



WESSEX
MULTI-ACADEMY TRUST

Safeguarding Policy

Adopted By: **Board of Trustees**

Date: **August 2026**

Review Date: **August 2027**

Safeguarding Policy

Date of Issue:	August 2026
Policy applies to:	All staff employed by the Wessex Multi-Academy Trust.
Policy Version Number:	5
Purpose of the document:	This policy has been created to outline a clear framework relating to any aspects of safeguarding within the trust.
Summary of the main points:	The document provides step by step guidance to ensure that members of the board of trustees, local governing bodies, headteachers and trust and school staff understand their responsibilities under safeguarding legislation and statutory guidance. The main points are: • Definitions • Legal framework • Roles and responsibilities • Multi-agency working • Early help • Abuse and neglect • Prevent
Approved by:	This policy has been approved by the Wessex MAT Board of Trustees
Reviewer:	Natasha Lawrence
Summary of amendments:	Updated guidance in the following sections:
Next review due:	August 2027

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Statement of intent

Wessex Multi-Academy Trust is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of our schools' premises. We implement a trust-wide preventive approach to managing safeguarding concerns, ensuring that the well-being of pupils is at the forefront of all actions taken.

The trust and its schools recognise the importance of preventative education in keeping pupils safe. Through the curriculum, including relationships, sex and health education (RSHE) and personal, social, health and economic (PSHE) education, pupils will be taught to recognise healthy and respectful relationships and behaviour, both online and offline. The trust and its schools take a zero-tolerance approach to sexism, misogyny and misandry, racism, and other forms of prejudice, discrimination or derogatory behaviour, and staff will consistently challenge such behaviour rather than tolerating it as "banter" or an inevitable part of growing up.

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

- All members of staff
- Any school within the trust
- All school governance committees of the trust
- Individual trustees and the board of trustees
- The trust as a whole, including central trust staff

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:

1. Ensuring that members of the board of trustees, school governance committees, headteachers/heads of school 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 the DSL or deputy DSL within their school.
2. Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
3. Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
4. Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
5. Ensuring that the headteachers/heads of school and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The DSL in our school is **Clare Moore, Head of School**. In the absence of the DSL, child protection matters will be dealt with by one of the deputy DSLs, **Rachel Dixon, Senior Leadership Team, Emma Young, Preschool Manager, Jessica Jordan, Afterschool Club Supervisor or Amanda-Jayne Cox-Newman Afterschool Club Supervisor** .

Wessex Multi-Academy Trust has adopted a software package called MyConcern to support our safeguarding arrangements. The requirements of relevant legislation, statutory guidance, our own policies and the safeguarding training provided by us or on our behalf will always remain the definitive source of safeguarding guidance for users of MyConcern.

Acronyms

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

Acronym	Long form	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CME	Child Missing from Education	A child of compulsory school age who is not on a school roll, nor being educated otherwise (e.g. privately or in alternative provision) and who has been out of any educational provision for a substantial period of time (usually four weeks or more).
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in the school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.

DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
FSAAL	Family Support and Advice Line	Front door service in Dorset for all safeguarding and wellbeing concerns.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools' and colleges' duties to safeguard and promote the welfare of children.

LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LADO	Local authority designated officer	The local authority officer responsible for managing and overseeing allegations against adults who work or volunteer with children.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.

TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VAH	Virtual academy head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

- **Definitions**

- 1.1. The terms “children” and “child” refer to anyone under the age of 18.
- 1.2. For the purposes of this policy, “safeguarding and protecting the welfare of children” is defined as:
 - Protecting pupils from maltreatment.
 - 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.
- 1.3. 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. The age of consent is 16.
- 1.4. 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.
- 1.5. 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.
- Sexual harassment of this kind is often rooted in sexist attitudes, misogyny or misandry, and staff will challenge such attitudes rather than dismissing them as “banter” or teasing.
- 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 self-generated intimate images and/or videos, including those generated using AI, e.g. deepfakes.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

1.6. For the purposes of this policy, “upskirting” refers to the act, as identified 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.

1.7. For the purposes of this policy, the “consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes”, colloquially known as “sexting”, is defined as the sharing between pupils 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

1.8. Where a school within the trust provides for children aged from birth to five, including in a school-based nursery or reception class, Section 3 of the Early Years Foundation Stage (EYFS) statutory framework (the safeguarding and welfare requirements) applies and should be read alongside this policy.

- **Legal framework**

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

2.2. Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (Academy Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021

2.3. Statutory guidance

- Prevent Duty Guidance 2023: for England and Wales
<https://www.gov.uk/government/publications/prevent-duty-guidance>
- DfE (2026) 'Working Together to Safeguard Children'
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- DfE (2018) 'Disqualification under the Childcare Act 2006'
<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006>
- DfE (2026) 'Keeping children safe in education 2026'
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation' <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
<https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance>
- 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'
<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage/multi-agency-statutory-guidance-for-dealing-with-forced-marriage-and-multi-agency-practice-guidelines-handling-cases-of-forced-marriage-accessible>
- DfE (2025) 'Working together to improve school attendance':
<https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>
- DfE revised guidance on Relationships, Sex, and Health Education:
<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

2.4. Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Information sharing'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit teachers from overseas'

2.5. Policies and documents

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

[school to add local policies]**

- Data Protection Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Recruitment and Selection Policy
- Staff Code of Conduct

• Roles and responsibilities

3.1. All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.

- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils 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 role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, during their induction. This will be regularly updated. Online safety training is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning, rather than delivered as a separate programme.
- 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 FSAAL, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to FSAAL and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- 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.
- Recognise and challenge racism, discrimination and bias, and be aware of how these can affect the identification of and response to a child's needs.

3.2. Teachers, including the headteacher/head of school, 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'.

3.3. The school governing committee has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the academy are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance '[Working Together to Safeguard Children](#)'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that all staff read Part One of KCSIE in full.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Facilitate 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, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place for children 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.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing committee is nominated to liaise with the 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.
- Guarantee that there are effective and appropriate policies and procedures in place.

- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing committee itself, the SLT and DSL.
- Make sure that pupils 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.
- Ensure all reasonable filtering and monitoring systems are in place to limit children's exposure to risks through access to the trust and schools' IT system and regularly, at least annually, review their effectiveness.
- Identify and assign roles and responsibilities to manage filtering and monitoring systems, review the standards and engage with IT staff to ensure standards are being met.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support pupils to be themselves at the school, e.g. if they are LGBTQ+.
- Ensure the school 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.
- Ensure appropriate checks are carried out for volunteers, including an enhanced DBS with children's barred list information for volunteers in regulated activity and that a volunteer on whom no checks have been obtained is never left unsupervised or allowed to engage in regulated activity.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure all staff receive safeguarding and child protection training, including online safety, which will cover expectations, roles, and responsibilities related to filtering and monitoring. This training should be provided at induction and at least annually through updates via emails, staff meetings, etc., as required. Online safety training must be integrated, aligned, and considered part of the overall school safeguarding approach, as well as wider staff training and curriculum planning.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place 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.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.

- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the virtual academy head (VAH) to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members 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.
- Put in place appropriate safeguarding responses for pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing committee have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.

3.4. The headteacher/head of school has a duty to:

- Ensure that the policies and procedures adopted by the governing committee, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.

3.5. The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns. NB: Individual schools, working with the DSL, define what "available" means and whether, in exceptional circumstances, availability via phone, video call, or other media is an acceptable substitution for in-person availability.
- To ensure continuity of safeguarding responsibilities, each school will implement robust cover arrangements for periods when the DSL is unavailable due to illness, leave or other circumstances.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
 - To FSAAL where abuse and neglect are suspected, and support staff who make referrals FSAAL.
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officer(s) (LADO) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.

- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher/head of school 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. This includes:
 - Ensuring that the school knows which pupils have or had a social worker.
 - Understanding the academic progress and attainment of these pupils.
 - Maintaining a culture of high aspirations for these pupils.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
 - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared. Where there are significant concerns — including information indicating that a pupil may pose a risk to themselves or to others — the DSL (or a deputy) will share this with the receiving setting's DSL, in addition to the file, and will consider a direct conversation between the two DSLs to ensure the information is understood and acted upon. Where the shared information indicates a risk to others and/or to the pupil, the receiving setting is responsible for assessing the risk and putting a safety and support plan in place. When deciding what information to share, staff will consider the relevance of the information, what the receiving setting needs to know and whether it is clearly presented and suitably contextualised, using professional judgement to ensure that any information shared is focused and proportionate.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the governing committee to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for

suspected cases of abuse or neglect, as well as the role the school plays in these referrals.

- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training and update this training at least every two years and in addition to the formal training set out, their knowledge and skills should be refreshed at regular intervals as required and at least annually to allow them to understand and keep up with any developments to their role.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referral processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of all concerns, discussions and decisions made, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme.
- Report annually to their Governing Body following the yearly safeguarding audit.

3.6. The designated teacher has a responsibility for promoting the educational achievement of LAC and previously LAC (PLAC), and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

3.7. The CEO has a duty to:

- Ensure there is challenge and support provided to schools regarding safeguarding, including checks, visits, peer and expert support and network meetings
- Periodically check each school's website and its Single Central Record to ensure compliance in relation to safeguarding requirements
- Commission and review the independent annual safeguarding audits including the follow-up action plans and share the audit reports with the LA
- Produce an annual safeguarding report for the Board of Trustees

- Appoint a “case manager” in the event that an allegation of abuse is made against the headteacher.

3.8. Trustees. Trustees have overall responsibility for the leadership of safeguarding arrangements across the Trust. All Trustees need to understand their safeguarding duties and should be kept up to date with legislation and regulation. The Board of Trustees has a legal responsibility to ensure that all our schools have effective safeguarding policies and procedures in place and to monitor their implementation regularly.

3.9. Trustees will:

- Ensure that all schools within Wessex MAT comply with child protection related legislation, including statutory training
- Ensure that overarching policies relating to child protection and safeguarding are provided to all Trust schools but that all schools tailor these policies to reflect local circumstances
- Ensure that the required safeguarding practices referenced throughout this policy are consistent across the Trust
- Have regard for the Department for Education’s latest guidance (statutory and non-statutory) for schools and colleges, ensuring that Trust wide policies, procedures and training are effective and compliant in light of these
- Ensure that Disclosure and Barring Service checks are carried out on all Members and Trustees of Wessex MAT
- Ensure that the central team commissions independent safeguarding audits of each school once per year
- Receive regular reports on safeguarding from the CEO
- Delegate responsibilities to LGBs as defined above
- Appoint a Safeguarding Trustee to meet termly with the CEO to monitor all points listed above and provide challenge and support to the Trustees

3.10. The Safeguarding Trustee is: Mike Glanville

- **Multi-agency working**

4.1. The trust contributes to multi-agency working as part of its statutory duty. The trust is aware of and will follow the local safeguarding arrangements. The schools within the trust will be fully engaged, involved, and included in local safeguarding arrangements. Once the trust and its schools are named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. Schools within the trust will act in accordance with the safeguarding arrangements.

- 4.2. The trust's multi-agency practice reflects the current version of Working Together to Safeguard Children (2026). This includes the integration of targeted early help and section 17 support into a single 'Family Help' offer, delivered through multi-disciplinary teams with a named lead practitioner, and reinforced expectations on multi-agency child protection, information sharing, and anti-racist and anti-discriminatory practice.
- 4.3. The trust will work with FSAAL, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.
- 4.4. Where a need for early help is identified, the schools within the trust will allow access for FSAAL 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.
- 4.5. The trust also recognises the particular importance of inter-agency working in identifying and preventing CSE.
- 4.6. Information sharing
- 4.7. The trust recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.
- 4.8. Considering the above, staff within the trust 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 pupil being placed at risk of harm.
- 4.9. Staff members within the trust will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are unsure about sharing information, they will speak to the DSL or the deputy DSL(s).
- 4.10. The trust and its schools are committed to inclusive, anti-racist and anti-discriminatory safeguarding practice, in line with Working Together to Safeguard Children and the trust's obligations under the Equality Act 2010, including the Public Sector Equality Duty. Leaders will foster an inclusive culture through the trust's practice, policies, training and engagement with families and partner agencies. All staff will be equipped not only to recognise racism and discrimination, but to challenge it, and will be alert to the ways in which bias, stereotyping or cultural misunderstanding can affect how a child's needs are identified and responded to. These principles apply throughout safeguarding practice, including assessment, early help and Family Help planning, child protection procedures, and multi-agency decision-making.

- **Early help**

Early help means providing support as soon as a problem emerges, at any point in a child's life. Early help ranges from universal, community-based support available to any family, through to targeted early help. Under the reforms introduced by Working Together to Safeguard Children (2026), targeted early help and support provided under section 17 of the Children Act 1989 are brought together into a single 'Family Help' offer, delivered through multi-disciplinary teams with a named lead practitioner. The trust and its schools will engage with local Family Help arrangements and, where appropriate, staff may act as, or support, the named lead practitioner.

