Child Protection and Safeguarding Policy (including safer recruitment, allegations against staff and low-level concerns) 2026-2027

Review Cycle: Annually

Approved by: Trust Board

12 August 2026

Contents

1 Safeguarding Statement 3

UNICAT safeguarding statement 3

Child Protection Statement 3

2 Aims & principles of the policy 4

3 Legislation and statutory guidance 5

4 Definitions 5

5 Equality Statement 6

6 Academy Contexts 7

7 Roles and responsibilities 8

8 Confidentiality 13

9 Recognising abuse and taking action 14

10 Notifying Parents 26

11 Online Safety and Mobile Services 27

12 Pupils with Special Educational Needs and Disabilities 32

13 Pupils with a Social Worker 34

14 Looked after and Previously Looked After Children 34

15 Pupils who are lesbian, gay, bisexual or gender questioning 35

16 Supporting pupils who are questioning their gender 35

17 Young Carers 37

18 Complaints and Concerns about Academy Safeguarding Policies 37

19 Record Keeping 37

20 Training 38

21 Monitoring Arrangements 40

22 Links with other Policies 40

23 Policy Approval 41

Appendix 1: Additional Guidance and Legislation 41

Appendix 2: Types of Abuse 42

Appendix 3: Link Trustee and LGB Link Governors role for Safeguarding 43

Appendix 4: Safer Recruitment 47

Appendix 5: Local Safeguarding Partner Procedures and Escalation Policy 49

Appendix 6: Specific Safeguarding Issues 51

1 Safeguarding Statement

UNICAT safeguarding statement

"This statement of the University of Chichester Academy Trust's Child Protection Policy reaffirms the intent of the Trust and its Board to do everything in our power to ensure all the children in our care are protected from harm. It sets out the responsibilities of different people in each academy but makes clear our philosophy that every adult in our academies is responsible for ensuring our children and young people are safeguarded to the highest standards possible. I ask every one of you to think constantly about how you can improve your day-to-day practice to make sure our children are kept safe from harm. Please give the Policy your total and active support."

Jennese Alozie, CEO

Child Protection Statement

The University of Chichester Academy Trust Board recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to. We maintain an attitude of "it could happen here" where safeguarding is concerned. The purpose of this policy is to provide staff, volunteers, trustees and governors with the framework they need to keep children safe and secure in our academies and to inform parents and guardians how we will safeguard their children whilst they are in our care. Specific guidance is available to staff within the procedure documents contained in this policy.

While recognising its own legal responsibilities in the matter of child protection, the Trust Board requires all staff, pupils, parents and visitors to act safely and to co-operate in meeting these obligations. The Board believes that child protection is the responsibility of all adults. It will encourage employees to take an active role in ensuring that the highest standard of child protection is extended to all our pupils.

This policy will be reviewed annually by the Trust and noted by each Local Governing Body in the summer or early autumn terms, but by the end of September each year at the very latest. Local Governing Bodies have a responsibility to ensure the academy-related information in the policy remains current.

In our Trust we will educate and encourage pupils to keep safe through the content of the curriculum and an ethos which helps children to feel safe and able to talk freely about their concerns, secure in the knowledge that they will be listened to and valued.

1.1 Important Trust contacts

Role	Name	Contact
CEO	Jennese Alozie	01243 793500
MAT Designated Safeguarding Lead & DCEO (MDSL)	Natalie Broad	safeguarding@chimat.uk 01243 793500
MAT Deputy Designated Safeguarding Lead (MDDSL)	Emma Cornish	safeguarding@chimat.uk 02392373432
MAT Deputy Designated Safeguarding Lead (MDDSL)	Callie Evans	safeguarding@chimat.uk 01420 472132
Director of People & Culture	Peter Waller	01243 793500
Trustee with responsibility for safeguarding	Ali Powell	01243 793500

1.2 Important Academy contacts

Role	Name	Contact
Designated Safeguarding Lead (DSL)	Callie Evans	c.evans@oakmoor.hants.sch.uk 01420 472132
Deputy Designated Safeguarding Lead (DDSL)	Lucy Riva-Williams	l.riva@oakmoor.hants.sch.uk 01420 472132
Deputy Designated Safeguarding Lead (DDSL)	Nigel Wright Claire Conley-Harper Adam Beere Alison Woodage Rob Riley	n.wright@oakmoor.hants.sch.uk C.Conley-Harper@oakmoor.hants.sch.uk a.beere@oakmoor.hants.sch.uk a.woodage@oakmoor.hants.sch.uk r.riley@oakmoor.hants.sch.uk
Headteacher	Nigel Wright	n.wright@oakmoor.hants.sch.uk
Designated Teacher	Callie Evans	c.evans@oakmoor.hants.sch.uk 01420 472132
Local Authority Designated Officer (LADO)		LADO@hants.gov.uk
LGB Link Governor with responsibility for safeguarding	Lisa Conway	l.conway@oakmoor.hants.sch.uk
Channel helpline		020 7340 7264

2 Aims & principles of the policy

- To provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities
- To ensure consistent good practice across the Trust and its academies

- All children regardless of age, gender including trans gender, race, disability, sexuality, religion and non-religion, culture or language have a right to be protected from harm
- All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the academy or in the community
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children
- Whilst the Trust and its academies will work openly with parents as far as possible, we have the responsibility and the right to contact children's social care or the police, without notifying parents if this is believed to be in the child's best interests

3 Legislation and statutory guidance

This policy is based on the statutory guidance from the Department for Education.

- Keeping Children Safe in Education
- Working Together to Safeguard Children
- What to do if you are worried about a child being abused
- Academy trusts: governance guide

We comply with this guidance and the arrangements agreed and published by our local safeguarding partners. This policy also complies with our funding agreement. Please see appendix 1 for more information.

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

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

4 Definitions

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

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

Child Protection is an aspect of safeguarding but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm. This includes harm that occurs inside or outside the home, including online.

Child/children includes everyone under the age of 18.

DSL – Designated Safeguarding Lead

DDSL – Deputy Designated safeguarding Lead

Parent refers to birth parents and other adults in a parenting role for example adoptive parents, stepparents, guardians and foster carers.

Staff applies to all those working for or on behalf of the academy, full time or part time, in either a paid or voluntary capacity. This also includes parents, governors and trustees.

Abuse could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care. Appendix 2 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 2 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

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

Perpetrator or Alleged Perpetrator are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

5 Equality Statement

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

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 13)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 15)
- Are missing or absent from education for prolonged periods and/or frequently absent from school
- Whose parent/carer has expressed an intention to remove them from school to be home educated

6 Academy Contexts

We recognise that in order for safeguarding to be effective in our academies their local context must be understood in terms of families, the wider community, and its location.

DSLs will ensure the staff at each academy receive training appropriate to their context e.g. if there is a County Line or other gangs operating in the community training will be given on recognising the signs that children are being groomed for criminal exploitation.

