



AtC Trust Child Protection and Safeguarding Policy

Policy last reviewed:	September 2026
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Signed by		Date
Chair of trustees	Ruth Rule-Mullen	29.09.2026

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Statement of intent

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

This policy has been created to outline a clear framework relating to any aspects of safeguarding within the trust and should be followed, alongside each school's safeguarding procedures and policy, by:

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

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

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

All staff will remain alert to the risk of misogyny as a specific safeguarding concern and its role in normalising inappropriate behaviour or escalating to sexual harassment and violence.

DSLs and DDSLs within the trust

Name of school	Name of DSL	Name of DDSL(s)	Attendance Officer
Bowland High	Emma Robertson	Laura Fielden Claire George Rebecca Manley	Rebecca Manley
Roseacre Primary	Dawn Elliott	Julie Logan Rob Jarvis	Sam Boden
Thames Primary	Amy Balaam	Julie Allison	Melanie Sinclair
Witton Academy	Martin Knowles	Jodie Milburn Stacey Marks Michelle Dagger	Ryan Woods
Platt Bridge Community School	Stephen Wallace	Abigail Harmer	Jane Sargent
Hindley Junior & Infants School	Kathryn Radcliffe	Adele McKeever Daisy Egan	Kathryn Radcliffe

Note: To ensure continuity of safeguarding responsibilities, schools implement nominated named DDSL(s) to ensure robust cover arrangements for periods when the designated safeguarding lead is unavailable due to illness, leave or other circumstances. This ensures that all safeguarding concerns are received, monitored and acted upon without delay.

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.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act 2018.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EHCP	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 DfE 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.
UK GDPR	The UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.

IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the UK and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in LA care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
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 and disabilities (SEND) policy and provision of education to pupils with SEND.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the LA they work for, and all children who currently have, or previously had, a social worker.

Definitions

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

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

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

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

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

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

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:

- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Sharing unwanted explicit content.
- Upskirting.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation, coercion, and threats.

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

For the purposes of this policy, the **“consensual and non-consensual sharing of nude and semi-nude images and/or videos”**, colloquially known as “sexting”, 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

For the purposes of this policy, the term **“making or sharing nudes and semi nudes”** refers to the creation, sending and/or posting of nude or semi-nude images by young people under the age of 18. The term **‘images’** includes all visual content, such as photographs, videos and livestreams. The term **‘nudes’** is used because it is the most widely understood by young people and best captures the full range of image sharing behaviours covered. Images may be taken by the child themselves (sometimes referred to as ‘self-generated imagery’) or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as ‘deepfakes’ or ‘deep nudes’.

For the purposes of this policy, **“abuse”** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children. Children may also cause harm to other family members, often referred to as child to parent or caregiver abuse.

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

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

danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

For the purposes of this policy, **“sexual abuse”** is defined as abuse that involves forcing, causing or inciting 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, such as act of penetration, whether that is with part of a person’s body or an object (e.g. rape or 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, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline and technology can be used to facilitate offline abuse. Sexual abuse can be perpetrated by people of any gender and age. Children can be sexually abused within the family, an institution or a community setting and are more likely to know their abuser than not. Sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school’s policy and procedures for dealing with it. There are specific offences for children under 12, who can never provide valid consent to sexual activity and there are specific offences that make it clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

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.

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

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

The trust 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.

1. Legal framework

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

Legislation

- Human Rights Act 1998
- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Police, Crime, Sentencing and Courts Act 2022

Statutory guidance

- DfE (2026) 'Keeping children safe in education 2026'
- DfE (2026) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2018 update) 'Disqualification under the Childcare Act 2006'
- DfE (2024) 'Academy trust handbook 2024'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2022) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Governance handbook'
- DfE (2017) 'Child sexual exploitation'
- DfE (2022) 'Recruit teachers from overseas'

- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' - Updated 2024
- DfE (2021) 'Teachers' Standards'
- DfE (2022) 'Working together to improve school attendance'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-agency guidance'

2. Roles and responsibilities

The **board of trustees** is responsible for:

- Carrying out their functions to safeguard and promote the welfare of children in all schools within the MAT.
- Understanding their safeguarding duties and having regard to any statutory guidance on safeguarding issued by the Secretary of State.
- Taking strategic leadership responsibility for the trust's safeguarding arrangements.
- Ensuring the suitability of staff, supply staff, volunteers, contractors, and proprietors.
- Making sure that all schools within the trust have effective safeguarding policies, procedures and training in place that comply with their statutory obligations.
- Ensuring that the policies and procedures adopted by local governing boards, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.
- Having procedures in place to monitor the implementation of safeguarding policies and procedures regularly.
- Ensuring that all governors and trustees receive appropriate safeguarding and child protection training at induction, and that this training is updated regularly thereafter.
- Commissioning independent safeguarding audits of each school and the trust as a whole once every 2 years.
- Receiving regular reports from the CEO on safeguarding to the board of trustees delegating operational responsibilities.
- Ensuring that every school within the trust complies with its duties under the above child protection and safeguarding legislation.
- Facilitating training opportunities trust-wide to ensure consistency in the level of training and expertise in safeguarding across the trust's schools.
- Guaranteeing that each school within the trust contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirming that the trust's safeguarding arrangements take into account the procedures and practices of the relevant LAs as part of the inter-agency safeguarding procedures.
- Understanding the local criteria for action and the local protocol for assessment for each school within the trust and ensuring these are reflected in the trust's policies and procedures.
- Complying with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensuring that staff in schools working directly with children read at least part one of KCSIE.
- Ensuring that all staff members across the trust, regardless of their role or whether they work directly with children, read Part One of KCSIE 2026 in full.
- Ensuring that staff working in nursery or reception settings read Section 3 of the EYFS statutory framework in conjunction with KCSIE.

- Ensuring that mechanisms are in place to assist staff in schools to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensuring schools within the trust appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Ensuring schools within the trust appoint one or more DDSLs to provide support to the DSL and ensuring that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Ensuring each school within the trust facilitates a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern within a school that is part of the trust, ensuring there are procedures in place to take the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensuring systems are in place within the trust for pupils to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensuring that procedures are in place within the trust so that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensuring that a member of the local governing board for each school within the trust is nominated to liaise with the school's LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Ensuring all relevant persons are aware of the trust's safeguarding arrangements, including the board of trustees itself, and each school's DSL, DDSL(s) and SLT.
- Making sure that pupils in each school are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhering to statutory responsibilities by ensuring pre-employment checks are conducted on all staff within the trust who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensuring that staff within the trust are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensuring each school within the trust has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guaranteeing that volunteers within the trust are appropriately supervised.
- Making sure that at least one person on any appointment panel within the trust has undertaken safer recruitment training.
- Ensuring that all staff within the trust receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Certifying that there are procedures in place within the trust to handle allegations against staff, supply staff, volunteers and contractors.
- Confirming that there are procedures in place within the trust to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guaranteeing that there are procedures in place within the trust to handle pupils' allegations against other pupils.
- Ensuring that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff within the trust.

- Ensuring that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child and teenage relationship abuse within the trust.
- Guaranteeing that there are systems in place for pupils to express their views and give feedback within the trust.
- Establishing a Family Help procedure and ensuring all staff within the trust understand the procedure and their role in it.
- Appointing a designated teacher for LAC within each school to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensuring that the designated teacher for LAC within each school works with the virtual school head(s) (VSH) to discuss how the pupil premium funding can best be used to support LAC.
- Introducing mechanisms to assist staff within the trust in understanding and discharging their roles and responsibilities.
- Making sure that staff members within the trust have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Putting in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensuring the trust has put in place appropriate safeguarding responses for pupils who go missing from a school within the trust, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and preventing the risk of their disappearance in future.
- Ensuring that all members of the board of trustees have been subject to an enhanced DBS check.
- Creating a culture within the trust where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring that robust safeguarding records are kept in each school and the effectiveness of recordkeeping is monitored.
- Acting in accordance with their obligations under the Human Rights Act 1998 the Equality Act 2010, and the trust's local multi-agency safeguarding arrangements.

The **designated safeguarding trustee** is responsible for:

- Liaising with the board of trustees on an agreed basis with regards to safeguarding matters.
- Undertaking any responsibilities delegated to them by the board of trustees.
- Liaising with the DSL in each school on an agreed basis regarding safeguarding matters.
- Taking leadership responsibility for safeguarding arrangements within the trust.
- Ensuring that accurate and effective recordkeeping of concerns and incidents is in place.