5.1. 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.
- Have mental health needs.
- 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.
- Have experienced multiple suspensions, or are at risk of being permanently excluded.
- Are educated in alternative provision or a pupil referral unit
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison or are 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.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day.
- Are on a part-time timetable, or have been repeatedly removed from the classroom.
- Are pregnant or are a parent themselves.
- Show early signs of abusive, violent or harmful behaviour.

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

- **Abuse and neglect and exploitation**

- 6.1. 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, including where they see, hear or experience its effects. 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. Children may also cause harm to other family members, this is often referred to as child to parent or caregiver abuse.
- 6.2. 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.
- 6.3. 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 another person's needs. It may include verbal abuse, such as persistent criticism, belittling or name-calling, as well as 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.

- 6.4. 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.
- 6.5. 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.
- 6.6. All staff will be aware of the indicators of abuse, neglect and exploitation and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. All staff will be aware that abuse, neglect, exploitation 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 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.
- 6.7. 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.

- **Domestic abuse**

- 7.1. 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, stalking, controlling or coercive behaviour,

economic abuse, psychological or emotional abuse, or another form of abuse. "Personally connected" includes people who:

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

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

7.3. The schools within the trust participate in Operation Encompass where it operates locally, under which the police notify the school prior to the start of the school day when a child has been present at, exposed to or involved in a domestic abuse incident.

• **Homelessness**

8.1. The DSL and deputy DSL(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

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

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

8.3. Referrals to the Local Housing Authority do not replace referrals to FSAAL 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 FSAAL will be made as necessary where concerns are raised.

8.4. Temporary accommodation notification duty. Under the Children's Wellbeing and Schools Act, local housing authorities must notify educational institutions when a child is placed in temporary accommodation, where the required consent has been given. Where a school within the trust receives such a notification, it will use the information to safeguard and promote the pupil's welfare at the earliest opportunity and to support the pupil in improving their outcomes. The notification does not replace existing safeguarding and welfare duties, or a referral to FSAAL where a pupil has been harmed or is at risk of harm.

- **Children missing / absent from education**

9.1. A child being absent from education for prolonged periods and/or repeat occasions is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Staff will monitor pupils that are absent from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing Education Policy.

9.2. 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.

9.3. A child missing from education (CME) is a child of compulsory school age who is not on a school roll, nor being educated otherwise (e.g. privately or in alternative provision) and who has been out of any educational provision for a substantial time (usually four weeks or more).

9.4. Admissions register

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

9.5. 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 contact details 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.

9.6. 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 which the pupil will live at that address

9.7. 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

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

9.9. 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.

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

9.11. 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)

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

9.13. **Link to Safeguarding Concerns.** The school recognises that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues, including neglect, child sexual and child criminal exploitation - particularly county lines. Our response to persistently absent pupils follows the statutory guidance 'Working together to improve school attendance' which requires schools to work with local authority children's services where school absence indicates safeguarding concerns.

- **Child abduction and community safety incidents**

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

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

10.3. Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

- **Child criminal exploitation (CCE)**

11.1. 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

11.2. Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
 - Working in cannabis factories.
 - Shoplifting or pickpocketing.
 - Committing vehicle crime.
 - Committing, or threatening to commit, serious violence to others.
- All staff will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal

activity appears consensual. Staff will also recognise that pupils of any gender are at risk of CCE.

- All staff will be aware that CCE can be committed or facilitated by an organised network or gang, and that victims may identify as part of that group. Staff will be aware that exploitation of this kind may constitute modern slavery, and the DSL will consider a referral to the National Referral Mechanism where appropriate.

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

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

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

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

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

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

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

- **Cyber-crime**

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

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

- Child sexual exploitation (CSE)

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

- In exchange for something the victim needs or wants
 - For the financial advantage, increased status or other advantage of the perpetrator or facilitator
 - Through violence or the threat of violence
- All staff will 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. All staff 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. All staff will also recognise that pupils may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.
 - All staff will be aware that most sexual abuse is committed by individuals known to the victim, and that CSE can be committed by an individual or facilitated by an organised network or gang. Staff will recognise that children are not always identified as victims and can be criminalised for actions they take while under coercion; staff will remain alert to this and ensure victims are treated as victims.

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

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

17.2. All concerns related to CSE will be managed in line with the school's Child Sexual Exploitation (CSE) Policy.

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

- **Modern slavery**

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

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

- **FGM**

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

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

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

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

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

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

19.6. Indicators that FGM may take place soon include:

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

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

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.

- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

19.8. FGM is included in the definition of '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.

• **Virginity testing and hymenoplasty**

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

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

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

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

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

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

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

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

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

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

procedure.

- **Forced marriage**

21.1. For the purposes of this policy, a “forced marriage” is defined as a marriage that is 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 the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can occur when a person does not consent or cannot consent, e.g., due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

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

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem.
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.
- Regularly being absent from school.
- Displaying a decline in punctuality.
- An obvious family history of older siblings leaving education early and marrying early.

21.3. Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to FSAAL/FSAAL, the police or the Forced Marriage Unit.

- **Radicalisation**

22.1. For the purposes of this policy, “extremism” is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

- 1) negate or destroy the fundamental rights and freedoms of others or
- 2) undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights or
- 3) intentionally create a permissive environment for others to achieve the results in (1) or (2).

22.2. The types of behaviour below are indicative of the kind of promotion or advancement which may be relevant to the definition and are an important guide to its application. The further context below is also an essential part of the definition.

22.3. For the purposes of this policy, “radicalisation” is the process of a person legitimising support for, or use of terrorist violence.

22.4. For the purposes of this policy, “terrorism” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause. Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern
<https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting>.

22.5. Protecting pupils from the risk of radicalisation is part of the trust’s wider safeguarding duties. All staff 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 will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

22.6. 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 about radicalisation will be discussed with the pupil’s parents unless the school has reason to believe the child would be placed at risk as a result.

22.7. 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.

22.8. 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.

- **Pupils with family members in prison**

23.1. Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of ‘[Are you a young person with a family member in prison?](#)’ from Action for Prisoners’ Families, where appropriate,

and will be given the opportunity to discuss questions and concerns.

- **Pupils required to give evidence in court**

- 24.1. Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.
- 24.2. **[First/Primary schools only]** Pupils will be provided with the booklet '[Going to Court](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.
- 24.3. **[Secondary schools and post-16 settings only]** Pupils will be provided with the booklet '[Going to Court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

- **Mental health**

- 25.1. The trust recognises that promoting the mental health and wellbeing of pupils is an integral part of its safeguarding responsibilities, and each school within the trust adopts a whole-school approach to supporting pupil wellbeing. All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.
- 25.2. Staff will not attempt to make a diagnosis of mental health problems. The school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' childhood experiences and trauma can impact on their mental health, behaviour, attendance and education.
- 25.3. All staff will be alert to pupils who may be at heightened risk, including those experiencing self-harm, eating difficulties or disorders, or suicidal ideation. Where a member of staff has such a concern, they will report it to the DSL or a deputy DSL without delay and will not attempt to manage the concern alone.
- 25.4. Each school within the trust has clear systems and pathways in place for identifying possible mental health concerns and for escalating them, including clear routes to refer pupils for appropriate internal support and, where necessary, to external services.
- 25.5. Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSL(s).