We recognise the wider societal issues and potential harms that our children are facing. We understand that downplaying some behaviours related to harassment and abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Therefore, all staff will receive training to recognise the effects of child-on-child abuse in its many forms including sexual harassment and sexual violence, online sexual abuse and identifying early signs of child-on-child sexual abuse. Staff will be expected to consistently uphold standards in their responses to sexual harassment and online sexual abuse in partnership with parents and carers.

Additionally, all UNICAT academies have an age-appropriate Personal, Social and Health Education (PSHE) curriculum which includes anti-bullying lessons alongside Relationships, Sex and Health Education to promote healthy, respectful relationships. Opportunities to teach about specific safeguarding issues are taken through lessons for example about the concepts and laws relating to sexual consent and sexual exploitation as outlined in Keeping Children Safe in Education.

We recognise that risks of harm can be compounded where children with protected characteristics, particularly those who are LGBT, lack a trusted adult with whom they can be open. Therefore, we encourage the provision of safe spaces and forums in schools where their voices and concerns can be heard.

7 Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, governors and trustees in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The academies play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

7.1 All staff

All staff must read Part One of Keeping Children Safe in Education. Staff who work directly with children are also expected to read and understand Annex A of KCSIE (about specific safeguarding issues).

All staff will:

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

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and DDSLs, the academy behaviour policy, the academy online safety policy and the safeguarding response to children who go missing from education/who are absent from education
- Be aware of the academy's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority for children's social care and statutory assessments that may follow a referral, including the role they might be expected to play.
- The process for community based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
    - Drug taking and/or alcohol misuse
    - Unexplainable and/or persistent absences from education
    - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
    - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims is that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be vulnerable to discriminatory bullying
- That a child and their family may be experiencing multiple needs at the same time.
- What to look for to identify children who need help or protection

7.2 The Designated Safeguarding Lead (DSL)

MAT DSL

The Deputy CEO fulfils the role of Trust Safeguarding Lead and Multi-Academy Trust Designated Safeguarding Lead (MAT DSL). Supported by two Deputy MAT DSLs and the Executive Team, they provide strategic leadership and oversight of safeguarding across the Trust.

- Report on findings of the annual review of filtering & monitoring to the Trust Board
- Complete an annual safeguarding audit and action monitoring
- Provide advice and support to other staff on child welfare and child protection matters
- Report to the Safeguarding Link Trustee and executive team

Academy DSL

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

All academies have a Designated Safeguarding Lead (DSL) and one or more Deputy DSLs. Every academy should prominently display their named photos and safeguarding procedures so that parents, LGB, Trustees, Trust Central Teams and any other visitor can easily identify who to inform of any safeguarding concerns.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Arrangements to cover this role must be made for out of hours and offsite activities. When the DSL is absent, the deputy DSLs will act as cover. If the DSL and Deputy DSLs are not available or absent, cover arrangements will be in place. This includes a shared safeguarding@ inbox so other staff can act on safeguarding concerns.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Make sure that staff have appropriate Prevent training and induction
- Have a good understanding of the filtering and monitoring systems and processes in place within the academy
- Complete an annual formal review of filtering & monitoring, reporting findings to the Headteacher, MDSL and Head of IT during the annual safeguarding audit
- Record actions and outcomes of the review

The DSL will also:

- Keep the headteacher informed of any issues

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Maintain oversight of records relating to staff safeguarding training, including ensuring all staff have read and understood Part One and Annex A (where appropriate) of KCSiE and Part Three of KCSiE where it is a necessary part of their role (This will be undertaken by the People Team for Central Team employees)

The full responsibilities of the MDSL, DSL and DDSLs are set out in their job description.

7.3 The Trust Board and the Local Governing Body (LGB)

The **Trust Board** will:

- Evaluate and approve the Trust Safeguarding & Child Protection policy at each review, ensuring it complies with the law, and hold the Trust to account for its implementation
- Appoint a senior board level lead to monitor the effectiveness of this policy in conjunction with the full Trust Board. This is always a different person from the MAT DSL or academy DSL
- Ensure that all staff who work directly with children read at least part 1 of Keeping Safe in Education (KCSIE) and those who staff who do not work directly with children read part 1 of KCSIE
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Ensure that the Trust and academies have appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
    - Making sure that the leadership teams and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

The **Local Governing Body** will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve the academy's Safeguarding and Child Protection Policy at each review, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

- Appoint a LGB Link Governor for safeguarding to monitor the effectiveness of this policy. This is always a different person from the MAT DSL or academy DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The academy has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors)
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

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

All trustees and governors will read Keeping Children Safe in Education in its entirety.

Section 20.3 of this policy and Appendix 3 has information on how trustees and governors are supported to fulfil their role.

7.4 The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems that support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable in EYFS settings
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the EYFS setting

7.5 Virtual School Heads

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

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

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

8 Confidentiality

We maintain that all matters relating to child protection are to be treated as confidential and only shared as per the 'working together' guidance. We acknowledge that timely information sharing is essential to effective safeguarding.

There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection. Information is to be shared with individuals within the Trust who 'need to know'.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.

Staff should never promise not to tell anyone about a report of abuse, as this may not be in the child's best interests.

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 20.

9 Recognising abuse and taking action

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

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home

- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

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

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

Tell the Academy DSL as soon as possible if you make a referral directly.

There is also a GOV.UK webpage for reporting child abuse to your local council: https://www.gov.uk/report-child-abuse-to-local-council

9.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 11.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
- Bear in mind that some children may:

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

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

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

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

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 7 of this policy.

Any teacher who either:

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

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

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

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

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

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

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

Figure 1 below, before section 9.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

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

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

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

Early Help Assessment

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

and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

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

Referral

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

If you make a referral directly, you must tell the DSL as soon as possible.

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

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

Add details of your local procedures for referral and escalation.

