](#) and for Derbyshire, click [here](#).

9. Recognising signs of child abuse

In relation to children, safeguarding and promoting their welfare is defined as:

- Protecting children from maltreatment whether that is within or outside the home or online
- Providing help and support to meet the needs of children as soon as problems emerge

- Preventing impairment of children’s mental and physical health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

For the purposes of this policy, “**abuse**” is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill-treatment that is not physical as well as the impact of 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. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the Internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

There are four types of child abuse as defined in ‘Keeping Children Safe in Education’ (2021):

9.1 Physical Abuse

Is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

Most children will collect cuts, bruises and injuries, and these should always be interpreted in the context of the child’s medical/social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, and shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental.

Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given; these can often be visible on the ‘soft’ parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

The physical signs of abuse may include:

- Unexplained bruising, marks or injuries on any part of the body
- Multiple bruises- in clusters, often on the upper arm, outside of the thigh
- Cigarette burns
- Human bite marks
- Broken bones
- Scalds, with upward splash marks.
- Multiple burns with a clearly demarcated edge.

Changes in behaviour that can also indicate physical abuse:

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example in hot weather
- Depression
- Withdrawn behaviour
- Running away from home.

9.2 Emotional Abuse

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

Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive and grow, however, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

Changes in behaviour which can indicate emotional abuse include:

- Neurotic behaviour e.g. sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent being approached regarding their behaviour
- Developmental delay in terms of emotional progress

9.3 Sexual Abuse

Is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

It is recognised that there is underreporting of sexual abuse within the family. All staff and volunteers should play a crucial role in identifying/reporting any concerns that they may have through, for example, the observation and play of younger children and understanding the indicators of behaviour in older children which may be underlying such abuse.

All staff and volunteers should be aware that adults, who may be men, women or other children, who use children to meet their own sexual, needs abuse both girls and boys of all ages. Indications of sexual abuse may be physical or from the child's behaviour. In all cases, children who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- Pain or itching in the genital area
- Bruising or bleeding near the genital area
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age, or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults

9.4 Neglect

Is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of the home, and online.

All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that students can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a student being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

It can be difficult to recognise neglect, however its effects can be long-term and damaging for children. Neglect is the ongoing failure to meet a child's basic needs and the most common form of child abuse. A child might be left hungry or dirty or without proper clothing, shelter, supervision or health care. This can put children and young people in danger. And it can also have long-term effects on their physical and mental wellbeing.

The physical signs of neglect may include:

- Being constantly dirty or 'smelly'.
- Constant hunger, sometimes stealing food from other children.
- Losing weight, or being constantly underweight.
- Inappropriate or dirty clothing.

Neglect may be indicated by changes in behaviour which may include:

- Mentioning being left alone or unsupervised.
- Not having many friends.
- Complaining of being tired all the time.
- Not requesting medical assistance and/or failing to attend appointments.

All staff in the school will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school, inside and outside of home, in an institutional or community setting by those known to them or by others and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

All staff will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. The school will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

All staff will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all pupils.

All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially schools' DSLs and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms).

All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

10. Specific Safeguarding Issues

There are specific issues that have become critical issues in safeguarding. The school will endeavour to ensure their staff, governors and volunteers are familiar with these issues, namely but not exhaustively:

- Radicalisation (Prevent Duty)
- Bullying including cyberbullying
- Child Sexual Exploitation (CSE) as defined by Working Together 2018 (Update September 2020)
- Children at risk of criminal exploitation (CRE) as defined by local safeguarding partnership procedures
- Domestic Violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced Marriage
- Gangs and Youth Violence
- Child on Child abuse
- Gender-based violence/Violence against women and girls (VAWG)
- Hate
- Mental Health
- Private Fostering
- Preventing Radicalisation
- Online abuse/Sexting
- Teenage Relationship abuse
- Trafficking
- Missing children and vulnerable adults
- Child sexual abuse within the family
- Poor parenting, particularly in relation to babies and young children

The school has a zero-tolerance approach to abuse, including child-on-child abuse.

The school will incorporate the signs of abuse and specific safeguarding issues on safeguarding into briefings, staff induction training, and ongoing development training for all staff and anyone who has contact with a child or young person including governors, supply teachers and volunteers. We will also access government guidance, local procedures, strategies and tools through the Local Authority Safeguarding Children Partnership.

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school, inside and outside of the

school, inside and outside of the home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. Staff will understand that, in most cases, multiple issues will overlap with one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

Bullying and forms of bullying on- and off-line including prejudice-based and cyberbullying are also abusive and will include at least one or more, of the defined categories of abuse above. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

10.1 Radicalisation and the Prevent Duty

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

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff who identify pupils who may be susceptible to extremist ideologies and radicalisation should act appropriately and contact the school's DSL. The school will work with local safeguarding arrangements as appropriate. Any Prevent referral will be made in line with Government guidelines.

The school will ensure all staff, including governors and volunteers, need to be aware of extremism, including the signs of it, alerts to concerning behaviours, and ideologies considered to be extreme. They need to have an understanding of the British Values agenda and adhere to their duties in the Prevent guidance, December 2023 to prevent radicalisation. The Headteacher will:

- Establish or use existing mechanisms for understanding the risk of extremism;
- Ensure staff understand the risk and build capabilities to deal with issues arising through the delivery of regular training and updates
- Communicate the importance of the duty
- Provide appropriate and sufficient training on the Prevent duty
- Ensure all staff (including governors and volunteers) implement the duty.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The Prevent duty

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

All schools will respond to any concern about Prevent as a safeguarding concern and will report in line with the school's safeguarding reporting procedures. This may include a referral into Channel using the case pathway process. They will seek to work in partnership, undertaking risk assessments where appropriate and proportionate to risk, building our children's resilience to radicalisation. They will use the relevant forms to record any concerns, keeping records which will be treated as a Child Protection Record, and storing them as appropriate.