25.6. The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

25.7 While it is not the role of staff to diagnose mental health problems, staff can help to fulfil four key roles: promoting good mental wellbeing and preventing the onset of mental illness; observing pupils and identifying early those who may be experiencing, or be at risk of developing, mental health problems; making sure early targeted support is provided; and liaising with and referring to specialist services where needed. Staff will make use of support from the school's Mental Health Support Team (MHST) where available. The school will ensure that any mental health support or interventions it offers are evidenced as safe, effective and appropriate for the need and phase of education.

- **Child-on-child abuse**

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

26.2. The trust has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

26.3. All staff will be aware that child-on-child abuse can occur between pupils 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 their DSL if they have any concerns about child-on-child abuse.

26.5. All staff will understand that child-on-child abuse is preventable and is a safeguarding issue for all children involved, including the alleged perpetrator. Recognising concerning behaviours and indicators early is key to preventing escalation. Staff will be aware that pupils may be at the highest risk of child-on-child abuse at particular times of the school day, such as immediately after school, and schools will take this into account in their supervision and safeguarding arrangements.

26.4. Staff will understand that children's sexual behaviours exist on a continuum, ranging from behaviour that is developmentally normal and expected, through problematic behaviour, to abusive or harmful sexual behaviour. Distinguishing between these can be difficult, and staff will use professional

judgement and appropriate tools, such as the Brook Sexual Behaviours Traffic Light Tool, to help identify where a behaviour sits and respond proportionately. Any concern about harmful sexual behaviour will be reported to the DSL.

26.5. All staff will understand the importance of challenging inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”. All staff will recognise that attitudes such as misogyny and misandry can underpin and normalise child-on-child abuse, sexual harassment and harmful sexual behaviour. Staff will challenge such attitudes wherever they arise, including when they are expressed as jokes or “banter”, and will be alert to how these attitudes can escalate if left unchallenged.

26.6. Child-on-child abuse can be manifested in many different ways, including:

- 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 self-generated intimate images and/or videos, including those generated using AI, e.g. deepfakes.
- 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.
- Behaviour driven by misogyny or misandry, including sexist or gender-based comments, name-calling and the targeting of pupils on the basis of sex or perceived gender.

26.7. All staff will be clear as to their 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.

26.8. All staff will be made aware of the heightened vulnerability of pupils with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil’s SEND and will always explore indicators further.

26.9. All staff will be made aware of the heightened vulnerability of LGBTQ+ pupils, who evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. The school's response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

26.10. Pupils 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. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school may signpost young people concerned about their own or someone else's sexual thoughts and behaviours to the Lucy Faithfull Foundation's 'Shore Space', which offers a confidential chat service:
<https://www.lucyfaithfull.org.uk/shore/>

- **Serious violence**

27.1. 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 wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

All staff will be aware that serious violence may involve physical assault and the carrying, use of, or threat of harm with a weapon, often in the context of peer conflict, bullying or exploitation. Any concern that a pupil is carrying, using or threatening to use a weapon will be reported to the DSL (or a deputy) without delay, who will assess the risk and take appropriate action, including contacting the police where necessary. All staff will be aware that schools play a key role in protecting children from violence, and that targeted interventions, such as mentoring or therapeutic support, are key to supporting pupils at risk of involvement in serious violence.

27.2. Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious

violence. These risk factors include, but are not limited to:

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

All staff will recognise that a pupil who displays or engages in violent behaviour may themselves be a victim of, or at risk of, abuse, exploitation or coercion. Safeguarding responses will therefore consider the needs of both the pupil who has been harmed and the pupil who has caused harm, taking a supportive and trauma-informed approach alongside any disciplinary or criminal justice response.

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

- **Online safety and personal electronic devices**

The trust and its schools recognise that the breadth of issues classified within online safety is considerable, but these can be categorised into four areas of risk:

Content — being exposed to illegal, inappropriate or harmful material, for example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation or extremism.

Contact — being subjected to harmful online interaction with other users, for example peer-to-peer pressure, commercial advertising, or adults posing as children or young adults with the intention to groom or exploit.

Conduct — personal online behaviour that increases the likelihood of, or causes, harm, for example sharing or receiving self-generated intimate images, or online bullying.

Commerce — risks such as online gambling, inappropriate advertising, phishing and financial scams. Where staff feel a pupil may be at risk, they will report it to the DSL.

28.1. All staff will adhere to their school's Internet and E-safety policy at all time.

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

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

- Pupil 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 pupil's online activity.

28.4. **Misinformation, Disinformation and Conspiracy Theories.** The school recognises that misinformation, disinformation and conspiracy theories constitute safeguarding harms that can pose risks to children's wellbeing. Staff should be alert to children who may be exposed to or influenced by false information that could impact their mental health, relationships, or safety.

28.5. **Misogyny, misandry and harmful online influences.** The school recognises that pupils may be exposed to and influenced by content promoting misogyny or misandry online, including material shared by so-called influencers, which can normalise sexist attitudes, harassment and harmful sexual behaviour. Staff will be alert to changes in pupils' language, attitudes or behaviour that may indicate exposure to such content, and will treat concerns as a safeguarding matter, reporting them to the DSL. The school will address these risks through its preventative education and curriculum.

28.6. **Technology Assessment and Standards.** The school uses the DfE's 'plan technology for your school' service to assess our filtering and monitoring systems against required standards and receive personalised recommendations for improvement: <https://www.gov.uk/guidance/plan-technology-for-your-school>

28.7. **Generative AI.** The school follows DfE guidance on the use of generative artificial intelligence AI in education (2025) as part of our filtering and monitoring approach: <https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education>
The school will ensure that suitable filtering and monitoring systems are in place on ICT equipment to prevent children accessing inappropriate material, in accordance with the school's Data and Cyber-security Breach Prevention and Management Plan. 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 trust and its schools recognise that generative artificial intelligence brings both opportunities and risks, and that AI-related harms are a safeguarding concern as well as a filtering and monitoring one. Staff will be aware that AI tools can be used to generate harmful, misleading or abusive content, including AI-generated sexual imagery and deepfakes, and that pupils may be exposed to, or targeted by, such content. The trust and its schools follow DfE guidance on the use of generative AI in education, and

any concerns relating to AI-generated content that affect a pupil's safety or well-being will be treated as a safeguarding matter and reported to the DSL.