9.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority

children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

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

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

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

9.6 If you have a concern about mental health

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

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

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

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 10.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

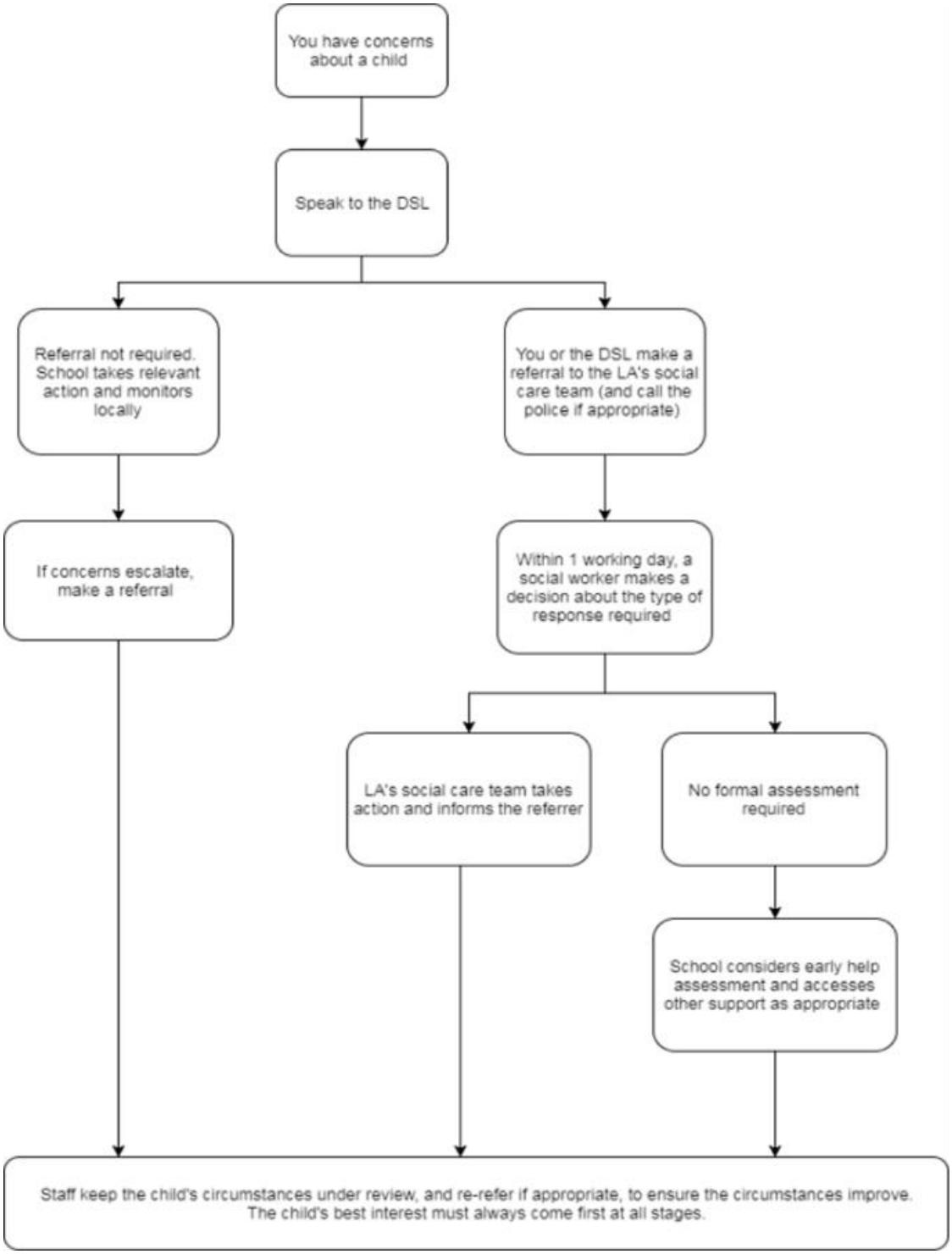
If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

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

Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

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

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



9.7 Concerns about a staff member, supply teacher, volunteer or contractor

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

The headteacher/Trust will then follow the procedures set out in the Trust's Allegations Against Staff Policy.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

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

Within early years settings, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

9.8 Allegations of abuse made against other pupils

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

All child-on-child abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 7 for more information about child-on-child abuse.

Procedures for Dealing with Allegations of Child-on-child Abuse

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

Creating a Supportive Environment in School and Minimising the Risk of Child-on-child Abuse

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 10.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

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

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

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

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

9.9 Sharing of Nudes and Semi-nudes ('Sexting')

Your Responsibilities When Responding to an Incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

Initial Review Meeting

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

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

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

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

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

Further Review by the DSL

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

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

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

Informing Parents/carers

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

Referring to the Police

If it is necessary to refer an incident to the police the DSL will follow the academy protocols.

Recording Incidents

All incidents of sharing nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The academy record-keeping arrangements also apply to the recording of these incidents.

Curriculum Coverage

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

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

Pupils also learn the strategies and skills needed to manage:

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

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

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

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

9.10 Reporting Systems for our Pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide. Where appropriate, academies will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or report of abuse. Other staff will only talk to parents about any such concerns following consultation with the DSL.

At times advice may be sought from Local Safeguarding Partners through a no-names referral or we believe that notifying the parents could increase the risk to the child. In both cases we would follow Children's Services advice as to when and if to notify parents of a safeguarding concern.

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

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

To achieve this, we will:

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

10 Notifying Parents

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

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

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

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

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

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

11 Online Safety and Mobile Services

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material. We also recognise that technology is a significant component in many safeguarding and wellbeing issues, and that children may be at risk of harm online as well as face to face.

This section reflects Keeping Children Safe in Education 2026, which requires schools and trusts to take a whole-school approach to online safety, including considering content, contact, conduct and commerce risks, appropriate filtering and monitoring, mobile and smart technology, staff training and parental engagement.

The Trust also has regard to the Department for Education's Mobile phones in schools' statutory guidance which states that schools should be mobile phone-free environments by default, with exceptions only, and should prohibit pupil use of mobile phones throughout the school day, including lessons, movement between lessons, breaktimes and lunchtimes. See the Trust mobile phone policy for more detail.

For the purposes of this policy, mobile devices include mobile phones, smartphones, tablets, smart watches, wearable technology, personal laptops, cameras, gaming devices and any other device capable of communication, internet access, notifications, image capture, audio/video recording or data storage.

To address online safety and mobile device risks, our Trust aims to:

- have robust processes, including filtering and monitoring systems, in place to support the online safety of pupils, staff, volunteers, governors/trustees and visitors
- protect and educate the whole school community in the safe, responsible and lawful use of technology, including mobile and smart technology
- set clear guidelines for the use of mobile phones and smart devices across the whole Trust community
- ensure pupils are not able to use personal mobile phones during the school day unless a specific exception has been approved
- recognise that staff may need limited use of mobile phones for legitimate professional reasons, including emergencies, multi-factor authentication, urgent school communications and safeguarding or operational matters
- work with parents and carers to support a mobile-phone-free school day, reinforce safe online behaviour at home and ensure concerns about online safety or mobile phone use are reported promptly
- establish clear mechanisms to identify, intervene in and escalate online safety, mobile device, filtering, monitoring or safeguarding concerns

Our approach to online safety is based on the following categories of risk. The Trust recognises that the online risk landscape is constantly changing as technology, platforms, online behaviours and emerging threats develop. This list is therefore not exhaustive and will be reviewed and updated as new risks are identified:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, drugs, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation, fake news and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users, including generative AI applications that simulate interaction with another person, such as child-to-child pressure, commercial advertising, or adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending or receiving explicit images, consensual and non-consensual sharing of nudes or semi-nudes, including images that have been altered or wholly generated using artificial intelligence, such as deepfakes or "deep nudes", sharing pornography or engaging in online bullying
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing, financial scams and other online exploitation

11.1 Pupils use of Mobile Phones and Smart Devices

The Trust's position is that pupils must not use personal mobile phones or smart devices during the school day unless a specific exception has been approved by the Headteacher or a delegated senior leader.