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

10.2 Child Sexual Exploitation (CSE) and Children at Risk of Exploitation (CRE) (including Modern Slavery)

CSE is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

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

The school recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual;

this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

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

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional well-being.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education, or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.
- Engagement in offending
- Disengagement from education
- Overly secretive
- Repeat concerns about sexual health
- Decline in emotional wellbeing
- Unexplained Absence from school
- Association in gangs
- Unexplained injuries
- Carrying weapons, access to or carrying an unusual number of mobile phones

All suspected or actual cases of CSE/CRE/modern slavery are a safeguarding concern in which child protection procedures will be followed; this will include a referral to the police and social services. If any staff are concerned about a student, they should refer to the Designated Safeguarding Lead/s within the school.

10.3 Child Criminal Exploitation (CCE), Serious Violence and County Lines

Children and young people involved with gangs and criminal exploitation need help and support. This can include those involved in serious violent crime.

They might be victims of violence or pressured into doing things like stealing or carrying drugs, or weapons. They might be abused, exploited and put into dangerous situations.

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

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

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.

- Committing, or threatening to commit, serious violence to others.

County lines

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

Signs which may indicate criminal exploitation:

- Persistently going missing from school or home and/or being found out of area
- Unexplained acquisition of money, clothes, or mobile phones or unexplained injuries
- Excessive receipt of texts /phone calls
- Relationships with controlling /older individuals or groups, or changes in relationships
- Leaving home/care without explanation
- Suspicion of physical assault /unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results/performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

More specific indicators that a student may be involved in county lines include:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in an accommodation they have no connection with, or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Criminal exploitation of children is a safeguarding concern and will require a discussion with the DSL, who will seek advice from agencies and professionals. This will mean a referral into the Police and Social Care.

Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

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

Serious violence

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

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in well-being.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

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

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

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

The school will be aware that the Police, Crime, Sentencing and Courts Act will introduce a new duty in early 2023 on a range of specified authorities, such as the police, to share data and information, and put plans in place to prevent and reduce serious violence within their local communities. Schools will be under a separate duty to cooperate with core duty holders when asked – the school will ensure arrangements are in place to do so.

10.4 Carrying knives/offensive Weapons & Gang Culture

Children bringing and carrying a knife/offensive weapon onto the school premises is a criminal offence, and immediate action will be taken by calling the Police **and informing the CEO**. The guidance on 'Searching, Screening and Confiscation for Headteachers, Schools and Governors, 2022' will be consulted, and we will consider and may apply the appropriate actions set out in the school's behaviour policy, including the use of reasonable force.

If a member of staff suspects a student being involved in gang culture, this is a safeguarding concern and will require a discussion with the DSL, who will seek advice from agencies and professionals, including reference to the safeguarding procedures as outlined by the local authority.

10.5 Online safety and personal electronic devices

The school will adhere to the Trust's Online Safety Policy at all times.

As part of a broad and balanced curriculum, all students will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Student attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a student's online activity.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children from accessing inappropriate material, in accordance with the school's Cyber-Security Policy. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over-blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the DfE Digital Technology Standards. Staff will be aware of the filtering systems in place and will know how to escalate concerns where they are identified.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

The school will ensure that staff training in online safety covers the four categories of risk as outlined in KCSIE:

- **Content** - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation, and conspiracy theories.
- **Contact** - Training will address the risks of harmful online interaction with other users. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.
- **Conduct** - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as creating, sending, or receiving explicit images, the distribution of other explicit material, and instances of online bullying.
- **Commerce** - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams. Any concerns that pupils or staff may be at risk will be reported promptly to the Anti-Phishing Working Group or through appropriate safeguarding channels.

The Trust will ensure that each of its schools has appropriate filtering systems in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the [filtering and monitoring standards](#) published by the DfE.

All staff within the trust will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

Communicating with parents

As part of the usual communication with parents, the school will reinforce the importance of students being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.

The school will also make it clear to parents what their children are being asked to do online for school.

Reviewing online safety and filtering, and monitoring

The school will carry out an annual review of its approach to online safety and filtering and monitoring, supported by an annual risk assessment that considers and reflects the risks faced by students and tests that filtering and monitoring systems are working effectively. The school will also undertake an annual review to ensure it is meeting IT service and digital equipment standards. The DfE Plan Technology for Your School audit tool will be utilised to undertake this review which will inform an action plan.

Details of approaches for filtering and monitoring, and keeping children safe online can be found in the school's Online Safety Policy.

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and students is closely monitored by the school.

Photographs and videos of students will be carefully planned before any activity, with particular regard to consent and adherence to the school's Data Protection Policy and Photography Policy. The Data Protection Officer will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve students who are CLA, adopted students, or students for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of students who are CLA or who have been adopted, liaise with the student's social workers, carers or adoptive parents to assess the needs and risks associated with the students.

Staff will report any concerns about students' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

10.6 The sending of indecent images from one person to another through Digital Media Devices

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual

The school will ensure that staff are aware of the need to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Where a member of staff within the trust becomes aware of an incident of sharing nudes and/or semi-nudes, they will refer this to the affected school's DSL as soon as possible. Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copying, printing, sharing, storing or saving the imagery.
- Inform the affected school's DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved and reassuring them that they can receive support from the school's DSL.
- Report the incident to the school's DSL.

