EPWORTH
EDUCATION TRUST

SUMMERSEAT METHODIST PRIMARY SCHOOL
BELIEVE • ACHIEVE • SHINE

"I have come so that they may have life and have it to the full." John 10:10

Child Protection and Safeguarding Policy

Autumn 2026

Reviewed by:	A Burkes, Trust Safeguarding Lead
Personalised for school by:	Sarah Brown (HOS)
Approved by Education & Ethos Committee:	
Approved by LAB:	
Next Review Date:	Autumn 2027

Summerseat Methodist Vision & Values

At Summerseat Methodist Primary, our vision, ethos and values are at the core of everything we do. They underpin our teaching and learning, and provide an environment which prepares our children to become lifelong learners; creating a safe and inclusive learning environment that nurtures individuality and enhances potential.

"I have come so that they may have life
and have it to the full."
John 10:10

As a church school, we have identified and uphold the following core Christian values that help us achieve our ethos and vision: joy, teamwork, love, respect, care, trust, forgiveness and equality.

Safeguarding Statement

At the Epworth Education Trust we recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We work to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. The procedures contained in the Safeguarding Policy apply to all staff, volunteers and governors.

Version Control

Change Record

Date	Author	Version	Section	Reason for Change
Sept 2022	Amy Burkes	1		Trust Policy created
24.7.2023	Amy Burkes	2		Updated in line with KCSIE 2023
08.08.24	Amy Burkes	3		Updated in line with KCSIE 2024 and Working Together to Safeguard Children 2023. Updated wording throughout policy to replace the phrase 'abuse and neglect' to 'abuse, neglect and exploitation.'
			p.3	Include SENDCo's name
			p.6	Updated 'definition' in line with KCSIE 2024 Update legal framework
			p.7	Role of LAB – link to unexplained or persistent absence
			p.12	DSL – good understanding of behaviours which impact engagement and learning and harmful behaviours.
			p.14	Keeping records of concerns, discussions and decisions made, including rationale for these decisions.
			p.15	Updated definition for 'abuse.'
			p.17	Updated Early Help section – in line with guidance from Working Together to Safeguard Children 2023.
			p.17 & 18	Added definition for 'Exploitation'
			p.20	'Children who are lesbian, gay, bisexual or gender questioning' *UNDER REVIEW*
			p.26	Alternative Provision – school continue to be responsible for safeguarding pupil
			P.27	New – Low Level Concerns section
			p.30	Glossary definitions updated – different types of exploitation, Kinship care, abuse, Terrorism
			p.36 – 41	Update 'Prevent' section
			p.53	Update 'children and the court system'
			p.53	
14.8.25	Amy Burkes	4		Updated in line with KCSIE 2025 and Working Together to Safeguard Children 2023 and revised EYFS Statutory Framework 2025
			p.7	Updated legal framework
			p.8	Include reference to 3 safeguarding partners
			p.23	Added section in on AI, to reflect paragraph 143 of KCSIE and communicating concerns to parents
			p.29	Additional information added on requirements of schools who have pupils on roll who access alternative provision in line with KCSIE 25. Updated term to 'Autism' in line with change in SEND code of practice. Inserted reference to EYFS Statutory Framework Annex C Removed section on Home stay exchange visits as not relevant to Trust schools. P. 33 - added info on raising concerns around practice in EYFS setting and whistleblowing.
			p.30	Appendix E – EYFS Annex C inserted for Statutory Safeguarding for EYFS.
			p.33	
			P37	Appendix F – inserted KCSIE link to Shore Space online resource for teenagers worried about the sexual behaviour and link to DfE online safety school self-assessment tools and updated to include EYFS online safety considerations