Where pupils are permitted to bring a mobile phone to school, the academy will set local arrangements for how phones are managed. This may include requiring phones to be switched off and kept in bags, handed in at the start of the day, stored securely, or managed through another approved local process.

Pupils must not use personal mobile devices to:

- access social media, messaging apps, games or other non-approved services during the school day
- bypass Trust filtering or monitoring using mobile data, VPNs, proxies, tethering or hotspots
- take, store or share images, video or audio of pupils, staff, visitors or school activities without permission
- bully, harass, intimidate, pressure or abuse others
- access, create, store or share harmful, sexual, violent, extremist, discriminatory or illegal content
- record lessons, conversations, incidents or meetings unless explicitly authorised for an approved educational, medical or accessibility purpose

KCSIE 2026 recognises that many children have unlimited and unrestricted access to the internet through mobile networks such as 3G, 4G and 5G, and that this can enable bullying, sexual harassment, controlling behaviour, sharing indecent images, viewing pornography and accessing other harmful content while at school.

11.2 Exceptions and reasonable adjustments

The Trust recognises that there may be legitimate reasons why a pupil may need access to a mobile phone or smart device.

Exceptions may include:

- medical needs, such as diabetes monitoring or other health-related apps
- SEND, disability or accessibility needs
- young carer responsibilities
- safeguarding or welfare arrangements agreed by the academy
- travel safety arrangements before or after school
- specific educational activities approved by a senior leader
- residential visits or off-site activities where controlled access is appropriate

Any exception must be considered case by case, documented, proportionate and reviewed regularly. DfE guidance confirms that schools must comply with legal duties, including reasonable adjustments under the Equality Act 2010 and arrangements to support pupils with medical conditions under the Children and Families Act 2014. The guidance gives the example of pupils with diabetes using continuous glucose monitoring linked to a mobile phone.

Where an exception is agreed, access should be limited to the specific purpose, time and location required. An exception does not give a pupil unrestricted permission to use a mobile phone during the school day.

11.3 Searching, confiscation and safeguarding concerns

Where there is a reasonable concern that a mobile device may contain evidence of harm, abuse, bullying, sexual content, criminal activity, radicalisation, exploitation or another safeguarding concern, staff must follow the academy's safeguarding procedures and seek advice from the DSL or a senior leader.

DfE guidance confirms that headteachers, or authorised staff, have statutory powers to search a pupil or their possessions where they have reasonable grounds to suspect possession of a prohibited item, or an item identified in the school rules as searchable. DfE mobile phone guidance also states that mobile phones and similar devices can be identified in the Behaviour Policy as items that may be searched for.

Staff must not unnecessarily view, copy, forward or share harmful, sexual or illegal content found on a device. Where nude or semi-nude images, suspected child sexual abuse material, extremist content or criminal material may be involved, the DSL must be informed immediately and external advice sought where appropriate.

11.4 Generative artificial intelligence and synthetic media

Generative artificial intelligence tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with tools such as ChatGPT, Microsoft Copilot, Google Gemini and other AI-enabled services.

The Trust recognises that AI can support teaching, learning, accessibility, administration and workload reduction. However, it can also facilitate harm, including bullying, grooming, impersonation, misinformation and the creation of harmful or misleading images, audio and video, including deepfakes.

AI tools may be used to create manipulated, sexualised or nude images of children or adults, sometimes referred to as 'nudification', 'deep nudes' or synthetic intimate imagery. Such material may be created

from an existing photograph or generated entirely by AI. Regardless of how it is produced, it can cause significant harm and may constitute child-on-child abuse, sexual harassment, image-based abuse, child sexual abuse material or a criminal offence. KCSIE 2026 expressly recognises that nude or semi-nude imagery may be digitally altered or wholly generated using AI.

The Trust and its academies will treat any use of AI to access harmful content, create harmful material, bully or blackmail another person, impersonate others, or generate abusive, sexual, discriminatory or deliberately misleading content in line with the individual academies Behaviour Policy, Staff Code of Conduct and Dignity at Work Policy. Where children are involved, the matter will also be treated as a safeguarding concern and managed under the Child Protection and Safeguarding Policy.

11.5 Protecting photographs and recordings

Before taking, publishing or sharing photographs or recordings of pupils, staff must consider whether an identifiable image is necessary and whether the same purpose could be achieved without showing a pupil's face.

Where images are used, academies should take proportionate steps to reduce the risk of scraping, unauthorised sharing and AI manipulation. These should include:

- using approved Trust devices, systems and storage locations;
- confirming that appropriate consent is in place and considering the wishes of the child, where they have sufficient understanding;
- avoiding the publication of a pupil's full name alongside their image;
- avoiding information that may reveal a pupil's location, timetable, safeguarding status, routines or other identifying details;
- using photographs taken from a distance, from behind or over the shoulder where a clearly identifiable face is unnecessary;
- considering cropping, blurring or lower-resolution images where appropriate;
- removing location, device, date and time metadata, including EXIF data, before publication;
- applying suitable privacy and access settings and limiting publication to closed platforms where public access is unnecessary;
- considering proportionate protective measures such as watermarking, while recognising that these cannot completely prevent copying or manipulation; and
- regularly reviewing websites, social media accounts and promotional material and removing outdated images, including images of pupils who have left the academy, where there is no continuing need to retain them.

Photographs and recordings must not be stored on personal devices, personal cloud accounts or unauthorised applications. Access to image libraries must be restricted to authorised staff and images must be retained only for as long as required under the Trust's Records Retention Policy. Parents/carers should be given clear information about how images may be used, the risk of online manipulation and how consent may be withdrawn. The supporting image-security guidance recommends data minimisation, restricted visibility, metadata removal, lower-resolution images, alternative camera angles and regular image audits.

11.6 Responding to manipulated or abusive images

Any incident involving AI-generated abuse, deepfakes, manipulated imagery, nudification applications or other synthetic media involving a child must be reported immediately to the DSL or a deputy. Staff must not search for, copy, download, forward or unnecessarily view suspected illegal imagery. They must not ask a pupil to send or reproduce it.

Relevant messages, links and devices should be preserved without further sharing, and the DSL should seek advice from the police or other appropriate agencies. Where an original pupil image has been taken from an academy website or social media account, the academy should remove the publicly available original while preserving an appropriate record of the incident. Any affected pupil must be reassured, supported and must not be blamed or made to feel ashamed.