The trust and its schools recognise the risks posed by AI-generated child sexual abuse material and by financially motivated sexual extortion ("sextortion"), where a child is coerced or threatened over sexual images. Staff will be alert to signs that a pupil may be affected and will report any concern to the DSL without delay. The trust will draw on specialist guidance and resources, including those provided by the National Crime Agency's CEOP Education programme and the Internet Watch Foundation, to support pupils and respond to incidents.

28.8. Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified.

28.9. Communicating with parents

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that it will be helpful for them to understand the systems the school uses to filter and monitor online use.

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

28.11. **Information security.** The trust and its schools recognise that information security and access management form part of their safeguarding responsibilities, not only their IT and data protection duties. The trust will maintain appropriate measures to keep pupils' personal and safeguarding information secure, and staff will follow the trust's data protection and information security procedures. This section should be read alongside the Data Protection Policy.

28.12. **Reviewing online safety.** The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils. This review will be carried out by the SLT member responsible for filtering and monitoring, with the support of the school's DSL and IT support and will include checks that the filtering and monitoring systems are working effectively across all internet-connected devices used by pupils and staff, in all relevant locations across the school site, and a record of each review, its findings and any resulting action will be kept.

28.13. Personal electronic devices

Mobile phones. In line with KCSIE 2026 and the DfE's statutory guidance on mobile phones in schools, all schools within the trust are mobile-phone-free

environments by default; anything other than this is by exception only. Pupils do not have access to their mobile phones throughout the school day, including during lessons, the time between lessons, breaktimes and lunchtime. Each headteacher decides how best to achieve a mobile-phone-free environment within their school's context, and each school has a mobile phone policy and related procedures making clear how this is implemented in their setting.

28.14. 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.

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

- **Consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated by AI e.g. deepfakes**

29.1. All schools within the trust will ensure that staff are aware to treat the consensual and non-consensual sharing of self-generated intimate images and/or videos, including those generated using AI, e.g. deepfake (the making and/or sharing of nudes and semi-nudes) as a safeguarding concern.

29.2. Staff within the trust 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, problematic or harmful. Staff will receive appropriate training on how to respond to incidents involving self-generated intimate images and/or videos, including those generated using artificial intelligence (e.g., deepfakes), within the school community. This will include understanding pupils' motivations, assessing the risks posed to any pupil depicted in the imagery, responding without unnecessarily criminalising the pupils involved, and knowing how and when to report such incidents.

29.3. Staff within the trust 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.

29.4. Where a member of staff within the trust becomes aware of an incident of sharing self-generated intimate images and/or videos, including those generated using AI, e.g. deepfake, they will refer this to the affected

school's DSL as soon as possible.

29.5. The school's full response to incidents of sharing self-generated intimate images and/or videos, including those generated using AI, e.g. deepfake, can be found in the **Youth-produced Sexual Imagery Policy**** [school to add their local policy name here].

- **Context of safeguarding incidents**

30.1. Safeguarding incidents can occur outside the school and can be associated with outside factors. All staff, particularly the DSL and deputy DSL(s), will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether wider environmental factors that threaten their safety and/or welfare. The trust will provide as much contextual information as possible when making referrals to FSAAL.

- **Pupils potentially at greater risk of harm**

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

31.2. A pupil having a medical condition, including allergies or a need for delegated healthcare tasks, is not in itself a safeguarding indicator. However, staff, and the DSL in particular, will consider whether a medical incident or the way a pupil's medical needs are managed at home raises a safeguarding concern, and will take appropriate action where it does. This section should be read alongside the trust's arrangements for supporting pupils with medical conditions.

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

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

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

31.6. **Home-educated children**

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services

needed to safeguard and support them.

31.7. In line with the Education (Pupil Registration) (England) Regulations 2006, each school within the trust will ensure it informs its LA of all deletions from the admissions register when a pupil is taken off roll.

31.8. Where a parent has expressed their intention to remove a pupil from a school within the trust for EHE, the school, in collaboration with the trust, LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

31.9. Looked after Child and Previously Looked after Child

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. Previously Looked after Child, also known as care leavers, can also remain vulnerable after leaving care.

31.10. The board of trustees will ensure that school staff have the skills, knowledge and understanding to keep Looked after Children and Previously Looked after Children safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

31.11. The DSL will be provided with the necessary details of pupils' social workers and the VAH, and, for Previously Looked after Children, personal advisers.

**** [School to insert local policy/procedures for LAC/PLAC here]**

31.12. Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff within the trust will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

- 31.13. When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively. Schools should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Further information can be found in the SEND code of practice
<https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>.

Supporting pupils with medical conditions
<https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions--3>

and from specialist organisations such as: 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.

- 31.14. All local authorities have such a service: Find your local IAS service
<https://councilfordisabledchildren.org.uk/about-us-0/networks/information-advice-and-support-services-network/find-your-local-ias-service>.

- 31.15. Mencap represents people with learning disabilities, with specific advice and information for people who work with children and young people
<https://www.mencap.org.uk/>.

- 31.16. NSPCC – Safeguarding children with special educational needs and disabilities (SEND) and Safeguarding child protection/deaf and disabled children and young people <https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send> <https://learning.nspcc.org.uk/safeguarding-child-protection/deaf-and-disabled-children#risk-and-vulnerability-factors>

- 31.17. **LGBTQ+ Children who are lesbian, gay or bisexual**

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

- 31.18. Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

- 31.19. Young Carers

The trust's schools will be alert to the needs of young carers, recognising that caring responsibilities can impact on a pupil's attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure that young carers receive support at the right time and from the appropriate services, including additional support from external partners or local authority and health services.

31.20. Single-sex spaces, single sex sport and children questioning their gender

The trust and its schools will comply with their obligations under the Equality Act 2010, the Human Rights Act 1998 and relevant premises regulations, alongside their safeguarding duties, when making decisions in this area. Schools will have regard to the statutory guidance on children who are questioning their gender set out in KCSIE, which incorporates this content following the Cass Review and to the relevant premises regulations.

Single-sex facilities. Schools will provide separate toilet facilities for boys and girls aged eight and over. Pupils will not use toilet facilities designated for the opposite biological sex. Schools will provide separate changing and shower facilities for boys and girls, and no pupil aged eleven or over will be required or permitted to undress in front of a pupil of the opposite biological sex. Where a pupil requests arrangements relating to single-sex facilities, the school will not agree to arrangements that give access to facilities designated for the opposite biological sex.