In the event of such a safeguarding concern, the school will seek advice from agencies and professionals, acknowledging that there are both national and local guidance that we need to adhere to. We will respond by working closely with parents and carers. We will teach children about this aspect of safeguarding through online safety lessons. These are linked to our RSE and online safety policies and PHSE curriculum.

Schools will refer to:

- "Sexting in Schools & Colleges: Responding to incidents & safeguarding young people" UK Council for Child Internet Safety
- The DfE Guidance 2018 on Searching, Screening and Confiscation Advice for Schools
- The DfE Guidance, June 2019, on Teaching Online Safety in Schools

The sharing of consensual and non-consensual nude or semi-nude images or videos will not be tolerated within the trust or any of its schools. When a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible.

Students within the school will be allowed an open forum to talk about their concerns regarding sexual imagery. They will be taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled. Reports of youth-produced sexual imagery will be managed at the school level. All incidents will be recorded on the school's CPOM system.

10.7 Sexual violence, sexual abuse and sexual harassment

Sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'. Schools and colleges should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment, both online and offline, including those that have happened outside of the school.

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

Sexual violence refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.

- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engage in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party.

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school.

Sexual harassment is likely to violate a student's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment can include, but is not limited to:

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

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

For the purposes of this policy, the "consensual and non-consensual sharing of nude and semi-nude images and/or videos", colloquially known as "sexting", is defined as the sharing between students of sexually explicit content, including indecent imagery. For the purposes of this policy, "indecent imagery" is defined as an image which meets one or more of the following criteria:

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

The school curriculum will ensure that students of all ages are taught about and understand the concept of consent and its importance in an age-appropriate way.

10.8 Female Genital Mutilation (FGM) and 'Honour-Based' Abuse (HBA)

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.

Female Genital Mutilation (FGM)

"Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons." (World Health Organisation, 2016)

FGM has been an embedded practice for centuries in some countries in the world, including Africa, the Middle East, Iran, Iraq, Oman, the United Arab Emirates, the Occupied Palestinian Territories, India, Indonesia, Malaysia and Pakistan (DH, 2015).

The World Health Organisation estimated that between 100 to 140 million women and girls worldwide have undergone FGM, but the prevalence of FGM in the UK is difficult to estimate because of the hidden nature of the crime.

All suspected or actual cases of FGM are a safeguarding concern, and safeguarding procedures will be followed. This will include a referral to the police. If any staff are concerned about a student, they will refer to the Designated Safeguarding Lead/s within the School before reporting the concern directly to the Police.

It is a mandatory reporting duty for all teachers/staff to directly report to the police where it is believed an act of FGM has been carried out on a girl under 18 in the UK. Failure to do so may result in disciplinary action being taken.

There are four types of FGM, mainly carried out on girls between the ages of five and ten. In some countries, it is practised on babies as young as two or three days old and in other areas, it is practised prior to marriage or as part of the wedding rituals.

It is the parents' decision as to whether their daughters are 'cut', but they face tremendous pressure from older members of their families, especially if they return to their country of origin. In most countries, including the UK, FGM is illegal.

Signs may include:

- Being repeatedly absent from school or absent for a prolonged period
- Not participating in Physical Education
- Unauthorised and or extended leave, vague explanations or plans for removal of a female in a high risk category (parents from a country who are known to practice FGM) especially over the summer period
- Plans to take a holiday which may be unauthorised, unexplained or extended in a country known to practice FGM
- 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, or having frequent urinary, menstrual or stomach problems
- 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 student may be at risk of FGM include:

- The girl's family has a history of practising FGM (this is the biggest risk factor to consider)
- FGM is 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)
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

FGM is included in the definition of so-called 'honour-based' abuse (HBA)', which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL, who will activate local safeguarding procedures if concerns arise.

Forced Marriage

Forcing a person into marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

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

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 student is being forced into marriage, they should speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will speak to the student 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 fm@fco.gov.uk, refer the student to an education welfare officer, class teacher, learning mentor, or member of the leadership team as appropriate.

10.9 Allegations of abuse against other children/Child on Child abuse (including sexual harassment)

For the purposes of this policy, "**child-on-child abuse**" is defined as abuse between children.

We recognise that some children abuse other children or their peers and the reasons for this are complex and are often multi-faceted. Child-on-child abuse can occur between students of any age and gender, both inside and outside of school, as well as online. We understand that we need as a school to have clear mechanisms and procedures in place to identify and report incidents or concerns. We have a zero-tolerance approach to child-on-child abuse and aim to eliminate such conduct.

All staff will be aware that child-on-child abuse can occur between students of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as "banter" or "part of growing up".

Child-on-child abuse is a safeguarding concern and normal procedures will be followed. We will consider and may apply the disciplinary/sanctions procedure outlined in the school's behaviour for learning policy. We will offer support to a victim.

We recognise child-on-child abuse can take many forms:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can 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.

The school is aware that some children may be particularly vulnerable and have an increased risk of abuse. The school will recognise that children with SEND or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The school will consider extra pastoral support for those children.

The school understands that all pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability and will ensure that all schools within the trust give special consideration to, amongst others, children who:

- Have SEND.
- Are vulnerable to being bullied.
- Are looked after or living in unsupportive home situations.

DSLs working in school will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

We will challenge this type of abuse and will use the curriculum to address and tackle child-on-child abuse.

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Students will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Students will also be reassured that they will be taken seriously, supported, and kept safe.