The DSL will consider the child's immediate safety and emotional wellbeing, the risk of continued circulation, evidence preservation, parental involvement, data-protection reporting requirements and referrals to children's social care, the police or specialist removal services. Threats or demands for payment must not be engaged with and must be referred to the police. Guidance identifies services including Childline/IWF Report Remove for under-18s and StopNCII for non-consensual intimate images involving adults. KCSIE also states that staff should not view or forward illegal images and that devices may need to be preserved for police examination.

Staff must follow the Trust's AI Policy when using AI tools. Personal data, safeguarding information, confidential information or pupil-identifiable information must not be entered into an AI tool unless the tool has been formally approved for that purpose and the use is consistent with data-protection requirements.

Filtering and monitoring requirements also apply to AI services. In line with KCSIE 2026, the Trust will assess risks associated with AI-generated content, deepfakes and emerging technologies as part of its online-safety arrangements. Appropriate filtering and monitoring systems will be reviewed at least annually by the relevant senior leader, supported by the DSL and IT teams. This will include checks that filtering is operating effectively across all Trust-managed, internet-connected devices and locations. A written record of each review, identified risks and any actions taken will be maintained at academy and Trust level.

11.7 Staff use of mobile phones and personal devices

Staff may bring personal mobile phones and smart devices onto school premises; staff should not use their own mobile phone for personal reasons in front of pupils throughout the school day. Personal use must normally be restricted to non-contact time and must not take place in front of pupils.

The Trust recognises that staff may occasionally need to use a personal mobile phone during the school day for legitimate professional purposes, including:

- emergency communications or contacting emergency services
- contacting senior leaders or the school office
- responding to urgent safeguarding, health and safety or operational matters
- accessing multi-factor or passwordless authentication
- accessing approved school systems where no Trust device is reasonably available
- supporting off-site visits, educational trips, PE activities or emergency procedures

Any such use must be professional, proportionate and limited to the purpose required. Personal devices should only be used in front of pupils where there is a clear operational, safeguarding, emergency or authorised work-related reason.

Staff must not use personal mobile phones, smart watches, cameras or other personal devices to take photographs or make video or audio recordings of pupils. Where images or recordings are required for an approved educational, safeguarding, communication or operational purpose, staff must use authorised school devices, systems and storage locations.

Staff must not use personal devices to:

- store pupil images, recordings, personal data or safeguarding information
- communicate privately with pupils
- transfer information outside approved Trust systems
- bypass Trust filtering, monitoring or security controls
- use personal messaging applications for official communication with pupils or parents, unless formally authorised
- record meetings, conversations or incidents without a lawful basis and appropriate authorisation

All photographs, recordings and personal data must be managed in accordance with UK GDPR, the Data Protection Act 2018 and the Trust's safeguarding, consent and records-retention requirements.

Any accidental capture, storage, disclosure or sharing of pupil information on a personal device must be reported immediately as a safeguarding and/or data protection concern.

Further requirements are set out in the Staff Code of Conduct, Acceptable Use Policy, Data Protection Policy and Records Management Policy, Mobile Phone and Smart Device Policy where applicable.

12 Pupils with Special Educational Needs and Disabilities

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

Our academies offer a variety of extra pastoral support for pupils with SEN and disabilities.

Any abuse involving pupils with SEND will require close liaison with the DSL (or DDSL) and the SENCO.

12.1 Pupils with medical condition

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

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

12.2 Pupils accessing Alternative Provision (AP)

The Trust recognises that it retains responsibility for the safeguarding and welfare of pupils placed in Alternative Provision (AP), regardless of where the education is delivered.

Prior to any placement, the academy will satisfy itself that the Alternative Provision has appropriate safeguarding arrangements in place, including child protection policies, safer recruitment procedures, staff training and effective safeguarding leadership.

The academy will establish clear information-sharing arrangements with the Alternative Provision provider to ensure relevant safeguarding, attendance, behaviour, SEND, medical and welfare information is shared appropriately and in a timely manner.

The academy will maintain regular contact with the provider and monitor the pupil's attendance, educational progress, behaviour, engagement, wellbeing and safety throughout the placement. Any safeguarding concerns will be communicated immediately between the provider, the academy and other relevant agencies where required.

The academy will regularly review the suitability and effectiveness of the placement and ensure that appropriate support is in place to meet the pupil's educational, pastoral and safeguarding needs. Safeguarding responsibilities will remain a standing consideration throughout the duration of the placement.

12.3 Attendance as a safeguarding issue

The Trust recognises that attendance, absence and missing education are important safeguarding indicators. Whilst a child missing from education is a potential sign of abuse, neglect or exploitation, children who are persistently absent or severely absent from education may also be at increased risk of harm.

The Trust will monitor attendance carefully and take appropriate action where concerns arise. Staff should be aware that poor attendance, persistent absence or severe absence may be linked to safeguarding concerns including child sexual exploitation, child criminal exploitation, serious violence, mental health difficulties, neglect, domestic abuse, substance misuse, forced marriage, female genital mutilation, radicalisation or other forms of abuse.

The academy will work proactively with pupils, families and external agencies to identify and address barriers to attendance at the earliest opportunity. Where attendance concerns indicate a potential safeguarding risk, staff must report these concerns to the DSL and safeguarding procedures will be followed.

The academy will maintain an attendance culture that promotes the importance of regular attendance and recognises that a child who is absent from education, whether through persistent absence, severe absence or becoming missing from education, may require additional support and intervention to safeguard their welfare.

Where a pupil is absent unexpectedly, persistently absent, severely absent or is missing from education, the academy will make reasonable enquiries to establish the pupil's whereabouts and wellbeing and will work with local authority services and safeguarding partners where appropriate.

The DSL will maintain oversight of attendance patterns to identify emerging safeguarding concerns and will ensure that attendance information is considered alongside other indicators of vulnerability when assessing risk and planning support for children and families. If the whereabouts of a child is unknown and they are deemed missing from education, the local authority will be informed according to their local procedures and 'Children Missing Education: Statutory Guidance for Local Authorities'.

We are alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Where reasonably possible the school should hold more than one emergency contact number for each pupil.

13 Pupils with a Social Worker

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

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

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

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

14 Looked after and Previously Looked After Children

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

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

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

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

As part of their role, the designated teacher will:

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

15 Pupils who are lesbian, gay, bisexual or gender questioning

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

Any concerns should be reported to the DSL.

16 Supporting pupils who are questioning their gender

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

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

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

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

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

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

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

16.2 Considering requests for support with social transition

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

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

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

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

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

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

16.3 Rules on single-sex spaces

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

16.4 Rules on single-sex sports

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

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

17 Young Carers

The academy recognises that young carers may face additional barriers to attendance, wellbeing and educational achievement. Where a child is identified as a young carer, appropriate pastoral support, early help and external agency support will be considered.