If a gender-questioning pupil does not want to use the facilities designated for their biological sex, the school will consider whether an alternative facility can be provided (for example, a self-contained individual toilet, a fully enclosed changing room for use by one pupil at a time that can be secured from the inside, or access to facilities at an alternative time) without compromising the provision of single-sex facilities or the safety, comfort, privacy or dignity of any pupil. The school will keep a clear record of these situations, ensure they are communicated appropriately, and review them regularly. Where mixed-sex toilets are provided in addition to single-sex toilets, they will be in individual lockable rooms opening directly onto public areas, and the school will assess the safeguarding risks and plan accordingly.

Single-sex sport. Where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa), schools may separate pupils according to their biological sex, relying on the exception permitted under the Equality Act 2010. Where a sport needs to be played in single-sex groups from a

certain age to ensure pupils' safety, it will be played in single-sex groups with no exceptions. Where there are no safety concerns and a pupil makes a request relating to how they participate, the school will consider the request in line with the approach to requests for support with social transition set out in this policy, taking into account the best interests of the pupil and other pupils and the aim of creating safe and fair environments for PE.

Children questioning their gender. A pupil questioning their gender is not, in itself, an indicator of risk; however, staff will be aware that such pupils may have wider vulnerabilities, including complex mental health and psychosocial needs and, in some cases, additional diagnoses such as autism and/or attention deficit hyperactivity disorder. Schools will take a cautious approach, considering the individual pupil's needs in partnership with their parents. Parental involvement is the default, other than in the rare circumstances where involving parents or carers would place the pupil at a greater risk than not involving them, in which case the DSL will be involved in determining what action should be taken. Decisions will be made on a case-by-case basis, in the pupil's best interests, with any relevant clinical advice taken into account and wider vulnerabilities, such as the risk of bullying, addressed. Records of any individual arrangements agreed will be kept and reviewed.

Staff will not adopt any changes relating to social transition unless a decision has been made by the school following involvement of the pupil's parents or carers, and the school will ensure that its decision-making process is documented and records are kept. Schools will take a very careful approach to social transition, recognising the Cass Review's finding that there is a lack of good evidence on its long-term impact; primary schools will exercise particular caution, and support for full social transition in these settings is expected to be agreed very rarely. Schools will sensitively discuss any constraints on social transition, making clear that support does not include allowing access to toilets, changing rooms or overnight accommodation designated for the opposite sex, and will be conscious of the rights of pupils and staff in relation to religion or belief. Where a pupil speaks to a staff member about their feelings but does not ask the school to make any changes, this information will not be shared further unless there is a related safeguarding risk.

Schools are legally required to record a pupil's biological sex accurately wherever it is recorded, and will ensure that all relevant staff are aware of a pupil's biological sex. Schools will be particularly conscious of the vulnerabilities of pupils who have fully socially transitioned from an early age and may be 'living in stealth' (where other pupils and/or staff may be unaware of their biological sex), and will involve the DSL in these cases. Where a pupil wishes to fully or partially reverse a request that has

previously been agreed, the school will work closely with parents or carers and relevant experts to ensure the pupil is supported.

Overnight and residential accommodation. Schools will not allow a pupil to share overnight accommodation with a pupil of the opposite biological sex, and responding to a request to support any degree of social transition will not include allowing access to boarding or residential accommodation designated for the opposite sex. When allocating sleeping arrangements such as dormitories, tents or shared rooms on school trips, schools will have regard to their duties under the Equality Act 2010, their safeguarding obligations and other relevant regulations and standards. If a pupil does not want to share a room with another pupil of the same biological sex, alternative arrangements that do not compromise the safety, comfort, privacy or dignity of any pupil will be sought where possible.

31.21. Children in Kinship Care

The school recognises that the virtual head's role has been extended to include responsibility for promoting the educational achievement of children in kinship care arrangements, and we will work collaboratively with virtual heads in supporting these children. The school also recognises that virtual school heads treat attendance as a key factor in safeguarding and will work with the LA to support targets to improve attendance of these pupils.

● Use of the school premises for non-school activities

32.1. Where a school within the trust hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extra-curricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe.

32.2. Where a school within the trust provides the activities under the direct supervision or management of school staff, child protection arrangements will apply.

32.3. Where activities are provided separately by another body, this may not be the case; therefore, the local governing committee will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed.

32.4. The local governing committee will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The local governing committee will ensure that safeguarding requirements are included in any transfer of control agreement (e.g., a lease or hire agreement) as a condition of use and occupation of the premises, and

specify that failure to comply would lead to termination of the agreement.

32.5. Extra-curricular activities and clubs. Extra-curricular activities and clubs hosted by external bodies, e.g., charities or companies, will collaborate with schools within the trust to effectively safeguard pupils and adhere to local safeguarding arrangements.

32.6. Staff and volunteers running extra-curricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to FSAAL or the police, if necessary.

32.7. All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

- **Alternative provision**

33.1. The schools within the trust 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, that the provider has daily attendance figures, and, ideally, that there is a weekly visit or contact with the student and the provider. Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. The school follows the DfE's updated alternative provision guidance, which clarifies and reflects existing statutory requirements for safeguarding children in alternative provision settings.

33.2. The trust and its schools will have regard to the DfE's national standards for alternative provision when selecting and quality-assuring providers, and will use these to satisfy themselves that a placement is safe and meets the pupil's needs.

- **Work experience**

34.1. When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the person teaching, training, instructing, caring for or supervising the pupil on a placement will do so frequently, on more than three days in a 30-day period, or overnight, they are in regulated activity, and a person barred from working with children must not fulfil this role; however, the school cannot require the placement provider to obtain an enhanced DBS check with children's barred list information for staff supervising pupils aged 16 to 17 on work experience. Where a pupil aged 16 or over carries out work experience at the school in a role that gives them the opportunity for

contact with children, they may be engaged in regulated activity, and the school will consider obtaining an enhanced DBS check with barred list information. A DBS check cannot be requested for a pupil under the age of 16.

- **Homestay exchange visits**

- 35.1. School-arranged homestays in UK

Where a school within the trust is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, it will obtain all necessary information, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

- 35.2. Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

- 35.3. School-arranged homestays abroad

The school will liaise with partner schools to discuss and agree on the arrangements for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible for those providing homestays outside the UK. The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

- 35.4. Privately arranged homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

- 35.5. Private fostering

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 a school within the trust becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

- **Concerns about pupils**

- 36.1. If a member of staff in a trust school has any concern about a pupil's welfare, or a pupil has reported a safeguarding concern in relation to

themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSLs.