10.10 Cyber Crime

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

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

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

Staff who suspect a child is conducting a cybercrime on school premises should immediately notify the Headteacher and DSL so that quick and appropriate intervention and action can be taken. The Headteacher should inform the Trust CEO and Trust Network Manager immediately so that protections can be put in place. Where criminal activity is suspected, the Headteacher should inform the Police as soon as possible.

11. Children who may require early help or be at greater risk of harm

The school recognise that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for the safe management of safeguarding concerns and incidents amongst these groups are outlined below.

Early help means providing support as soon as a problem emerges, at any point in a child's life. All staff, governors and volunteers working within the academy should be alert to the potential need for early help for children, following the procedures identified for initiating early help using the local and current Local Authority Safeguarding Partnership Threshold.

Some children have an increased risk of abuse, 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. Any child may benefit from early help, but all school/college staff need to be alert to the potential need for early help for a child who:

- Are disabled and have specific additional needs
- Have special educational needs
- Have English as an additional language
- Are a young carer
- Are looked after or previously looked after
- Are privately fostered
- Have returned home to their family from care
- Are showing signs of engaging in anti-social or criminal behaviour
- Are in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, and domestic violence
- Are showing early signs of abuse and/or neglect
- Are showing signs of displaying behaviour or views that are considered to be extreme
- Are misusing drugs or alcohol themselves
- Are not attending school or are at risk of exclusion from school
- Frequently goes missing/goes missing from care or from home
- Are at risk of modern slavery, trafficking, exploitation, and radicalisation
- Have family members in custody or are affected by parental offending.
- Has a mental health need
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Are at risk of FGM, sexual exploitation, or forced marriage
- Are asylum seekers
- Are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and the association with organised crime groups or county lines
- Have a family member in prison or is affected by parental offending
- Are persistently absent from education, including persistent absences for part of the school day
- Are accessing alternative provision
- Have received multiple suspensions

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

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

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

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Further information on the Sheffield procedure for Early Help can be found [here](#), and for Derbyshire, click [here](#).

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

11.1 Mental Health of Children and Young People

It is important that staff understand that children's vulnerabilities related to mental health may be that they could be more likely to be impacted by other safeguarding concerns. When making referrals, the child's mental health should be shared.

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. 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 you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps outlined in section 5.

If staff have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action. There are a range of support mechanisms in the school to support students with their mental health. Significant concerns will be referred to their GP or directly to CAMHS. Staff should not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional.

11.2 Children absent from education

A child going missing 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 (particularly county lines), or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may 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 school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse 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.

Schools will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils who are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal

safeguarding procedures, in accordance with the Attendance Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

The school will follow the DfE's [guidance](#) on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

Admissions register

Students will be placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The LA will be notified about the admission automatically when entered into SIMS, given the local data sharing arrangement in place.

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

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

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

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

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

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

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

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.

- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order, and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

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

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

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

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

11.3 Students with special educational needs or disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can include:

- Assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's disability without further exploration.
- Being more prone to peer group isolation than other children.
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and communication barriers and difficulties in overcoming these barriers.
- Communication barriers which may exist, as well as difficulties in overcoming these barriers

We are mindful of these additional challenges, and where required, will provide extra pastoral support for children with SEN and disabilities. Staff need to be aware of the additional challenges faced by those with SEN or disabilities. The DSL will liaise with the school's SENDCo, as well as the student's parents where appropriate, to ensure that the student's needs are met effectively and the child is kept safe.

DSLs will make use of links to the following organisations to ensure links to support tools that help with appropriate pastoral support for children with SEND:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service (councilfordisabledchildren.org.uk)
- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people

11.4 Domestic abuse

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

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

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.

Older children may also experience domestic abuse and/or violence in their own personal relationships. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the DSL) before the child or children arrive at the academy the following day. The DSL will provide support according to the child’s needs and update records about their circumstances. It is likely that in this instance, Operation Encompass will contact the school.

11.5 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/deputies will be aware of contact details and referral routes into 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.

The school will be aware of the indicators that a family may be at risk of homelessness, including:

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

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

11.6 Children looked-after (CLA) and previously children looked-after (PCLA)

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PCLA, also known as care leavers, can also remain vulnerable after leaving care.

We are also aware that a previously looked-after child potentially remains vulnerable and this requires staff to have the skills, knowledge and understanding to keep them safe. We understand that all agencies must work together and take prompt action on concerns to safeguard these children, who are a particularly vulnerable group. The school will also ensure that care leavers are supported with pathways including liaison with the local authority where a personal advisor will be appointed.

Section 4 to 6 of the Children and Social Work Act 2017 states designated teachers will have the responsibility for promoting the educational achievement of those who have left care. The virtual school head at the local authority manages the student premium plus grant for children looked-after. The designated teacher should work with the virtual school head to discuss how funding can be best used to support the progress of the children looked-after in the school and meet the needs identified in each child's personal education plan.

The designated teacher should also work with the virtual school head to promote the educational achievement of previously children looked-after. Statutory guidance on promoting the education of children looked-after contains further information on the roles and responsibilities of virtual school heads.

We will ensure that staff have the skills, knowledge and understanding to keep children looked-after and previously children looked-after safe. 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
- We have appointed a designated teacher, who is responsible for promoting the educational achievement of children looked-after and children previously looked-after in line with statutory guidance.
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role. The designated teacher for looked-after and previously looked-after children

Further details of safeguarding procedures for CLA and PCLA are outlined in the Children Looked After Policy.