18 Complaints and Concerns about Academy Safeguarding Policies

18.1 Complaints against Staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff and in line with section 4 of Keeping Children Staff in Education

18.2 Other Complaints

Complaints of any safeguarding concerns e.g. bullying will be taken seriously and where possible resolved by the class teacher or a member of leadership. If this is not possible the formal complaint stages set out within the UNICAT Complaints Policy should be followed.

18.3 Whistleblowing

The whistleblowing policy covers how staff report concerns regarding the way the academy safeguards pupils, including poor or unsafe practice, or potential failures.

19 Record Keeping

We will hold records in line with our records retention schedule set out in our Records Management Policy.

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

Records will include:

- A clear and comprehensive summary of the concern

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

Concerns and referrals will be kept in a separate child protection file for each child.

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

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

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

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

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

Where individual children do not transfer to another school or college, the safeguarding records will be retained until the pupil reaches 25 years of age at which point they will be reviewed and securely disposed of if there is no ongoing reason to retain them. Records may only be kept beyond this point if there is an ongoing legal case.

All academies use CPOMs, which is an online system to record safeguarding related information.

20 Training

20.1 All Staff

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

This training will be regularly updated and will:

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

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

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

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

Volunteers will receive appropriate training, if applicable.

Academies are responsible for recording and maintaining training records for their members of staff. Training records for Central Team members will be maintained by the relevant line manager and National College records.

20.2 The DSL and DDSLs

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

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

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

20.3 Trustees and Governors

All trustees and governors receive annual training about safeguarding and child protection (including online safety) alongside induction, which is regularly updated. This is to make sure that they:

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

Termly network meetings for link governors, the link trustee and the Trust Lead for Safeguarding provide further opportunities for development of safeguarding practice.

20.4 Recruitment – Interview Panels

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

Members of staff involved with recruitment activities within their academy or team are to ensure that they have read and familiarised themselves with the Safer Recruitment section of KCSiE.

All recruitment activities will be aligned with the requirements of KCSiE and details can be found in the Trust Recruitment and Selection Policy.

20.5 Staff who have Contact with Pupils and Families

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

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

21 Monitoring Arrangements

The UNICAT Safeguarding and Child Protection Policy will be reviewed annually in July by the MAT DSL and Strategic Safeguarding Team. At every review, it will be approved by the Board of Trustees. The Trust policy will be used as the basis for the academies Safeguarding and Child Protection Policy with local context and procedures added. This will be approved by the LGB at their first meeting of the academic year.

22 Links with other Policies

This Policy must be read alongside

Trust Policies:	**Academy Policies:**
• SCITT Child Protection and Safeguarding Policy • AI Policy • Allegations Against Staff Policy • Allergy and Anaphylaxis Policy • Anti Bullying Policy • Complaints Policy • Health & Safety Policy • Mobile Phone and Smart Device Policy • Recruitment and Selection Policy • Staff Code of Conduct • Supporting Pupils with Medical Conditions • Whistleblowing Policy (Public Interest Disclosure Act)	• Attendance Policy • Behaviour Policy • Curriculum Statement • Equality, Diversity and Inclusivity Policy • First Aid Policy • Online Safety Policy • Relationships and Sex Education Policy

23 Policy Approval

The Safeguarding & Child Protection Policy is reviewed on an annual basis or soon if there is a significant change to guidance or practice. As this policy is a Trust wide policy, it is approved by the Trust Board. Section 2.2 has been adapted to reflect the academy context.

Appendix 1: Additional Guidance and Legislation

This policy is also based on the following legislation:

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

- For all academies with pupils under 8 years old: The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children
- For all academies with nurseries, this policy also meets the requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

Appendix 2: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

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

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

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

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

Appendix 3: Link Trustee and LGB Link Governors role for Safeguarding

Trust Board

The Trust Board will appoint a lead for safeguarding; this Safeguarding Link Trustee will take the strategic lead on behalf of the Trust Board. This trustee role is the Trust Boards main point of contact with the Mat DSL (MDSL); it should keep the Board updated with statutory safeguarding and child protection guidance. The Trust Board retains collective responsibility for safeguarding across the Trust.

This Safeguarding Link Trustee role should make sure the Trust has an appointed MDSL from the senior leadership team, who has appropriate status and authority to carry out their duties. They should meet with the MSDL termly to make sure the Trust has effective safeguarding protocols and policies in place and ask the MDSL the right strategic monitoring questions with challenge and to establish assurance of risk and compliance:

- **Safeguarding Assurance**:
    - The annual safeguarding audits are reporting strong levels of compliance and academy support where necessary is identified
        - Engage with the Trust data to maintain strategic oversight of the levels of support and concern, spot trends to inform ongoing improvement
        - Understand the Trust's and academies safeguarding strengths and areas for development, progress made with the strategic development priorities for safeguarding
    - Local safeguarding partners, other organisations, agencies are working together effectively for the benefit of the children
    - All central team staff and trustees have had and completed the appropriate level of training
    - Strategic oversight of the central team Single Central Record (SCR), ensuring SCR checks are happening by the senior leadership and are compliant.

- **Filtering and Monitoring**:
    - The Trust has appropriate online filtering and monitoring systems in place for the Trust and its academies, and they are effective in safeguarding pupils and staff
    - The DfE's filtering and monitoring standards has been reviewed with the MSDL and Head of IT.

- **Trust Board Reporting**:

- Produce a termly visit report to present at the termly Curriculum and Standards Committee
- Share the report with MDSL before sending to the Governance Professional for circulating to Trustees

- **Local Governance**
  - Building productive working relationships with our Trust wide LGB Link Governors for safeguarding through termly network meetings. Understand the strengths and areas for development in the academy's safeguarding practices
  - Maintaining transparency and effective communication with local governance

Local Governing Body

The Trust Board delegate the specific Academy monitoring of safeguarding to the Local Governing Body (LGB), who appoint a Link Governor for safeguarding. This link role is the LGB's main point of contact with the DSL; it should keep the LGB updated with statutory safeguarding and child protection guidance.

This Safeguarding Link Governor role should make sure the academy has an appointed DSL from the senior leadership team, who has appropriate status and authority to carry out their duties. The Link Governor should meet with the DSL termly to make sure the academy has an effective Safeguarding and Child Protection Policy, and procedures engage in monitoring activity, attend the academy setting, speak to stakeholders and observe safeguarding culture as experienced in the academy.