10.8.26	Amy Burkes	5	Full document reviewed and updated due to significant government safeguarding policy changes.	Significant number of changes throughout the full document in line with KCSIE 2026 and 'Working together to safeguard children 2026' Added new sections; Section 3 – Equality Section Section 4 – all roles and responsibilities rewritten and updated in line with KCSIE 2026 Section 5 – added in receipt and review of safeguarding information from previous settings. Section 7 – Explains the new Family Help model. Section 13 – All groups updated in line with KCSIE. New sections introduced for: - Children who are absent from education - Young Carers - Pupils who are questioning their gender - Pupils requiring mental health support (more comprehensive than previously) Appendix E – updated to include September 2026 EYFS requirements relating to safer sleep, screen use and prohibited dog breeds Removed: (old section 19) work experience (secondary school focused) Removed: (old section 6) Information sharing. (Now combined with old section 21 Communication and confidentiality) New section found in Section 5.
4.9.26	Amy Burkes	5.1	Sections 3, 4, 8, 10, 23, 24, 25, 26 and Glossary	Updated following final KCSIE 2026 publication. Added references to prejudice-based harm, racism and faith-targeted abuse; strengthened inclusive safeguarding culture; updated sexual abuse and child-on-child abuse definitions; and incorporated EYFS volunteer DBS requirements.

Contents

Statement of intent

Acronyms

1. Definitions
2. Legal framework
3. Equality Statement
4. Roles and responsibilities
5. Communication and confidentiality
6. Operation Encompass
7. Family Help and Early Intervention
8. Abuse, neglect and exploitation
9. Specific safeguarding issues
10. Child-on-child abuse
11. Online safety and the use of mobile technology
12. Making or sharing of nudes and semi-nudes
13. Pupils potentially at greater risk of harm
14. Use of the school premises for non-school activities
15. Visitors to school
16. Alternative provision
17. Concerns about pupils
18. Managing referrals
19. Concerns about school safeguarding practices
20. Safeguarding concerns and allegations of abuse against staff
21. Concerns that do not meet the harm-threshold – Low Level Concerns (LLC)
22. Safer recruitment
23. Single central record (SCR)
24. Training
25. Monitoring and review
26. Glossary

Appendices

A. Specific safeguarding issues
B. Staff Disqualification Declaration
C. Safeguarding Reporting Process
D. Definitions and signs of child abuse. Guidance for professionals who work with children on how to recognise the signs of child abuse (NSPCC)
E. EYFS Framework Statutory Safeguarding Training Requirements
F. Contacts and Advice

Statement of intent

Summerseat Methodist is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

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

- Ensuring that members of the trustee board, the local advisory board, the headteacher and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, neglect and exploitation and know to refer concerns to the DSL.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the headteacher and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

Safeguarding contact details:

Trust Designated Leads: Amy Burkes and Julie Ann Hewitt
Trustee Designated Lead: Alison Mitchell
Nominated Designated Safeguarding Lead: Sarah Brown HOS
Deputy Designated Safeguarding Lead/s: Julie Whittaker EHT, Lucy Oakes AHT, Emily Cole SENDCo
Inclusion Manager / SENDCo: Sarah Brown HOS

Local Authority Designated Officer (LADO): Mark Gay and Matt Healey
LADO telephone number: 0161 253 6168
LADO out of normal office hours telephone number: 0161 253 5342
LADO Email: lado@bury.gov.uk
Channel helpline: 020 7340 7264

Acronyms

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

Acronym	Long form	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.

HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
HSB	Harmful Sexual Behaviour	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. Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked after child	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LLC	Low Level Concern	Concerns raised to the DSL that do not meet the LADO Threshold.
MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.

SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

1. Definitions

1.1. Safeguarding and promoting the welfare of children **as defined in Keeping Children Safe in Education means:**

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

2. Legal Framework

2.1. This policy has been developed in accordance with the principles established by

- The Children Act 1989 / 2004 (as amended).
- Education Act 2011
- Serious Crimes Act 2015
- Statutory guidance on FGM
- Domestic Abuse Act 2021
- Counterterrorism and Security Act 2015
- The Children and Social Work Act 2017.
- The Safeguarding Vulnerable Groups Act 2006

2.2. In addition to the revised documents:

- **Working Together to Safeguard Children (2026 updated)**
- **Keeping Children Safe in Education (September 2026)**
- **Early years foundation stage statutory framework (September 2026)**
- **Academy trusts: governance guidance**

2.3. changes to safeguarding requirements over time. This policy references these throughout where relevant:

- GDPR and the Data Protection Act 2018
- Domestic Abuse Guidance 2022
- Guidance for Safer Working Practice 2022
- Rehabilitation of Offenders Act 1974
- Statutory guidance on the Prevent Duty
- Information Sharing: Advice for Practitioners 2018.
- Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018.
- Part 3 of the schedule to The Education (independent School Standards) Regulations 2014
- The Human Rights Act 1998.
- The Equality Act 2010.
- The Public Sector Equality Duty (PSED)

- Operation Encompass statutory guidance
- ‘Information sharing advice for safeguarding practitioners’ DfE (May 2024).