11.7 Children with family members in prison and part of the court system

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. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. A guide for 5-11-year-olds explains each step of the process and the support and special measures that are available. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families, including for the children involved. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service.

11.8 Parental alcohol and drug use

Parents' dependent alcohol and drug use can negatively impact on children's physical and emotional well-being, their development and their safety.

The impacts on children include:

- physical maltreatment and neglect
- poor physical and mental health
- development of health-harming behaviours in later life, for example, using alcohol and drugs and at an early age, which predicts more entrenched future use
- poor school attendance due to inappropriate caring responsibilities
- low educational attainment
- involvement in anti-social or criminal behaviour

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

11.9 Home Educated Children

Home-educated children can be more vulnerable than other children, and with regard to the motivations of the intention to home educate. The school has a responsibility to those who are thinking about or who are about to home educate, including those who have been removed from the school roll with a view to home educate.

In line with the School Attendance (Pupil Registration) (England) Regulations 2024, the school will ensure it informs their LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a student from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the student has SEND, is vulnerable, and/or has a social worker. The school must follow the guidance and process set out by the trust and ensure all necessary paperwork and permissions are completed/recorded.

11.10 Young carers

Young Carers can be more vulnerable or placed at risk. It is important to identify young carers and ensure they are supported to help reach their potential with an understanding that the school will need to refer into early help social care services for an assessment of their needs.

11.11 Private fostering

Private fostering occurs when a child is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, it will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

11.12 Students who need/have social workers

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

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

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

Where a child has a social worker and safeguarding concerns have come to light, the DSL will work in partnership with the allocated social worker where appropriate and necessary.

- Students 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 student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student'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
- The school will provide as much information as possible as part of any referral process to help social care assessments consider contexts outside of the home and enable a contextual approach to harm.
- Child protection records should include:
 - A clear and comprehensive summary of a concern
 - Details of how the concern was followed up and resolved
 - A note of any action taken, decisions reached and outcomes

The designated school key worker will ensure that child protection and Child in Need files are up to date and are stored on CPOMs or other similar safeguarding systems.

11.13 Lesbian, Gay, Bisexual and Gender Questioning Students

N.B. This section remains under review, pending the outcome of the gender questioning children guidance consultation, and the final gender questioning guidance documents being published.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm; however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, staff need to be aware that caution is necessary for children questioning their gender, as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children when deciding how to proceed.

Risks can be compounded when children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

12. Reporting concerns and taking action

The Trust and school will approve and continuously monitor the procedures within the school for reporting concerns about pupils' welfare. Monitoring visits will be conducted by the Trust Safeguarding and Attendance Manager and the school's lead safeguarding governor at least termly and will assess whether each school:

- Has clear procedures for staff to report concerns to their DSL.
- Has clear procedures for their DSL to make referrals to their LA.
- Has trained its staff members to understand their responsibilities in these procedures.
- Has ensured all staff are aware of their obligations in relation to confidentiality and information sharing.

Staff within the school will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. All staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL or deputy DSL, if they have a concern about a pupil.

The school will ensure that all staff members, including those working within the trust's schools, are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing.

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

Staff will be aware that students may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL or deputy DSL, if they have a concern about a student.

All staff members must be aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the communication and confidentiality section of this policy.

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

A referral should be made to the DSL if anyone believes a child is suffering or likely to suffer from harm, or is in immediate danger. The DSL should immediately inform children's social care and/or the police. In emergency situations, if the DSL or Headteacher is not immediately available, then **anyone can make a referral by calling the Police or local authority safeguarding hub.**

If an emergency referral is made by an individual, they must ensure the DSL is informed as soon as possible. Follow the local authority procedure for making a referral. Further information on how to report abuse is available [here](#). 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.