The termly monitoring visits should follow the **Link Governor Business Calendar Agendas** and ask the DSL the right monitoring questions with challenge and to establish assurance of risk and compliance:

- **Safeguarding Assurance (Academy Level)**
  - Make sure the DSL has additional time, funding, training, resources, and support to carry out the role effectively
  - All staff and governors have had and completed the appropriate level of training
  - The academy has appointed a designated teacher to promote educational achievement of looked-after and previously looked-after children (LAC), and that this person has appropriate training
  - There are clear procedures in place for dealing with allegations against staff, handling reports of child abuse, protecting children from risk of radicalisation, children who are absent from education, particularly on repeat occasions and/or prolonged periods, and identifying concerns for female genital mutilation (FGM) and mental health
  - Principles for sharing information, including special category data with the relevant safeguarding partners, other organisations, agencies and practitioners are applied consistently and risk management is robust
  - Site security is maintained, and assurances where external operators are providing services or activities have appropriate safeguarding and child policies and procedures in place, including any alternative provision

- **Safer Recruitment:**

- Strategic oversight of the Single Central Record (SCR), ensuring SCR checks are happening by the senior leadership and are compliant. (The governor does not do the SCR check themselves as that is an operational function for the academy)
- Governor SCR records are compliant
- School leaders are trained in safer recruitment to meet the interview panel membership requirement

- **Teaching and Learning:**
  - The curriculum covers safeguarding, including online safety, which should be a running and interrelated theme in your whole school approach to safeguarding and related policies/procedures
  - This education is personalised or contextualised for the more vulnerable children where needed
  - The filtering and monitoring processes on school devices and school networks are effective and checked annually to ensure we keep pupils safe online

- **Local Governing Body Reporting**:
  - Produce a written visit report to present at the next termly LGB Core Business meeting using the Governor Visit template
  - Share the report with DSL and Headteacher before sending to the Partnership Governance Professional for circulating to governors.

- **Trust Governance:**
  - Building productive working relationships with the Link Trustee for safeguarding via attendance at termly network meetings
  - Maintaining transparency and effective communication with trust governance.

Support for the Link Trustee and Link Governor Role for Safeguarding

To support the link roles to understand their respective roles and responsibilities, including any legal and statutory duties for the Trust and its academies, a range of training and support activities are offered across each academic year.

There is an expectation that each role will participate in relevant personal development to improve skills and knowledge in safeguarding.

** This training is mandatory to undertake the Link roles

Induction	**All Trustees & Governors**	**Link Trustee & Link Governor**

Safeguarding Policy **	KCSiE annual update **	Termly Network meetings with Mat DSL **
Academy safeguarding protocols and meet DSL **	Cyber Security Training **	Academy Staff INSET day invitation
Mandatory Safeguarding and Prevent training (National College) **	Mandatory Safeguarding & Prevent training (National College) **	GovernorHub e-learning modules on the role of a safeguarding link governor

Appendix 4: Safer Recruitment

The University of Chichester Academy Trust is committed to safeguarding and promoting the welfare of children and young people. Safer recruitment is an essential part of the Trust's safeguarding culture and is embedded throughout all recruitment and selection activities.

The Trust's detailed safer recruitment arrangements are set out in the Recruitment and Selection Policy, which should be read alongside this Safeguarding and Child Protection Policy. The Recruitment and Selection Policy incorporates the safer recruitment requirements previously included in this appendix and provides the Trust-wide framework for recruitment, selection, pre-employment checks and Single Central Record requirements.

The Recruitment and Selection Policy applies to employees, SCITT staff and trainees, trustees, members, local governors, volunteers, agency and supply staff, contractors, consultants, peripatetic staff, casual workers, temporary workers and fixed-term workers.

In line with statutory guidance and Trust procedures, the Trust will ensure that recruitment decisions are fair, objective, evidence-based and free from unlawful discrimination, and that safeguarding is considered at every stage of the appointment process. No recruitment activity should begin until the appropriate staffing request approval has been obtained.

The Trust's safer recruitment processes include, where applicable:

- ensuring that job descriptions and person specifications include safeguarding responsibilities
- including the Trust's safeguarding commitment in recruitment advertising
- requiring applicants to complete an application form and provide a full employment history
- considering gaps, inconsistencies and concerns during shortlisting
- carrying out online searches on shortlisted candidates where appropriate
- ensuring at least one member of any interview panel has completed safer recruitment training
- asking safeguarding-related questions at interview
- obtaining and scrutinising appropriate references
- making all offers conditional on satisfactory pre-employment checks
- completing identity, right to work, DBS, barred list, prohibition, section 128, childcare disqualification, qualification, overseas, reference, employment history and medical fitness checks where required
- recording required checks on the Single Central Record
- Providing appropriate safeguarding induction before or at the start of engagement

The Trust will not normally allow an individual to start work until all required pre-employment checks have been completed and recorded. In exceptional circumstances, where a DBS certificate has not yet been received, the individual may only start work where a formal risk assessment has been completed and authorised in accordance with the Recruitment and Selection Policy.

The Trust requires an overseas criminal record check, certificate of good conduct or equivalent check where an applicant has lived or worked overseas for more than three months since the age of 18, where such a check can reasonably be obtained. Where an overseas check cannot be obtained, a formal risk

assessment must be completed and approved before appointment is confirmed or before the individual starts work.

Volunteers will be assessed in accordance with the Recruitment and Selection Policy. From 1 September 2026, volunteers undertaking relevant activity with children will be treated as being in regulated activity where the activity is carried out on more than three days in a 30-day period, or overnight at any time, regardless of whether they are supervised. Volunteers engaging in regulated activity must have an enhanced DBS check with children's barred list information.

Agency, supply and third-party staff must only be engaged in accordance with Trust staffing, finance, procurement and safer recruitment procedures. Before an agency or supply worker begins, the Trust or academy must obtain written confirmation that the required checks have been completed and must verify the individual's identity on arrival.

Trustees, Members and Local Governors will be subject to the checks required by statutory guidance and Trust procedures. The Chair of the Trust Board must complete the Department for Education academy trust chair suitability check, which is carried out on behalf of the Secretary of State for Education.

Each academy, nursery, SCITT and the central team must maintain an accurate and up-to-date Single Central Record. The SCR will be subject to quality assurance checks at least half termly by the Central Team, and Local Governing Bodies, normally through the respective Safeguarding Link Governor/Trustee, should undertake an SCR assurance review at least termly.

Any concerns arising during recruitment, selection, pre-employment checking or ongoing employment must be escalated promptly in accordance with the Recruitment and Selection Policy, the Safeguarding and Child Protection Policy and, where relevant, the Allegations Against Staff Policy.

For full details of the Trust's safer recruitment procedures, pre-employment checks, volunteer arrangements, agency staffing requirements, Single Central Record guidance and related risk assessments, staff must refer to the Recruitment and Selection Policy 2026–2029

Appendix 5: Local Safeguarding Partner Procedures and Escalation Policy

If a child is in immediate danger of harm call the police on 999.

Local Safeguarding Children Partnership protocols and guidance can be found using these links:

Hampshire safeguarding children Partnership protocols and guidance

For children living in the Hampshire Local Authority area, professionals should complete the online Inter-Agency Referral Form for all social care referrals, information shares/requests and updates. The Hampshire and Isle of Wight Safeguarding Children Partnerships and Children's Trust Thresholds Chart can help you to identify the risks and types of services a family may need.