2.4. The term ‘safeguarding children’ covers a range of measures including child protection procedures. It encompasses a preventative approach to keeping children safe that incorporates pupil health and safety; school behaviour and preventing bullying; supporting pupils with medical conditions; personal, health, social economic education; providing first aid and site security.

2.5. 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 for an area within the LA.
- The Chief Officer of Police for an area in the LA area.

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

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

2.8. This policy should be read in conjunction with LA’s Threshold of Need document and any other key documentation

2.9. The aim of this policy is to ensure:
- All of our children are safe and protected from harm
- Safeguarding procedures are in place to help children and young people to feel safe and learn to stay safe
- Adults in the education setting community are aware of the expected behaviours and the legal responsibilities in relation to safeguarding and child protection.
- All agencies are providing appropriate support to children and young people through adoption of the early help / family hub framework.

3. Equality statement

3.1. 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.

3.2. We give special consideration to children who:
- Have special educational needs and disabilities (SEND) or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- The trust recognises that racism, faith-targeted abuse and other forms of prejudice-based harm can significantly affect a child's welfare, wellbeing, mental health and

sense of safety. Such behaviour will always be challenged and may be managed as a safeguarding concern where appropriate.

- 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
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

4. Roles and responsibilities

4.1. Under the Education (Independent School Standards) Regulations 2014, the Epworth Education Trust (the proprietor) will ensure arrangements for safeguarding and promoting the health, safety and welfare of all its pupils – having regard to any guidance made for all its schools and settings.

4.2. Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and trustees, and those serving on committees or local committees and governance professionals across our trust and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

4.3. The trust and its schools 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, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our behaviour policy, pastoral support systems and planned programme of relationships, sex and health education (RSHE).

4.4. The trust is committed to creating and maintaining an inclusive, respectful and anti-discriminatory culture where all children feel safe, valued and able to belong. Leaders, staff, pupils and governors share responsibility for challenging discriminatory attitudes, language and behaviour and for promoting equality, dignity and respect as part of the school's safeguarding culture.

4.5. All staff have a responsibility to:

- Read and understand part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (KCSIE), and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have read and 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.
- 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 deputies, the behaviour policy, the online safety policy that includes the expectations, applicable roles and responsibilities in

relation to filtering and monitoring, and the safeguarding response to children who go missing from education / who are absent from education.

- Be aware of the Trust's Attendance Policy and the trust's unauthorised absence procedures and children missing education procedures.
- Know 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.
- Know the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- Know the process for community-based Family Help assessment.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Know 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.
- Recognise signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- Recognise that prejudice-based harm, including racism, faith-targeted abuse, antisemitism, Islamophobia and other forms of discriminatory behaviour, can have a significant impact on a child's welfare, wellbeing and safety. Staff must treat such incidents as safeguarding concerns where appropriate and report them in line with safeguarding procedures.
- Know 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
- Understand new and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.
- Understand the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- Recognise the fact that children can be at risk of harm inside and outside of their home, at school and online.
- Understand 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.
- Know that children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying.
- Recognise the potential vulnerabilities of children who are questioning their gender.
- Understand that a child and their family may be experiencing multiple needs at the same time.
- Know what to look for to identify children who need help or protection.
- Be aware of the school's systems which support safeguarding, including CPOMs and any policies, procedures, information and training provided upon induction.

- Undertake safeguarding training, including online safety and Prevent training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Read this policy in conjunction with KCSIE 2026 and Working Together to Safeguard Children 2026.

4.6. <u>Responding to concerns / disclosures of abuse</u>

4.7. Staff adhere to the following Dos and Don'ts when concerned about abuse or when responding to a disclosure of abuse.