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

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

12.2 If a child makes a disclosure to you

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

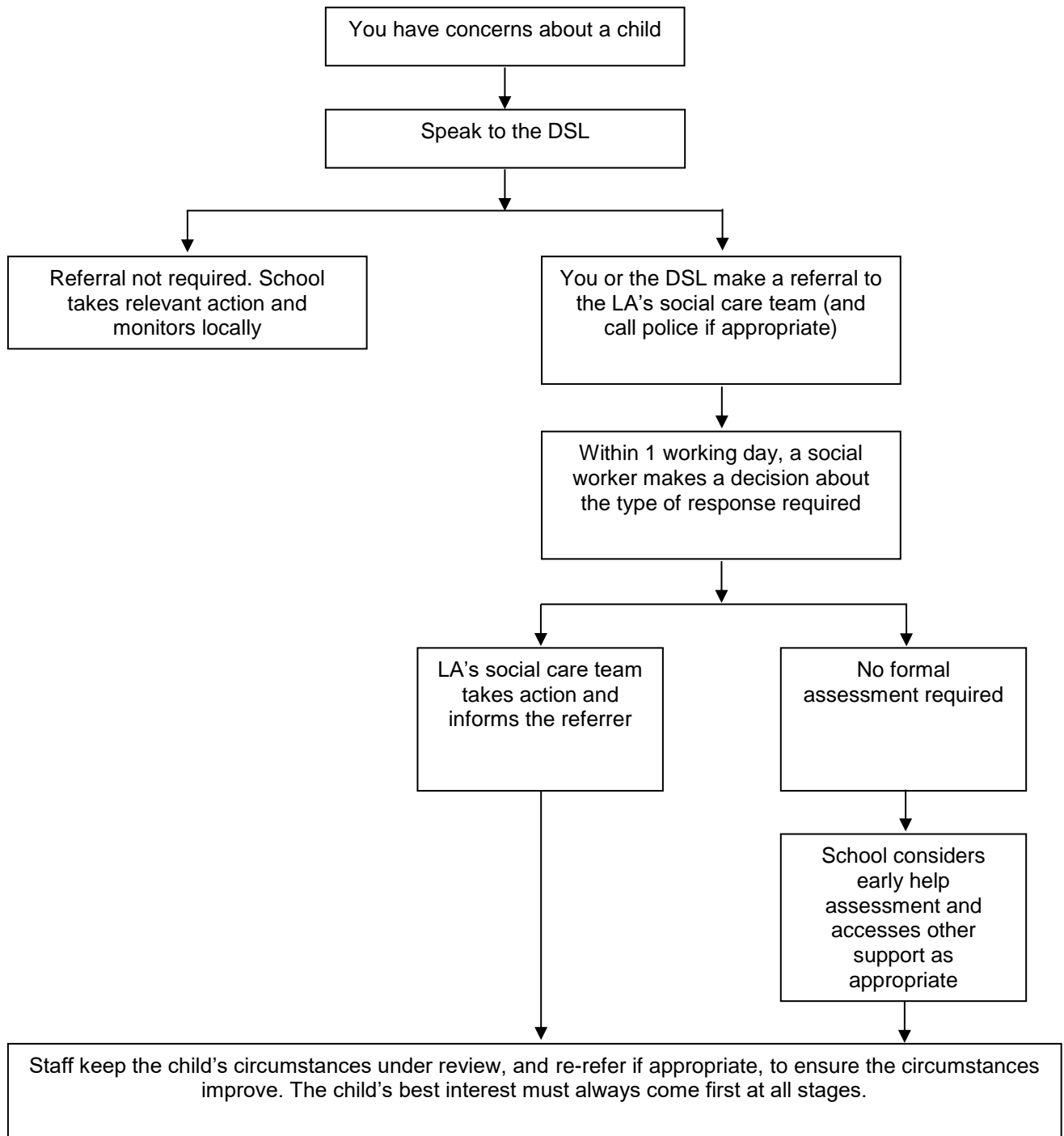
- Listen to and believe them. All disclosures and reports must be taken seriously.
- Allow them time to talk freely, and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (staff must personally report to the police where they discover that an act of FGM has been carried out), and tell the DSL as soon as possible that you have done so

12.3 If you have concerns about a child

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):

- Follow local authority procedure for referring safeguarding concerns.
- Where possible, speak to the DSL first to agree a course of action.
- If the DSL is not available, this should not delay appropriate action being taken. Speak to a deputy DSL or member of the senior leadership team and/or take advice from the 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 (or deputy) 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.

Figure 1: Procedure if you have concerns about a child's welfare (no immediate danger)



12.4 Allegations of sexual violence and sexual harassment

Systems are in place for children to confidently report abuse, knowing their concerns will be treated seriously. Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide us with the foundation for a calm, considered and appropriate response to any reports. Governing bodies should ensure that the school or college contributes to multi-agency working in line with statutory guidance: Working Together to Safeguard Children. Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will, however, need to be balanced with our duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour (HSB) has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- Any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse, and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra-familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, or school staff
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always, when concerned about the welfare of a child, all staff should act in the best interests of the child. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

12.5 Consensual & non-consensual sharing of nude and semi-nude images & videos (Sexting)

This approach is based on guidance from the UK Council for Child Internet Safety for [all staff](#) and for [DSLs and senior leaders](#), and the Local Authority Safeguarding Partnership.

Your responsibilities when responding to an incident:

If you are made aware of an incident involving sexting (also known as 'youth-produced sexual imagery'), you must report it to the DSL immediately. You must not:

- View, download or share the imagery yourself, or ask a student 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 student to delete it
- Ask the student(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 student(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 student(s) that they will receive support and help from the DSL.

12.6 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the Headteacher immediately.

Staff will have met the harm threshold if they have:

- Behaved in a way that has harmed a child, or may have harmed a child (or young person)
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved/may have behaved in a way that indicates they may not be suitable to work with children.
- The Headteacher/Chief Executive Officer will then follow the procedures and process checklist set out in the Local Authority Children Safeguarding Partnership.
- Allegations should be responded to quickly, fairly and consistently, protecting the child or young person whilst supporting the person subject to the allegation.
- The LADO and case manager should systematically record the allegations, detailing all decisions and actions.
- Procedures for dealing with allegations will be applied with common sense and judgement.
- Staff should refer to the Allegations & concerns about staff and volunteers process checklist, which can be found in the Local Authority policy.

- **If the concerns/allegations are about the Headteacher, individuals must report this directly to the Chief Executive Officer.**
- **If the concerns/allegations are about a Governor or a Trustee, individuals must report this directly to the Chief Executive Officer.**
- **If the concerns/allegations are about the Chief Executive Officer, individuals must report this directly to the Chair of the Trust Board**

Concerns that do not meet the 'harm threshold'

Low-level concerns about adult behaviour are those that do not meet the 'harm threshold' above but are not insignificant. They often cause a sense of unease or a 'nagging doubt'. e.g., behaviour that is:

- inconsistent with staff code of conduct, including outside work
- overly friendly with children
- having favourites
- taking photographs of children/young people on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating students

Such behaviour can appear inadvertent, thoughtless, or inappropriate, or intended to enable abuse. Concerns may arise from a:

- suspicion or complaint
- disclosure made by any child, parent, or other adult
- as a result of vetting checks

The school will ensure the staff codes of conduct, behaviour policy and safeguarding policies and procedures are implemented effectively, and that appropriate action is taken to deal with any concern.