For urgent child protection enquiries, professionals can telephone: **01329 225379.**

LADO

If you have a concern about a member of staff working with children (in either a paid or voluntary capacity), contact the Local Authority Designated Officer (LADO). For information please refer to the Hampshire County website pages via www.hants.gov.uk and type in LADO, then select the 'allegations against people in a position of trust' option. This will take you to the initial enquiry or referral form. These forms are prioritised.

For further guidance and the role of the LADO, please see Hampshire County Council's guide on Allegations against people in a position of trust and the Allegations Against Staff or Volunteers HIPS Procedure.

Portsmouth safeguarding children Partnership protocols and guidance

The Multi-Agency Safeguarding Hub (MASH) is the front door to Children's Social Care for all child protection and immediate safeguarding concerns. If there is an immediate safeguarding concern where a child is deemed at risk or has potentially suffered significant harm, the MASH team should be contacted **immediately**.

- **During office hours** (9.00am – 5.00pm) call Portsmouth Multi-Agency Safeguarding Hub (MASH) on 0845 671 0271 or 023 9268 8793
- **Out of office hours** (evenings, weekends and bank holidays) call the Duty Team on 0300 555 1373

LADO

If you have a concern about a member of staff working with children (in either a paid or voluntary capacity) please contact the Local Authority Designated Officer (LADO) on 023 9288 2500 or email LADO@portsmouthcc.gov.uk

Portsmouth's LADO can be contacted by completing a LADO notification form and emailing it to LADO@portsmouthcc.gov.uk

West Sussex safeguarding children partnership Keeping children safe - West Sussex County Council

Safeguarding is the protection of a person's health, wellbeing and rights. The Integrated Front Door (IFD) for West Sussex Children Services receive safeguarding enquiries and referrals for children's social care and early help services, including those with disabilities.

Office hours (Monday to Friday, 9.00am to 5.00pm)

If you are unsure what support you require or have an urgent safeguarding concern that requires a same day response, phone: 01403 229900.

Out of hours enquiries (weekends and bank holidays)

Contact our Emergency Duty Team on 033 022 26664.

LADO

Report any such concerns using the LADO referral form on the West Sussex Safeguarding Children Partnership (WSSCP) website.

Appendix 6: Specific Safeguarding Issues

This appendix is based on Keeping Children Safe in Education (KCSIE) 2026 and should be read alongside Part One of KCSIE, which all staff are required to read and understand.

The safeguarding issues included within this appendix reflect the risks identified within statutory guidance and those relevant to the Trust's academies and local communities. The list is not exhaustive, and staff should maintain an attitude of 'it could happen here' and exercise professional curiosity where there are concerns about a child's welfare.

The Trust recognises that safeguarding issues are rarely experienced in isolation and that children may be vulnerable to multiple forms of abuse, harm, exploitation or neglect at the same time. Staff should consider the wider context of concerns and work closely with the Designated Safeguarding Lead (DSL) where risks are identified.

This appendix should be read alongside local safeguarding partnership procedures and any locally agreed protocols issued by Hampshire, Portsmouth and West Sussex safeguarding partners. The Trust will review this appendix annually and whenever significant changes are made to statutory safeguarding guidance or local safeguarding arrangements.

Assessing Adult-involved Nude and Semi-nude Sharing Incidents

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

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

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

- **Sexually Motivated Incidents**

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

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

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

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

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

- **Financially Motivated Incidents**

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

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

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

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

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

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

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

- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are Absent from Education

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

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

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

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

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

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

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

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

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an

immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child Criminal Exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

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

Child Sexual Exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

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

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

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

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

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

Child-on-child Abuse (including Harassment and Violence)

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

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

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- 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
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- 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/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 10 of this policy, as appropriate.

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

Domestic Abuse

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

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

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

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

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. Academies will participate in Operation Encompass or equivalent local arrangements where these operate within their local authority area. Operation Encompass

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

Homelessness

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

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

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

So-called 'Honour-based' Abuse (including FGM and Forced Marriage)

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

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

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

FGM

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

Section 10.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced Marriage

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

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer

- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing Radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**

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

- **Terrorism** is an action that:

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

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves

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

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

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

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

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

Harmful Sexual Behaviour, Sexual Violence and Sexual Harassment between Children in Schools

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

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

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a

single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)

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

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

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

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

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

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

When supporting victims, staff will:

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

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

Staff should be aware of the importance of:

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

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 10 of this policy, as appropriate.

Serious Violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation
- Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:
- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

- Being male
- Having been frequently absent 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 previously perpetrated violence

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

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

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

Checking the Identity and Suitability of Visitors

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

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

Visitors are expected to sign in and wear a visitor's badge.

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

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

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

Non-Collection of Children

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

- Attempt to contact the parent/carer using all available contact numbers.
- If contact cannot be made, attempt to contact other authorised emergency contacts provided by the parent/carers
- Ensure the child remains supervised by an appropriate member of staff in a safe and secure environment until they are collected
- Record all actions taken, including attempts to contact parents/carers and emergency contacts.
- If the child has not been collected within a reasonable period and no contact can be made with a parent/carer or authorised adult, the Designated Safeguarding Lead (DSL) or a senior leader will be informed and a risk assessment undertaken

- Where concerns exist for the child's welfare, or no responsible adult can be contacted, Children's Social Care and/or the Police may be contacted for advice and support
- The child will only be released to a person authorised by the parent/carer unless instructed otherwise by Children's Social Care or the Police.
- A written record of the incident, actions taken and outcome will be maintained in accordance with safeguarding and record-keeping procedures.

Missing Pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Remain calm and act immediately.
- Carry out a thorough search of the academy site, including classrooms, toilets, outdoor areas and any other locations where the child may reasonably be.
- Inform the Headteacher, DSL or a member of the senior leadership team immediately.
- Check attendance records, visitor logs and any other relevant information to establish the child's last known location.
- Deploy appropriate staff to undertake a coordinated search whilst ensuring remaining pupils continue to be supervised safely.
- Contact the child's parent/carer to establish whether the child may have been collected or left the site with permission.
- Where the child cannot be located within a reasonable period of time, or there is reason to believe the child may be at risk of harm, contact the Police immediately and follow any advice provided
- Notify Children's Social Care where appropriate and in accordance with local safeguarding procedures.
- Continue to liaise with the Police, Children's Social Care, parents/carers and other agencies until the child is located.
- Once the child is found, undertake appropriate enquiries to establish the circumstances surrounding the incident and identify any safeguarding concerns or support needs.
- Record all actions taken, decisions made and outcomes in accordance with academy safeguarding and record-keeping procedures.
- Review the incident to identify any lessons learned and amend risk assessments, procedures or support plans where necessary.