4.8. DO:

- Create a safe environment by offering the child a private and safe place if possible.
- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show you are shocked or upset.
- Use the 'tell me', 'explain', 'describe' and/or mirroring strategy.
- Tell the child that you know how difficult it must have been to confide in you and 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.
- Tell only the Designated or Deputy Safeguarding Lead.
- Write up in detail as soon as possible on CPOMs using the child's own words where possible. Stick to the facts, and do not put your own judgement on it.

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.

4.9. DON'T:

- Take photographs of any injuries.
- Postpone or delay the opportunity for the pupil to talk.
- Take notes while the pupil is speaking or ask the pupil to write an account.
- Try to investigate the allegation yourself.
- Promise confidentiality, e.g. Say you will keep 'the secret'.
- Approach or inform the alleged abuser.

4.10. 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**. Anyone can make a referral. Tell the DSL as soon as possible if you make a referral directly.

4.11. Teachers, including the headteacher, have a responsibility to safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.

4.12. The Board of trustees has a duty to:

- Facilitate a trust-wide approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.

- Ensure that all staff who work directly with children read at least part 1 of Keeping Safe in Education (KCSIE) and those staff who do not work directly with children read part 1 of KCSIE.
- The Education and Ethos Committee evaluates and approves this policy at each review, ensuring it complies with the law, and hold the headteacher/head of school 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 each school's local multi-agency safeguarding arrangements.
- Appoint a Safeguarding Trustee to monitor the effectiveness of this policy in conjunction with the full governing board.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- Ensure that each school follows the Trust policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils.
- Ensure the trust/school has appropriate cyber security systems in place.
- Ensure that the trust/school has appropriate filtering and monitoring systems in place and review their effectiveness at least once every academic year.
- Make sure the Trust and schools' DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.

4.13. The Local Advisory Board has a duty to:

- Review the school-specific elements of the policy after the trust level policy has been reviewed and approved.
- Hold the headteacher/head of school to account for the implementation of the policy.
- Appoint a member of each local governing body to act as the governor responsible for safeguarding, to liaise with the school DSL on local safeguarding issues.
- Evaluate and approve recommendations/action plans identified through quality assurance activity that the DSL undertakes to review safeguarding practice through audits (including Trust and LA), and annual/termly governing reports to ensure that they have regular oversight and hold the Headteacher to account.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children 2026'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

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

- Ensure that staff (including temporary staff) and volunteers:
  - Are informed of the school 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.
- Communicate this policy to parents/carers when their child joins the school and via the school website.
- Ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensure the trust's 'Safeguarding Compliance Tracker' is reviewed regularly and kept up to date.
- Act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Make decisions regarding all low-level concerns, though they may wish to collaborate with the Trust DSL on this.
- **In EYFS**
- Ensure the relevant staffing ratios are met, where applicable.
- Make sure each child in the Early Years Foundation Stage is assigned a key person.
- Oversee the safe use of technology, and devices like mobile phones and cameras in the setting.
- Ensure that EYFS safeguarding requirements relating to safer sleep practices, appropriate screen use and the management of risks associated with dogs on site are implemented and reviewed where applicable to the provision.

4.15. The Designated Safeguarding Lead (DSL) has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems on school devices and school networks to keep pupils safe online - in line with DfE guidance: Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges – Guidance.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- Support the headteacher/head of school in completion of the trust's 'Safeguarding Compliance Tracker' and any audits.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. If the DSL (HOS) is not on site, a DDSL should be contacted as available. If the concern is raised outside of school hours or the school term, the DSL (HOS) should be contacted by phone in the first instance and then the DDSLs on the SLT. If all unavailable MASH should then be contacted.
- Schools will also ensure that robust contingency arrangements are in place to enable safeguarding concerns, referrals and decision-making to be managed without delay in the event of the DSL's unexpected absence due to illness, leave or other circumstances. Summerseat have 5 DDSLs who are contactable on site. All members of the SLT are DSLs.
- The DSL will arrange, alongside the school, adequate and appropriate cover for safeguarding responsibilities during activities outside normal school hours and during school holiday periods, where required.