Headteachers in each school throughout the trust have a duty to:

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

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

- Take lead responsibility for safeguarding and child protection within their school, including online safety.
- Report on an agreed basis to the board of trustees via the agreed route of communication.
- Refer cases:

- To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
- To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
- To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
- To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Ensure each member of staff within their school has access to and understands the trust-wide and individual school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the board of trustees or delegated authority to ensure their school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Understand the importance of information sharing within the trust, including within school, with the trust's other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Adhere to any other school-level duties outlined in their school's Child Protection and Safeguarding Policy and their job description.
- Utilise a confidential shared safeguarding mailbox to ensure continuity of oversight and facilitate effective cover during DSL absence.
- Adhere to any safeguarding arrangements specified in the trust's funding agreement.

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

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

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

- Consider, at all times, what is in the best interests of the pupils in the trust.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide safe environments in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the trust's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and DDSL(s) within the relevant school.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL within the relevant school.
- Be aware of and understand the trust's procedure to follow in the event that a pupil confides they are being abused, exploited or neglected.

- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to their school's DSL or DDSL(s) if they are unsure about how to 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.

3. Multi-agency working

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

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

The trust will work with CSCS, the police, health services and other services to protect the welfare of its pupils, through the Family Help and early help process and by contributing to multi-agency plans to provide additional support.

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

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

Information sharing

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 Family Help or early help.

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.

Staff members within the trust and its schools 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 school staff members are in doubt about sharing information, they will speak to their school's DSL or DDSL(s).

When deciding what information to share, schools will consider the relevancy of the information, including to the current safeguarding risk; what is necessary for the setting to know and whether it is clearly presented and appropriately contextualised. Professional judgement should be used to ensure that information shared is focused and proportionate which may include summarising information that is not necessary for safeguarding purposes. Care should be taken not to omit information that may be relevant to understanding of managing safeguarding risks. The Information Sharing duty is intended to give staff greater confidence to share information appropriately and in a timely way to safeguard children.

When a pupil leaves a school, the DSL or DDSL should ensure that the child protection file is transferred as soon as possible and within 5 days of the transfer or start of the new term to allow appropriate support to be in

place for the child. It is good practice for a conversation to take place between the DSLs at both school settings where there are concerns or issues. For example, in addition to the child protection file, the DSL should consider if it is appropriate to share further information particularly if the information would support an assessment of risk to the others in the school as well as the individual child. This may include, but is not limited to, information that would allow the new school to continue supporting a child who has a social worker and has been a victim of abuse, those currently receiving support through the Channel programme or concerns about serious violence or harmful behaviours including previously carrying, threatening with or using a knife as a weapon.

4. Family Help (Including Early help)

Early help means providing support as soon as a problem emerges, at any point in a child's life, covering universal services and community-based support. Family Help refers to targeted support for families with complex needs that do not yet meet the threshold for statutory Section 17 intervention. The Family Help model includes two sections: Targeted Early Help and Statutory Support (Section 17). Any pupil may benefit from Family Help or early help, but in particular, staff within the trust will be alert to the potential need for support 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.
- Are pregnant and/or parents themselves
- Have exhibited early signs of abusive, violent and/or harmful behaviours
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised 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.
- Show early signs of abuse and/or neglect in other ways.

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

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

Staff within the trust may be required to support other agencies and professionals in a Family 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 CSC for assessment for statutory services if the pupil's situation is not improving or is worsening.

5. Abuse and neglect and exploitation

All staff working within the trust, including all staff working within schools, will be aware of the indicators of abuse, neglect, exploitation and modern slavery.

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

All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. Staff will exercise professional curiosity and know what to look for in the early identification of abuse and neglect so they can identify cases of children who may be in need of help or protection.

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

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

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

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

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

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**.

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 should recognise that racism, faith-targeted abuse and other forms of discriminatory behaviour may have a significant impact on a child’s welfare, wellbeing and sense of safety and should be considered within safeguarding practices where appropriate.

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. Staff should be alert to when children might be at highest risk around the school day e.g. immediately after school.

All staff will speak to their school’s DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse as “banter” or “part of growing up” or “just having a laugh”. If downplayed and not challenged, this can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in the

worst case, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents.
- Abuse in intimate personal relationships between children – sometimes known as ‘teenage relationship abuse’.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Serious physical assault and harm or the threat of harm with a weapon.
- Sexual violence such as rape, assault by penetration and sexual assault – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting which typically involves taking a picture under a person’s clothing without their permission with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.
- Initiation and/or 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.

All staff will be clear as to the trust’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.