Sharing Concerns:

- If staff find themselves in a situation that could be misinterpreted, or they have behaved in a way that falls below professional standards, they should self-refer.
- If there is a concern about a member of staff who may meet the harm threshold, the Trust procedure for Managing Allegations Against Staff should be followed and reported to the Headteacher (or Chief Executive Officer if the concerns relate to the Headteacher or Chair of the Trust Board if the concerns relate to the Chief Executive Officer). If the concern does not meet the harm threshold, the Trust's Low Level Concerns policy should be followed, and concerns reported to the Headteacher (or the Chief Executive Officer if the concern relates to the Headteacher).
- The Trust Whistleblowing Policy may be referred to where there are concerns about malpractice and a disclosure under the Public Interest Disclosure Act 1998.

Recording Concerns:

- The Headteacher should record all low-level concerns. Records should include:
 - Details of the concern
 - How the concern arose
 - The context in which the concern arose and
 - Action taken
- Records should be reviewed so that patterns of concerning behaviour can be recognised and appropriate action taken

Please refer to the Trust's Low Level Concerns Policy and the Trust's Managing Allegations Against Staff Policy for more information.

12.7 Non-collection of children

If a child is not collected at the end of the session/day:

- A check will be made for information about changes to the normal collection routines
- Reasonable attempts will be made to contact: parents, carers or others with parental responsibility at home or at work or other adults authorised to collect the child or vulnerable young person from the setting
- The child or vulnerable young person will not leave the premises with anyone other than parents, carers, others with parental responsibility or other authorised person
- If no one can be contacted to collect the child or vulnerable young person after one hour, the Local Authority Safeguarding Hub or Police will be contacted
- The child or vulnerable young person will stay at the setting in the care of two staff members until safely collected either by the parent, carer, a person with parental responsibility, other authorised person, social worker or police officer
- Staff should never take the child or vulnerable young person home with them or provide a lift to them in their own car, etc.

A full written report of the incident and outcome must be recorded on CPOMs.

Concerns about staff from third-party organisations should be reported to the DSL within the organisation without delay.

13. Confidentiality & information sharing

When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within the school and with other schools on transfer, including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made, including the rationale of those decisions. This will include instances where referrals were and were not made to another agency, such as LA children's social care or the Prevent program.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with the school's data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression, and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully, with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regard to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches can be prevented.

Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

14. Notifying parents/carers

The school will ensure, where reasonably possible, that they have more than one contact number for students and parents/carers.

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

15. Safeguarding in the curriculum

15.1 The Core Curriculum

The Core Curriculum of each school should address the following through its PSHE/SMSC/wider curriculum offer:

- Bullying/Cyberbullying/Peer-to-peer abuse
- Online safety
- Diversity issues
- Forced marriage, Honour Based Violence, FGM
- Domestic violence, drug and alcohol abuse
- Extremism, radicalisation
- Sexual exploitation – grooming, sexting
- Sexual harassment / sexual violence
- Promoting safe and respectful relationships (primary and secondary)
- Health education
- Child Criminal Exploitation and gang violence

15.2 Enrichment activities

Where the Trust or school provides services or activities under the supervision or management of Trust/school staff, then the Trust's and school's Safeguarding and Child Protection policies apply.

Where services or activities are provided separately by another body, this is not necessarily the case.

The school must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate and necessary.

The school should ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the provision/agreement.

15.3 Work Experience

The school will ensure that schools have the appropriate procedures in place to ensure that providers of work experience have appropriate safeguarding policies and procedures in place. Where pupils are undertaking work experience at the Trust or one of the schools within the trust, an enhanced DBS check will be obtained if the pupil is over the age of 16.

The school will ensure that the appropriate risk assessments and health and safety checks are in place to ensure the student's safety and well-being.

Students or volunteers carrying out work experience in the school (for example, secondary students working in a nursery) will be subject to a full induction, including details related to staff code of conduct, child protection and safeguarding. This will include details of procedures they should follow if they have a concern.

College students (those over the age of 16) must have completed a DBS check.

15.4 Alternative Provision (AP)

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs.

The school must ensure that the appropriate safeguarding measures are in place at the AP. The school must follow the procedures set out in the Trust's Alternative Provision, Standard Operating and Quality Assurance procedures. As part of this, the school must share relevant information on the referral form to ensure students can be adequately supported and safeguarded, and maintain regular contact with AP providers, ensure attendance daily data is collected and recorded for all students attending AP provision and conduct routine and regular quality assurance visits to the provision.

When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs.

Those responsible for the commissioning of alternative provision will be aware that pupils in alternative provision will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

More information can be found in the Trust's Standard Operating Procedures for AP.

15.5 Elective Home Education (EHE)

Schools will work closely with the LA to ensure that any requests for EHE are followed up with a request from the school for a meeting. All contact, subsequent meeting(s), meeting notes and outcomes will be carefully documented and recorded.

Schools must follow and implement the guidance and process set out by the Trust for managing EHE requests.

15.6 Reduced Timetables

Measures will be put in place to monitor the attendance, safety and well-being of all students placed on reduced timetables, and must be processed and monitored in line with the Trust's Reduced Timetable Standard Operating Procedures. All reduced timetables will be time-limited with regular review points built in. Systems and processes to monitor the safety and well-being of the child whilst not in school will be put in place.

16. Use of the school premises for non-school activities / extra-curricular activities

Where the school hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE's [guidance](#) on keeping children safe in out-of-school settings in these circumstances and the school's Lettings Policy.