- 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.
- Ensure that concerns relating to radicalisation, extremism or vulnerability to being drawn into terrorism are managed in accordance with the Prevent Duty and relevant local safeguarding procedures. Where a referral to Channel is being considered or has been made, the school will work collaboratively with relevant partners, including the police, and will share information lawfully, appropriately and proportionately to support assessment, intervention and safeguarding activity. Information sharing will be undertaken in line with statutory guidance, data protection legislation and the welfare and safeguarding of the child.
- Have a good understanding of the filtering and monitoring systems and processes in place at our school.
- Assist the headteacher/head of school to review and respond to low-level concerns that may arise regarding staff.
- Liaise with the headteacher/head of school to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues.
- 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.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Ensure that any child or pupil currently with a child protection plan who is absent in the educational setting without explanation for maximum of two days is referred to their key worker's Social Care Team.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days for an in-year transfer or within the first 5 days of the start of a new term, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the local advisory board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Ensure all staff receive up-to-date safeguarding training on at least an annual basis.
- Undergo DSL training and update this training at least every two years (including EYFS DSLs)

- Ensure all staff have appropriate access to CPOMs so all incidents can be recorded and staff are nominated to ensure each incident is monitored and any actions carried out.
- Obtain access to resources and attend any relevant or refresher training courses.
- Have a good understanding of harmful behaviours that may require risk management, safety planning and/or support in school, this includes those presented by children within the setting, their parents/carer or associated adults where necessary.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of concerns and referrals on CPOMs, and understand the purpose of this record-keeping.
- Providing, with the Headteacher, a termly report to the Local Advisory Board (LAB), detailing any changes to policy and procedures; training undertaken by the DSL, and by all staff and the LAB; number and type of incidents and cases, and a number of children on the child protection register (anonymised).

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

5. Communication and confidentiality

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

5.2. Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff/trust members and with external agencies on a need-to-know basis. As required, information will be shared with the 3 safeguarding partners (see section 2.5) and other agencies and practitioners to ensure effective safeguarding.

5.3. The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

5.4. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

5.5. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interest.

5.6. 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 years old, if the alleged perpetrator is under 10 years old, the starting principle of referring to the police remains.

5.7. 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

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

5.9. Where a child leaves the school, the DSL should ensure the child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share information with the new school in advance of a child leaving (once the placement has been finalised).

5.10. When safeguarding information is received from another education setting, the Designated Safeguarding Lead (DSL), or an appropriately trained deputy, will review the information promptly to ensure that any risks, vulnerabilities or support needs are identified at the earliest opportunity.

5.11. Where information received is incomplete, unclear or raises further questions, the DSL will seek clarification from the previous education setting and, where appropriate, other relevant agencies to ensure a full understanding of the child's circumstances.

5.12. The DSL will consider any safeguarding information received in the context of the child's current circumstances and assess whether it indicates any risk of harm to the child or to others. This will include consideration of any relevant historical safeguarding concerns, child protection plans, risk assessments, attendance concerns, behavioural incidents, child-on-child abuse concerns, and other relevant welfare information.

5.13. Where safeguarding information identifies a need for support, monitoring, risk management or intervention, the school will ensure that appropriate action is taken without delay. This may include the implementation of a support plan, safety plan, risk assessment, pastoral support package, additional monitoring arrangements, or referral to relevant services

5.14. The school recognises that effective review, interpretation and use of transferred safeguarding information is essential to ensuring continuity of support and protecting children from harm.

5.15. In line with KSCIE, it is recommended that education professionals read the DfE Data Protection guidance for schools (DfE, updated 2026). This guidance is aimed at school staff, governors and trustees and sets out how to: comply with data protection law; develop data policies; understand what staff and pupil data to keep; and prevent personal data breaches.

5.16. The governments 'Information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers DfE 2024.' outlines 'Seven golden rules' for safe information sharing (including personal data) (page 4 and 5), and will support staff who have to make decisions about sharing information. The rules are:

1. **All children have a right to be protected from abuse and neglect. Remember that the General Data Protection Regulation (GDPR) Data Protection Act 2018 and human rights law are not barriers** to justified information sharing but provide a

framework to ensure that personal information about living individuals is shared appropriately.

2. **Be open and honest with the individual** (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. **Seek advice from other practitioners** if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. **Share with informed consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk.
5. **Consider safety and well-being**: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. **Necessary, proportionate, relevant, adequate, accurate, timely and secure**: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. **Keep a record of your decision and the reasons for it** – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

5.17. All staff must be aware that they have a professional responsibility to share information in order to safeguard children and cannot assume that someone else will pass on the information.