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 trust’s procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the trust’s Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

7. Online safety and personal electronic devices

Schools within the trust have a whole school approach to online safety to ensure that pupils and staff are protected and educated in their use of technology and that any concerns are escalated where appropriate. Online safety is categorised into four areas of risk:

- Content: Being exposed to illegal, inappropriate or harmful content for example pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation including fake news and conspiracy theories.
- Contact: Being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example peer-to-peer pressure, commercial advertising, and adults posing as children with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **Conduct:** Online behaviour that increases the likelihood of, or causes harm for example, making, sending or receiving explicit images including those generated using AI and online bullying.
- **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and or financial scams.

As part of a broad and balanced curriculum, all pupils within the trust's schools will be made aware of online risks and taught how to stay safe online, including the topics of disinformation, misinformation and conspiracy theories. From September 2026, this curriculum will also explicitly include teaching pupils about the risks of deepfakes, how to identify them, and the safe and ethical use of generative AI technologies.

The trust will ensure that all its schools have appropriate filtering systems in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with Cyber-security Policies. The trust will ensure that all schools meet the filtering and monitoring standards published by the DfE, including the 2026 technical standards for school networks which require enhanced detection of encrypted traffic and real-time alerting for high-risk activity. The trust supports schools to use generative AI safely and ensures filtering requirements apply to these tools.

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

Reviewing online safety

All schools within the trust 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. Regular checks, at least once per year, will be conducted to ensure that filtering and monitoring systems in place are effective and working appropriately on all internet connected devices in all relevant locations; record keeping will be available to demonstrate these checks.

Mobile Phones and Personal electronic devices

In line with DfE statutory guidance, all schools in the trust will be mobile phone free environments by default. Schools within the trust have the autonomy to decide how to best achieve this within their own school context. The trust and its schools maintain a policy of prohibiting or strictly restricting the use of mobile phones by pupils during the school day to reduce online risks and distractions, in line with DfE guidance. The use of personal electronic devices, including mobile phones and cameras, by staff and pupils will be closely monitored. The taking of any photographs and videos of pupils are carefully planned before any activity with particular regard to consent.

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

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

Upskirting

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

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

8. Consensual and non-consensual sharing of indecent images and videos

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

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

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

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

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

Further information on this procedure can be found in each school's Child Protection and Safeguarding Policy.

9. Pupils potentially at greater risk of harm

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

Pupils who need social workers

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

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

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

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.

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

Where a parent has expressed their intention to remove a 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.

Young Carers

Schools should be alert to the needs of young carers in their schools. Staff should be aware that the pupils' caring responsibilities may impact on their attendance, attainment, behaviour and well-being. Staff should be proactive about identifying young carers to ensure that they receive the right support at the right time and that this is provided by the appropriate services including external partners, local authorities and health services.

LAC, PLAC, Kinship care

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 LAC (PLAC), also known as care leavers, can also remain vulnerable after leaving care.

A kinship carer is someone who provides care for a child, often a relative or close family friend, when the child's parents are unable to do so.

The board of trustees will ensure that staff in the trust have the skills, knowledge and understanding to keep LAC, PLAC and those within kinship care arrangements 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.

The DSL in each school will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC, PLAC and those within kinship care arrangements are outlined in each school's LAC Policy.

Pupils with SEND

Staff will be aware that children with Special Educational Needs, disabilities and/or health issues may face additional safeguarding challenges both offline and online. Schools should ensure that their Child Protection policies and procedures reflect that additional barriers can exist when recognising abuse, neglect and

exploitation in this group of children. When managing safeguarding in relation to pupils with SEND, staff within the trust and its schools will be aware of the following:

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

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 in the affected school 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.

Pupils with Medical Conditions

An incident with the management of a pupils' medical condition (including allergies) would not in and of itself warrant a referral to the local safeguarding partners. Staff should be aware that a safeguarding referral would only be needed where an incident highlights concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school, college or setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

Schools should adhere to additional guidance in Supporting Pupils at School with Medical Conditions and Allergy safety in schools and ensure all staff have the relevant knowledge to support pupils' with medical conditions in their setting and role.

LGBTQ+ pupils

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 through discriminatory bullying. Staff within the trust 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+.

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 with. All 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. The school will ensure that they consider how to address such vulnerabilities and take steps to prevent discriminatory bullying including putting appropriate sanctions in place.