- 36.2. Staff 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. Staff will be aware that this must not prevent them from exercising professional curiosity and speaking to the DSL or deputy DSL if they have a concern about a pupil.
- 36.3. All staff members are 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.
- 36.4. Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSLs with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.
- 36.5. The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.
- 36.6. If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely in MyConcern.
- 36.7. If a pupil is in immediate danger, a referral will be made to FSAAL and/or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.
- 36.8. Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring the pupil feels heard and believed.
- 36.9. An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require to prevent needs from escalating to a point where intervention would be needed.

****[School to add any local procedures here]**

- **Managing referrals**

- 37.1. All staff members in a trust school, in particular the DSLs, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to FSAAL or other external agencies, information will be shared in line with confidentiality requirements and only where necessary.
- 37.2. The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.
- 37.3. Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. If this information is not forthcoming, the referrer will contact the assigned social worker for further details.
- 37.4. The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by FSAAL. Where FSAAL decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where FSAAL decides that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider using other support mechanisms, such as early help and pastoral support.
- 37.5. At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

- **Concerns about staff and safeguarding practices**

- 38.1. If a staff member in a school within the trust has concerns about another member of staff (including supply staff and volunteers), it will be raised with the headteacher of that school. If the concern is with regard to the headteacher, it will be referred to the chair of governors.
- 38.2. Any concerns regarding the safeguarding practices at the school will be raised with the SLT of the school, and the necessary whistleblowing procedures will be followed, as outlined in the trust's Whistleblowing Policy.

If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

- **Safeguarding concerns and allegations of abuse against staff**

39.1. All allegations against trust staff, supply staff, trainee teachers, volunteers and contractors will be managed in line with the relevant procedures laid out by the individual school at which the staff members work or have worked. The trust will ensure its schools are equipped to manage all allegations against staff, including those who are not employees of schools within the trust, and that the affected schools liaise with the relevant parties.

39.2. Where an allegation is made against a member of staff, supply staff, a volunteer or a contractor, the headteacher/head of school (or, where the allegation concerns the headteacher, the chair of governors or the case manager appointed by the CEO) will consider at the earliest opportunity whether the concern should be referred to the local authority designated officer (LADO). Where an allegation meets the harms threshold, the LADO will be informed within one working day, and the school will not undertake any investigation until the position has been discussed with the LADO.

39.3. When managing allegations against staff, the trust will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”. Allegations that meet the harms threshold include instances where staff have:

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

39.4. Low-level concerns will be handled in line with the affected school’s procedures ** [School to insert local procedures here]

- **Communication and confidentiality**

40.1. All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with the data protection policies of the trust and individual schools within the trust.

40.2. Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the trust and affected schools will consult its relevant policies 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 trust and its schools will do all it can to protect the anonymity of the pupils involved in the case.

- 40.3. Concerns will only be reported to those necessary for their 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 the pupil is aware of what information will be shared, with whom, and why.
- 40.4. 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 of the affected school 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.
- 40.5. Depending on the nature of a concern, the DSL of the affected school 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. External agencies will be invited to these discussions where necessary.
- 40.6. Where confidentiality or anonymity has been breached, the trust will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.
- 40.7. Where a pupil is leaving a school within the trust, the school's 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.

- **Safer recruitment**

- 41.1. The trust's full policy and procedures for safer recruitment are outlined in the Recruitment and Selection Policy.
- 41.2. 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:
 - Engage in unpaid or paid work that involves teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, where this is done frequently, on more than 3 days in a 30-day period, or overnight.

- Engage in any other paid work in a specified place (which includes schools and colleges) that provides the opportunity for contact with children, where this is done frequently or on more than 3 days in a 30-day period.
- Engage in relevant personal care or health care, at any frequency. Following the Crime and Policing Act 2026, the previous 'supervision exemption' has been removed; work carried out in specified places by supervised staff or volunteers now also falls within regulated activity, and any person volunteering in a role that involves teaching, training, instructing or supervising children on more than 3 days in a 30-day period, or overnight, is in regulated activity and requires an enhanced DBS check with children's barred list information. This applies to existing volunteers who fall within regulated activity from 1 September 2026, as well as to new volunteers. Where a volunteer meets the period condition by volunteering across multiple settings, the school will work with the other settings to decide who applies for the check.

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

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

41.5. The appropriate DBS and suitability checks will be carried out for all trustees, governors, volunteers, and contractors within the trust.

41.6. As part of the shortlisting process, schools should consider carrying out an online search of publicly available information as part of their due diligence on the shortlisted candidates. Any incidents or issues identified as part of these searches should be explored with the applicant during the interview. Schools and colleges should inform shortlisted candidates that the online searches may be done as part of the due diligence checks.

41.7. Staff suitability

[This section is only for schools providing education to pupils under the age of eight. Secondary schools should not use this section or the form provided in [Appendix A](#).]

41.8. All centres providing care for pupils 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.

41.9. All staff members are required to sign the declaration form provided in the appendices of this policy confirming that they are not disqualified from working in an educational 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.

41.10. Ongoing suitability

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

41.11. Referral to the DBS

The trust 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 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.

- **Single central record (SCR)**

42.1. Each school within the Trust keeps its own SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes. The central team keeps its own SCR, which includes central team staff, Trustees and Members of the Trust.

42.2. 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

42.3. 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 and the date that confirmation was received.

42.4. Checks conducted for volunteers will also be recorded on the SCR, including the enhanced DBS checks with children's barred list information required for volunteers in regulated activity. Where a volunteer is not in regulated

activity, the school will undertake a written risk assessment, using professional judgement to decide which checks, if any, are required (considering the nature of the work with children, what is known about the volunteer, whether referees can advise on suitability, and whether another level of DBS check is appropriate), and details of the risk assessment will be recorded.

42.5. Written confirmation that supply agencies have completed all relevant checks will also be included.

42.6. The school is free to record any other information it deems relevant.

42.7. The details of an individual will be removed from the SCR once they no longer work at the school.

● **Training**

43.1. Staff members will undergo safeguarding and child protection training at induction, which will be updated on a termly basis and/or whenever there is a change in legislation.

43.2. The induction training will cover: [schools to insert local procedures here if necessary]

- 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).
- The Behavioural Policy.
- The Children Missing Education Policy, including the safeguarding response to children who go missing from education.
- Appropriate child protection and safeguarding training, including online safety training.
- Information about the role and identity of the DSL and deputy DSL(s).