5.18. The school will always undertake to share our intention to refer a child or young person to Social Care with their parent's / carers unless to do so could put the child or young person at greater risk of harm or impede a criminal investigation.

5.19. In line with Keeping Children Safe in Education, as well as keeping records of concerns, discussions and decisions, designated safeguarding leads will keep a record of the rationale for any decisions made. These recordings include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

6. Operation Encompass

6.1. As part of the school's commitment to keeping children safe, the school has signed up to implement the principles and aims of the Encompass model and will work in accordance with the statutory requirements and local procedures to support children affected by domestic abuse. The purpose of the Encompass model is to safeguard and support children and young people who have been involved in or are witness to a domestic abuse incident.

6.2. Domestic abuse impacts on children in a number of ways. Children are at increased risk of physical injury during an incident, either by accident or because they attempt to intervene. Even when not directly injured, children are greatly distressed by witnessing the physical and emotional distress of their parent. Encompass has been created to address this situation. In KCSIE the definition of 'abuse' clarifies that harm can include children witnessing the ill-treatment of others and that this is particularly relevant where children **see, hear or experience** domestic abuse and its effects.

6.3. Encompass is the implementation of key local partnership working between police and schools. The aim of sharing information with local schools is to allow key adults (DSLs)

the opportunity of engaging with the child and to provide access to support that allows them to remain in a safe but secure familiar environment.

6.4. Following the report of an incident of domestic abuse, by 9.00am on the next school day, the school's key adult will be informed that the child or young person has been involved in a domestic incident. This knowledge, given to schools through Operation Encompass, allows the provision of immediate early intervention through silent or overt support dependent upon the needs and wishes of the child. Information received through Operation Encompass will be shared with appropriate staff on a need-to-know basis to enable timely and effective support for the child.

6.5. The purpose and procedures of Operation encompass have been shared with all parents and governors and is detailed as part of this safeguarding policy and published on the school website.

7. Family Help and Early Intervention

7.1. The school recognises that all children and families may need help and support at some point in their lives. In line with Working Together to Safeguard Children, the school is committed to identifying emerging needs at the earliest opportunity and working with children, families and partner agencies to provide the right help, support and protection at the right time.

7.2. The school will consider whether a child and their family may benefit from support through universal services, community-based early help or Family Help, which provides coordinated support for children and families with multiple or emerging needs. Staff should be alert to children and families who may benefit from Family Help. This includes, but is not limited to, a child who:

- Is unborn where concerns exist
- is disabled
- has special educational needs and/or disabilities (whether or not they have an Education, Health and Care Plan)
- is a young carer
- is bereaved
- is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- is frequently missing or goes missing from home or care
- is at risk of modern slavery, human trafficking, sexual exploitation and/or criminal exploitation
- is at risk of being radicalised
- 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 themselves
- is suffering from mental ill health
- is showing early signs of abusive, violent and otherwise harmful behaviour
- experiences repeated removal from the classroom
- is on a part-time timetable
- is at risk of placement in alternative provision / a PRU
- has returned home to their family from care
- is a privately fostered child
- has a parent or carer in custody

- is missing education, or persistently absent from school, or not in receipt of fulltime education; or has experienced multiple suspensions and is at risk of, or has been permanently excluded

This list is not exhaustive, and staff should remain vigilant to any circumstances which may indicate that a child or family requires additional help or support

7.3. The school recognises that good attendance, participation in education and positive wellbeing are protective factors for children. Staff will be alert to concerns including poor attendance, children missing education, changing behaviour, mental health difficulties, indicators of abuse, neglect or exploitation, and any other factors that may suggest a child is experiencing harm or requires additional support.

7.4. Where a child and family would benefit from additional support, the school will work with the child, parents/carers and relevant agencies to identify strengths, needs and appropriate interventions. This may include contributing to or initiating a Family Help Assessment and Family Help Plan in accordance with local safeguarding partnership arrangements.

7.5. Where appropriate, the school will support children and families to identify and involve their wider family and support networks in safeguarding and family support arrangements. This may include participation in family group decision-making processes, where these are considered appropriate by the child, family and relevant safeguarding partners.