Pupils requiring mental health support

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. All staff will be made aware that mental health problems can, in some cases, develop into safeguarding concerns including self-harm, signs of eating disorders, suicidal ideation or suicide.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. School staff still, however, have an important role to play. School staff will be aware of their role in supporting pupils:

- Promoting good mental wellbeing and preventing the onset of mental illness.
- Observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one.
- Ensuring early targeted support is provided and
- Liaising with/referral to specialist services where needed.

It is important that the school's DSL informs the parents or carers of a child requiring additional support, if doing so would not place the child at additional risk. Staff should act in line with the school's approach to mental health and well-being. Each school within the trust has a mental health lead in place.

Where schools have access, they should make use of locally available support from their respective Mental Health Support Team (MHST) who can deliver evidence based intervention for early mental health support and give timely advice to help get pupils the right support from external specialist services.

Gender Questioning Children

The trust and its schools will follow a cautious, evidence-based approach when supporting gender questioning children. This framework prioritises parental involvement in all decisions related to a child's requests to socially transition, except in the rare circumstances where involving parents would result in a significant risk of harm to the child.

Schools will treat any request for social transition (e.g., changes to names, pronouns, or clothing) as an active intervention rather than a neutral act, given the potential significant and long-term effects on the child. Decisions will be made after a period of watchful waiting and in consultation with parents and, where appropriate, clinical professionals. Non clinical professionals e.g. the SENCo and DSL may also be consulted to consider everything that could affect a child including any wider health issues and/or neurodiversity. Schools should ensure that any request for social transition and the school's subsequent decision making is documented and that clear records are kept.

Schools have a duty to safeguard the welfare of children; as such, this means that the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children and a decision around social transition may not be the same as the child's wishes.

Schools should take time to understand the thoughts and feelings of children who are questioning their gender and should be appropriately professionally curious about the full range of the child's experiences. Schools should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment including discriminatory bullying.

It is important that schools consider the views of the child's parents or carers so that these are properly considered. However, in rare circumstances where involving parents or carers would constitute a greater risk

to the child than not involving them, the school should involve the DSL to determine the action needed to safeguard the child before any contact is made with parents and decisions are taken.

Schools should explore how best to support these conversations, including offering a staff member to be present or to speak to parents or carers on the child's behalf. In cases where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, there is no reason to break any confidence unless there is a related safeguarding risk. Schools and colleges should follow their usual procedures where a conversation with a child raises concerns about the child's wellbeing or safety, including involving parents or carers where appropriate.

Schools should take a very careful approach in relation to social transition. The Cass Review acknowledged that there is a lack of good evidence on the long-term impact of social transition on young people, but it is clear that social transition should be viewed as an active intervention that may have significant effects on the child or young person in terms of their psychological functioning and longer-term outcomes. Primary schools should exercise particular caution, and it is expected that support for full social transition would be agreed very rarely. The Cass Review acknowledges that older children will generally have greater agency to make their own decisions.

Schools should comply with obligations in the Equality Act and Human Rights Act when considering requests for support with social transition.

In line with the responsibilities of schools and colleges to adhere to the highest standards of safeguarding for the children and young people in their care, alongside obligations under the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, schools must not allow pupils into toilets, changing rooms, or boarding or residential accommodation designated for the opposite sex, with no exceptions.

To ensure the privacy, dignity, and safety of all pupils, the trust will maintain single-sex provision for toilets, changing rooms, and competitive sports based on biological sex. Gender questioning children will be provided with appropriate alternative arrangements where necessary, but these will not compromise the single-sex nature of existing facilities.

Schools should consider adopting policies across schools that maintain flexibility and avoid rigid rules based on gender stereotypes. Schools will need to consider whether the policy will place a child who is questioning their gender (and other gender-questioning children) at a disadvantage relative to other children. Schools should consider this both when developing policies and when considering requests to be exempt from such policies. Where the rule or policy places a gender-questioning child (and other gender-questioning children) at a disadvantage compared with those who are not gender-questioning, the school should consider the following: does the policy have a legitimate aim? For example, safeguarding or fairness in sport; and is the policy a proportionate means of achieving that legitimate aim?

When discussing requests with children, schools and colleges to which part 6 of the Equality Act applies should take time to sensitively explain the constraints on social transition set out in this guidance. This includes schools explaining that supporting any degree of social transition will not include allowing access to toilets, changing rooms or boarding or residential accommodation designated for the opposite sex, and will not include allowing children to join PE classes designated for the opposite sex where there are safety reasons for single-sex PE.