Where the school provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the school will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The school will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard students and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs need to be aware of their safeguarding responsibilities and promote the welfare of students. Paid and volunteer staff need to understand how they should respond to child protection concerns and how to make a referral to social care or the police, if necessary.

17. Record-keeping

We will hold records in line with the Trust record retention schedule.

Schools will use CPOMs (online safeguarding storage system) to keep all safeguarding files secure. All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded in writing (including CPOMS where appropriate). If staff are in any doubt about whether to record something, they should discuss it with the DSL.

Non-confidential records will be easily 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.

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 securely, and separately from the main student file. This will be completed in line with KCSIE guidance. 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.

18. Training and development

18.1 All staff

All staff members and volunteers will undertake safeguarding and child protection training at induction. Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually. All staff will complete the statutory three-year safeguarding refresher course.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour Policy.
- The Children Missing from Education Policy, including the safeguarding response to children who are absent from education.
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.
- How access, use and record safeguarding concerns on CPOMS

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

- KCSIE update
- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.
- Reminders on how to access and use CPOMS to record safeguarding concerns.
- Safe and appropriate use of Artificial Intelligence by staff and pupils

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

18.2 The DSL and deputy DSL(s)

DSLs and deputy DSLs will undergo child protection and safeguarding training and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up to date with any developments relevant to their role. This will include training to understand the assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements. How LAs conduct child protection case conferences and a child protection review conference, to enable the DSL to attend and contribute to these effectively when required.

- The importance of providing information and support to CSCS.

- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.

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

18.3 Governors

All Governors will receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

This will include a requirement to complete a mandatory online KCSIE update on an annual basis and additional training modules through each LA's safeguarding board for those undertaking the Lead Safeguarding Governor role.

19. Safer recruitment

The school will follow the Trust Recruitment Policy.

19.1 Safer recruitment

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures. At least one member of SLT must be present at each interview panel.

We must prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.

This school will ensure that safer recruitment practices are always followed and that the requirements outlined in the statutory guidance 'Keeping Children Safe in Education'.

The school will ensure all necessary recruitment checks are carried out in accordance with KCSIE.

This includes:

- Verifying the identity of candidates
- A check of professional qualifications
- Checking the right to work in the UK
- DBS checks (see Section 5.5)
- Prohibition checks (where required)
- Section 128 checks (where required)
- Suitability checks (i.e. disqualification from working in a schooling environment)
- Additional overseas checks where relevant
- Asking for and follow up at least two references

- Scrutinising applications for gaps in employment
- Online search of the candidate. (including informing candidates that this will be undertaken at the application and shortlisting stage)

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

Pre-employment checks will be conducted for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

The school will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be conducted for all trustees and local governors, volunteers, and contractors within the trust.

The chair of trustees will undertake a suitability check by the DfE and an enhanced DBS check that will be conducted regardless of checks previously performed by other organisations or how recently these took place.

19.2 Staff suitability for education to students under the age of eight

All centres providing care for students under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a school environment.

A disqualified person will not be permitted to continue working at the school unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

Following the appointment, consideration will be given to staff and volunteers' ongoing suitability to prevent the opportunity for harm to children or placing children at risk.

19.3 Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in a regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

20. Single Central Record (SCR)

The Central Team and each school will keep an SCR which records all staff, including agency and third-party supply staff, teacher trainees on salaried routes and work experience students over the age of 16, who work at the school. The SCR must be maintained and quality assured in line with the Trust Standard Operating Procedure for the SCR.

All members of the Trust Board are also recorded on the SCR.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery) and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included. The school is free to record any other information it deems relevant. The details of an individual will be removed from the SCR once they no longer work at the school.

21. Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and in line with school procedures. 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 improvement officers, will be asked to show photo ID and will be asked to confirm their DBS clearance; 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 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 students or staff.

22. Complaints about safeguarding

22.1 Complaints

Any external complaints about safeguarding in the school should follow the Trust's complaints procedure. Any internal complaints about safeguarding in the school should be raised in the first instance with the headteacher.

22.2 Whistleblowing

Whistleblowing is the term used when an employee or worker passes on information concerning alleged wrongdoing, such as unlawful conduct, financial malpractice, causing a danger to staff, the public or the environment, contravening the Trust or School policies or the Trust Code of Conduct or deliberate concealment of any of these alleged activities. The wrongdoing disclosed must be in the 'public interest', and personal grievances or complaints would not normally be covered by whistleblowing law.

22.3 Concerns about school safeguarding practices

Concerns about any of the school's practices when safeguarding children or vulnerable adults should be raised initially with the Headteacher. Where individuals do not feel comfortable doing this, they should raise their concern with one of the specified people in the Trust Whistleblowing Policy.

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

23. Monitoring and evaluation

This policy will be reviewed annually by the Headteacher and the DSL using the Trust template provided. At every review, it will be approved by the Trust Board and Local Governing Body.

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

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

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

The school's systems and processes will be under continual internal review and will be subject to an external safeguarding audit annually.

24. Equality Impact Assessment

The Trust will carry out an Equality Impact Assessment in order to ensure that policies, procedures and practices cater for individuals who share protected characteristics in relation to the Equality Act 2010. The purpose of these assessments is to ensure that policies, procedures and practices within the organisation are fair to all. If unfairness is highlighted, the assessment will also seek to show how this can be changed and, where it can't be changed, how it can be improved.

The Trust will monitor the impact of the policy to assess whether there is evidence of a detrimental impact on anyone with a protected characteristic as a result of the application of this policy. The assessment will include consideration of adaptations or changes which can be made to address any issues identified.