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

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

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

43.5. The DSL and deputy DSL(s) will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSL(s) 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 FSAAL referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to FSAAL.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

• **Monitoring and review**

44.1. This policy is reviewed at least annually by the designated safeguarding Trustee and board of trustees. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

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

Appendix 1

Staff Disqualification Declaration

Name of school:	
Name of staff member:	Position:
Orders and other restrictions	Yes/No
Have any orders or other determinations related to childcare been made in respect of you?	
Have any orders or other determinations related to childcare been made in respect of a child in your care?	
Have any orders or other determinations been made which prevent you from being registered in relation to childcare, children's homes or fostering?	
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in Schedule 1 of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018?	
Are you barred from working with children by the DBS?	
Are you prohibited from teaching?	
Specified and statutory offences	
Have you ever been cautioned, reprimanded, given a warning for or convicted of:	
• Any offence against or involving a child?	
• Any violent or sexual offence against an adult?	
• Any offence under The Sexual Offences Act 2003?	
• Any other relevant offence?	
Have you ever been cautioned, reprimanded for or convicted of a similar offence in another country?	
Provision of information	
If you have answered yes to any of the questions above, provide details below. You may provide this information separately, but you must do so without delay.	
Details of the order restriction, conviction or caution:	
The date(s) of the above:	
The relevant court(s) or body/bodies:	
You should also provide a copy of the relevant order, caution, conviction, etc. In relation to cautions and/or convictions, a DBS certificate may be provided.	
Declaration	
In signing this form, I confirm that the information provided is true to the best of my knowledge and that:	

- I understand my responsibilities to safeguard children.
- I understand that I must notify the headteacher immediately of anything that affects my suitability to work within the school. This includes any cautions, warnings, convictions, orders or other determinations made in respect of me that would render me disqualified from working with children.

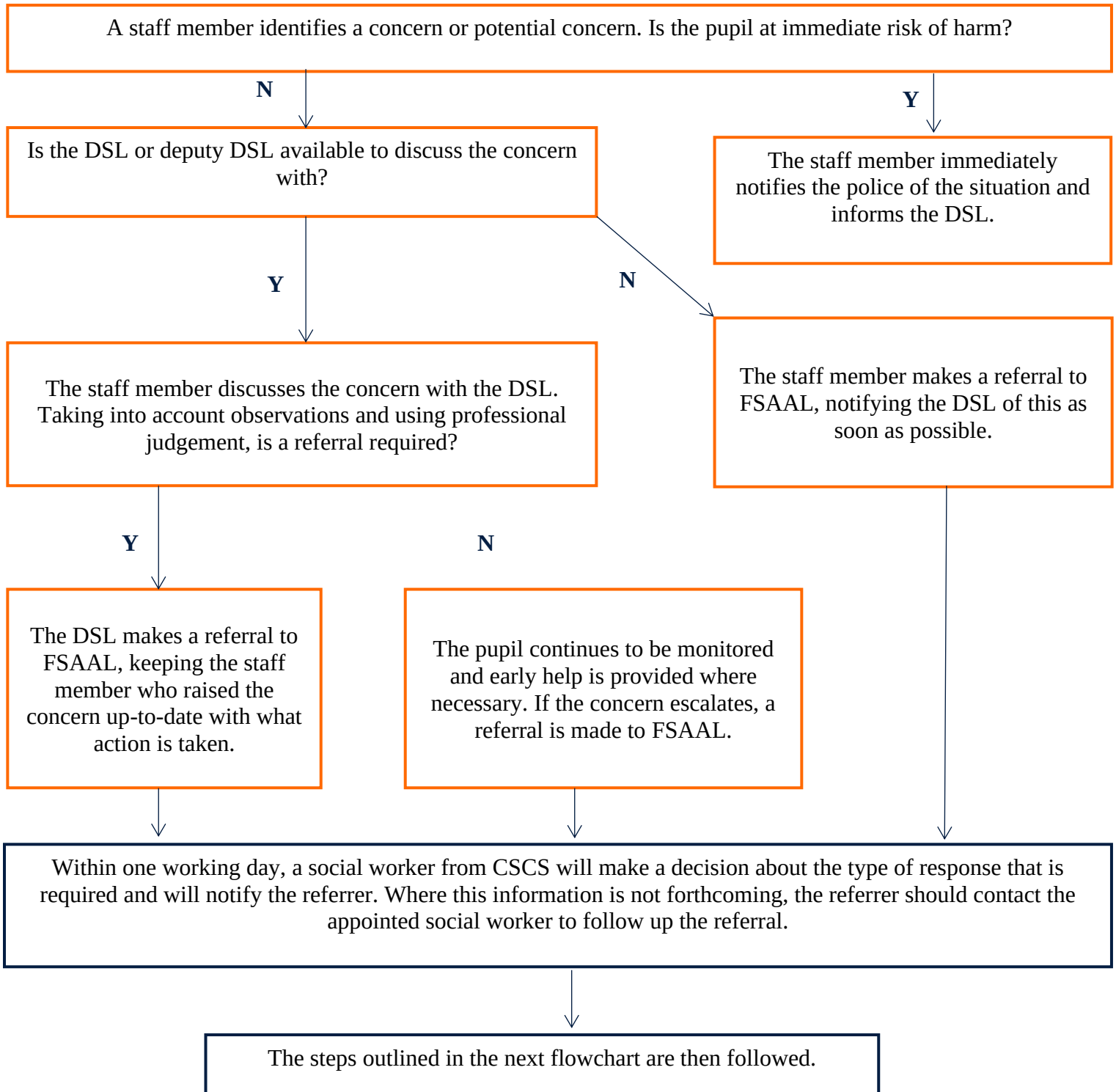
Signed:	
Print name:	
Date:	

Appendix 2

Safeguarding Reporting Process

The process outlined within the first section should be followed where a staff member has a safeguarding concern about a child. Where a referral has been made, the process outlined in the 'After a referral is made' section should be followed. The actions taken by the school are outlined in yellow, whereas actions taken by another agency are outlined in blue.

Before a referral is made



Once a referral has been made, a social worker from CSCS will notify the referrer that a decision has been made and one of the following responses will be actioned.

The pupil is in need of immediate protection.

Where the pupil is at risk of significant harm but is not in immediate danger, a strategy discussion is held.

No formal assessment is needed.

Where appropriate to do so, the DSL and staff member who raised the concern may be consulted during these stages to ensure that all areas of concern are addressed.

The DSL supports the initial staff member to liaise with other agencies to arrange an early help assessment and appropriate support.

Appropriate emergency action is taken by the social worker, police or NSPCC.

A Child in Need assessment is completed within 45 working days.

Within 15 working days of the strategy discussion, an initial child protection conference is held.

A child protection plan is potentially required.

The type of support needed is identified, arranged through multi-agency liaison and provided effectively.

Staff keep the pupil's circumstances under review and re-refer if appropriate to ensure circumstances improve – the pupil's best interests always come first.

If the child's situation does not appear to be improving, the DSL should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.