The school should also make sure that children and their families are aware that while the school or college will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, the school or college must also be conscious of the rights of pupils and staff in relation to their religion or belief.

Having the correct information about a child is important in the context of schools and colleges fulfilling their safeguarding duties, and they should make sure all relevant staff are aware of a child's biological sex in all cases. Schools and colleges are legally required to record a child's biological sex accurately wherever it is recorded.

Schools and colleges should be particularly conscious of the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth (that is, school or college friends/staff may be unaware of their biological sex). The Cass Review emphasised that these children are likely to approach puberty in a fearful and anxious state. Schools and colleges should involve the designated safeguarding lead in these cases.

The Cass Review highlighted the importance of maintaining flexibility and keeping options open for children who have socially transitioned and recommended that support should be provided to children who wish to de-transition. Schools and colleges should work closely with parents or carers and relevant experts to ensure that children in this position are supported.

10. Children who are absent from education

Children being absent from education for prolonged periods or on repeated occasions can act as a warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Each school's attendance procedures and response to persistently absent pupils and children missing from education will support identifying potential abuse.

Each school within the trust will follow the 'Working together to improve school attendance' guidance to ensure all admission and register requirements are in place to safeguard pupils. Each school will work within their Local Authority frameworks to support pupils for whom attendance is or is becoming a concern.

11. Use of school premises for non-school activities

Where a school within the trust hires or rents out school facilities or school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe, including seeking approval from the board of trustees, where required. The trust requires that schools within the trust refer to the DfE's **guidance** on keeping children safe in out-of-school settings in these circumstances.

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

Where activities are provided separately by another body, this may not be the case; therefore, the board of trustees or delegated authority will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed.

The board of trustees or delegated authority will also ensure that there are arrangements in place to liaise with schools within the trust on these matters where appropriate. The board of trustees or its delegated authority will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

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

Staff and volunteers running extracurricular 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 CSCS or the police, if necessary.

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.

12. Alternative provision

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 trust will ensure that its schools have procedures in place to ensure the setting is appropriate for the intended activity and that written confirmation will be obtained from the provider to confirm they have conducted all relevant safeguarding checks for staff and activities. Regular reviews will be undertaken to ensure the placements continue to be safe and meet the child's needs.

13. Work experience and Volunteers

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

If an individual is volunteering in one of the trust's schools, the school must obtain an enhanced DBS check including children's barred list check for any individuals who are working in regulated activity. Regulated activity means that the individual is working on a frequent basis in a specified establishment, such as the school, or in connection with the purposes of the establishment where the work gives opportunity for contact with children. A person will be also deemed in regulated activity if as a result of their work, and/or volunteering, they are responsible, on a frequent basis, or for more than 3 days in a 30 day period, in a school for teaching, instructing, training, caring for or supervising children, providing advice or guidance on physical emotional wellbeing or driving a vehicle only for children. Regulated activity also includes engaging in intimate or personal care of healthcare or any overnight activity even if this only happens once.

Further information and a full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012 and the Crime and Policing Act 2026.

Where a trust school is also subject to the EYFS Framework, volunteers must not be permitted to work within settings covered by the EYFS framework until the school has received the volunteer's enhanced DBS including barred list information.

Under no circumstances should a school leave a volunteer, for whom no checks have been obtained, unsupervised or with pupils working in regulated activity. The trust recognises that volunteers play an important role and that the nature of a volunteer's role may vary between schools. As such, schools must ensure that a written risk assessment is undertaken alongside staff's professional judgement and experience to decide what checks, if any, are required. The risk assessment should consider the nature of the volunteer's work with

children; what the establishment knows about the volunteers including formal and informal information and whether the volunteer has other employment where referees can advise on their suitability.

If the volunteer's role does not include regulated activity, the school may consider another level of DBS check that is appropriate e.g. an enhanced DBS check without barred list information for volunteers who would be in regulated activity but not volunteer frequently or a basic DBS check for any other volunteer who may have access to children.

14. Concerns about pupils

The trust will approve and continuously monitor the procedures within each school for reporting concerns about pupils' welfare. The trust will regularly review record keeping to ensure that information is kept confidential and stored securely. They will ensure that records meet the trust's robust and high safeguarding standard by including a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome. Termly reports to the Trust board will assess whether each school:

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

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

The trust adopts a zero-tolerance approach to child-on-child abuse, which is defined as abuse between children under the age of 18. The procedures for managing instances of child-on-child abuse will be held within each school and outlined in their safeguarding policies.

15. Managing referrals

The reporting and referral process outlined in each school's Reporting Safeguarding Concerns Flowchart will be followed accordingly, including referrals to Family Help Assessment services where targeted support is required.

All staff members, in particular the DSLs and DDSs working in schools within the trust, will be aware of the LA's arrangements in place for managing referrals. The school DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

DSLs will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. DSLs will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

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. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

Schools within the trust 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 CSCS. Providing support to meet a child's needs must begin as soon as a need is identified and must not be delayed while waiting for a statutory assessment to conclude. Where CSCS decide that a statutory investigation is not appropriate, schools will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as Family Help and pastoral support.

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. Schools 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.

16. Concerns about school safeguarding practices

Any concerns regarding the safeguarding practices at the trust 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 their school's SLT, or feels that their genuine concerns are not being addressed, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

17. Safeguarding concerns and allegations of abuse against staff

All allegations against school staff, trust staff, trainee teachers, supply staff, volunteers and contractors will be managed in line with the relevant Allegations of Abuse Against Adults Policy and the 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.

When managing allegations against staff, the trust will recognise the distinction between allegations that meet the harm 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.

Low-level concerns will be handled in line with the school's Reporting Low-level Safeguarding Concerns Policy or Procedure.

Supply Teachers, Trainee Teachers and All Contracted Staff

If an allegation is made against an individual who is not directly employed by the school, the school will share safeguarding responsibilities with the employing body/organisation and will remain responsible for gathering facts and managing the safeguarding process while working with the employment agency or business, which will usually lead on any disciplinary action.

Whilst schools are not the employer of supply teachers, they are still responsible for ensuring that allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher

due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies and the trust will discuss with the supply agency or agencies where the supply teacher is working across a number of schools or colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Where concerns or allegations relate to a trainee teacher placed within a school or college, the expectations of schools and colleges set out above also apply. In addition, teacher training providers are expected to follow the same procedures as set out for supply agencies.

18. Communication and confidentiality

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.

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.

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

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection, or prosecution of a serious crime. Before doing so, the DSL 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.

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.

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

19. Safer recruitment

The trust's full policy and procedures for safer recruitment are outlined in the Recruitment Policy.

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

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

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

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

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

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.

20. Single central record (SCR)

The trust will maintain a SCR.

The SCR will contain information on all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the trust, as well as members of the proprietor body. The information contained within the SCR will be recorded in such a way that allows for details for each individual academy to be provided separately, and without delay, to all who need to see it, including Ofsted.

The following information is recorded on the SCR, including dates that checks were completed as appropriate:

- 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
- A check of the individual's digital footprint (online search) and social media presence, where appropriate for the role

The trust will ensure that schools within the trust have appropriate procedures in place for ensuring that the necessary checks have been conducted by the employment business supplying any members of staff for agency and third-party supply staff, and that written confirmation has been received confirming this. This will amount to all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery, and the date that confirmation was received.

The SCR will also record:

- Any checks that have been conducted for volunteers.
- Any risk assessments that have been conducted to assess whether a volunteer should be subject to an enhanced DBS check.
- Written confirmation that supply agencies have completed all relevant checks.
- Any other information that the trust or its schools deem relevant to keep children safe.

The details of an individual will be removed from the SCR once they no longer work at the trust or any of its schools.

21. Monitoring and review

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

Any changes made to this policy will be communicated to all members of 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 **October 2027**

Appendix A - Specific Safeguarding Issues

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

Here are the issues covered:

1. [Domestic abuse](#)
2. [Homelessness](#)
3. [Children absent from education](#)
4. [Child abduction and community safety incidents](#)
5. [Child criminal exploitation \(CCE\)](#)
6. County Lines
7. [Cyber-crime](#)
8. [Child sexual exploitation \(CSE\)](#)
9. [Modern slavery and the National Referral Mechanism](#)
10. [Child Trafficking](#)
11. [Honour or Faith-based Abuse](#)
12. [FGM](#)
13. [Virginity testing and hymenoplasty](#)
14. [Forced marriage](#)
15. [Radicalisation](#)
16. [Pupils with family members in prison](#)
17. [Pupils required to give evidence in court](#)
18. [Mental health](#)
19. [Serious violence](#)

Domestic abuse

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

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

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

Schools will recognise that young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse can be referred to as ‘teenage relationship abuse’.

Homelessness

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

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

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

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

Children absent from education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Absent from Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

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

Admissions register

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.

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

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

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

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

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

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

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

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

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

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

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

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

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

Child abduction and community safety incidents

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

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

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors. Schools will teach pupils about personal safety through their RSHE curriculum and enhance this as required in response to local community knowledge.

Child criminal exploitation (CCE)

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

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

Specific forms of CCE can include:

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

The school 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. The school will also recognise that pupils of any gender are at risk of CCE.

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

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

County lines

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

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

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

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

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

Cyber-crime

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

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

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

Child sexual exploitation (CSE)

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

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

The school 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. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

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

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

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

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 including forced labour, slavery, servitude, forced criminality and the removal of organs.

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.

Child Trafficking – taken from the NSPCC

It's defined as recruiting, moving, receiving and harbouring children for the purpose of exploitation (HM Department for Education (DfE) and Home Office, 2011; Department of Health, Social Services and Public Safety and Police Service of Northern Ireland, 2011; Scottish Government, 2013; Wales Safeguarding Procedures Project Board, 2020).

Child trafficking is a form of modern slavery (HM Government, 2014).

Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another.

Children are trafficked for:

- [child sexual exploitation](#)
- criminal activity, including:
 - cannabis cultivation
 - street crime - such as pickpocketing, begging and bag theft
 - moving drugs
 - benefit fraud
 - immigration fraud
 - selling pirated goods, such as DVDs
 - forced marriage
- domestic servitude, including:
 - cleaning
 - childcare
 - cooking
- forced labour, including working in:
 - restaurants
 - nail bars
 - factories
 - agriculture
 - illegal adoption
 - unreported private fostering arrangements (for any exploitative purpose).

This list is not exhaustive and children who are trafficked are often exploited in more than one way.

Signs and indicators

Children who are trafficked are intentionally hidden and isolated from the services and communities who can identify and protect them. While identification may be difficult, there will be signs that you can watch for.

Children who have **been trafficked or are at risk of being trafficked** may:

- have to do excessive housework chores
- rarely leave the house and have limited freedom of movement
- not have any documents (or have falsified documents)
- give a prepared story which is very similar to stories given by other children
- be unable or reluctant to give details of accommodation or personal details
- not be registered with a school or a GP practice
- have a history with missing links and unexplained moves
- be cared for by adults who are not their parents or carers
- not have a good quality relationship with their adult carers
- be one among a number of unrelated children found at one address
- receive unexplained or unidentified phone calls whilst in a care placement or temporary accommodation.

Honour or Faith-Based Abuse

Honour or faith-based abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community. These include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. It is important that staff are aware that abuse committed in the context of preserving honour often involves a wider network or community pressure; therefore, staff must be aware of these dynamics and additional risk factors. If staff have a concern about a child who might be at risk of HBA or who has suffered HBA, they should speak to the school DSL who will then activate local safeguarding procedures, using existing national and local protocols or multi-agency liaison with police and children's social care.

FGM

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

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

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

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

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

Indicators that FGM may take place soon include:

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

All 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.

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

Virginity testing and hymenoplasty

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.

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

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

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

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

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

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

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a 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 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

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.

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

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

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

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

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

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

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

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

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

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils. If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

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

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

The school will support any victims to seek help by:

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

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

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

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

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

Radicalisation

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

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

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

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

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

The 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.

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.

The school’s procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in the Prevent Duty Policy. An individual will be required to provide their consent before any support delivered through the programme is provided.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. Staff in school will be able to see that pupils who have experienced parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse. Staff will understand that a tailored, trauma-informed and sensitive approach is required to mitigate potential harm and encourage stability. They will receive a copy of ‘[Are you a young person with a family member in prison?](#)’ from Action for Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in court

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

Pupils will be provided with the booklet ‘[Going to Court](#)’ from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental health

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.

Staff will be aware of observable behavioural changes that could indicate a mental health problem or suggest that the child is at risk of developing one. Possible warning signs that staff should be aware of include

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

Staff will understand that not every child who exhibits these behaviours will be suicidal or have a mental health concern; however, identifying these warning signs may help staff identify children who may be struggling and support vital early intervention and support.

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’ experiences can impact on their mental health, behaviour, and education.

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 DSLs.

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.

Serious violence

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

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

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

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

Staff will be aware of when violence may peak e.g. just before or after school and when pupils are traveling to and from school. Schools will look at how they can work with partners to promote safety for their pupils and will actively listen to pupils to establish when and where they feel unsafe. Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

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