7.6. Family group decision-making provides an opportunity for children, parents, carers and wider family networks to contribute to identifying strengths, addressing concerns and developing plans that promote the child's safety, wellbeing and outcomes. The school will contribute relevant information, where appropriate and lawful, and will work collaboratively with the child, family and relevant agencies to support agreed plans.

7.7. The school will ensure that the child's voice, wishes and feelings remain central to any family group decision-making process and will consider whether any safeguarding concerns, including concerns about coercion, family dynamics or risk of harm, affect how the process should be supported.

7.8. The school will ensure that safeguarding and Family Help practice is inclusive, child-centred and non-discriminatory. Staff will recognise and challenge the impact of discrimination, bias and inequality and consider how these factors may affect children's experiences, engagement with services and outcomes.

7.9. Assessments should be child-centred, build upon family strengths and consider the needs of the whole family. The school's actions will be informed by the views, wishes and feelings of the child and, wherever possible, the child and family will be actively involved in decision-making and planning.

7.10. Family Help is a coordinated approach that brings together support from a range of agencies to improve outcomes for children and families. It may include universal and community-based services, targeted early help, and, where appropriate, support provided under Section 17 of the Children Act 1989 for children in need. A Lead Practitioner may coordinate support, facilitate multi-agency working and oversee a Family Help Plan to ensure that children and families receive the appropriate support at the right time. The school will contribute to multi-agency planning, review meetings and information sharing in accordance with local procedures and data protection requirements. Where concerns indicate that a child has suffered, or is likely to suffer, significant harm, safeguarding and child protection procedures under Section 47 of the Children Act 1989 will be followed.

7.11. The school recognises the importance of effective information sharing and collaborative working to safeguard and promote the welfare of children and will work in partnership with safeguarding partners, Children's Social Care, health services, the police and other relevant agencies to ensure children and families receive timely and appropriate support.

7.12. Our school will support all children and young people by:

- providing a safe, caring, inclusive and protective environment
- promoting positive and healthy relationships, wellbeing, resilience and healthy lifestyles through the curriculum
- encouraging children's confidence, self-esteem and ability to seek help when needed
- identifying emerging concerns and providing support at the earliest opportunity
- working collaboratively with parents, carers and partner agencies;
- making timely referrals where additional support or protection is required
- sharing information appropriately to safeguard children
- supporting children affected by safeguarding issues, including domestic abuse; and ensuring relevant safeguarding information is transferred securely and promptly when a child moves to another educational setting.

7.13. If, at any point during a Family Help or early intervention process, concerns escalate and there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral to Children's Social Care will be made immediately and child protection procedures followed.

7.14. If the school believes a child is in immediate danger or at risk of significant harm, staff will contact the police on 999 and/or Children's Social Care as appropriate. Where a situation requires police attention but is not an emergency, staff may contact the police on 101 and seek advice from Children's Social Care Referral Team on **0161 253 5678.**

7.15. Lack of parental consent must never prevent a referral where there are concerns that a child may be at risk of significant harm.

7.16. In all cases the school will have regard to Keeping Children Safe in Education, Working Together to Safeguard Children, local safeguarding partnership procedures, and all relevant statutory safeguarding guidance and legislation.

8. Abuse, neglect and exploitation

8.1. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family, institutional or community setting by those known to them or more rarely by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

8.2. 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.

8.3. 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.
- Verbal abuse such as criticism, belittling, or name-calling.

8.4. Sexual abuse involves forcing, causing or inciting a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. Children who are sexually abused are more likely to know their abuser than not. A child under the age of 13 can never legally consent to any form of sexual activity.

8.5. . The activities may involve:

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

8.6. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

8.8. 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 caregivers)
- Ensure access to appropriate medical care or treatment

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

8.9. Exploitation is when someone uses a child for financial gain, sexual gratification, labour or personal advantage. Using cruel and violent treatment to force a child to take part in criminal or sexual activities often leads to physical and emotional harm to the child, to the detriment of their physical and mental health, education, and moral or social development. "The exploitation of children can take a number of different forms and perpetrators may subject children and young people to multiple forms of abuse at the same time, such as criminal exploitation (including county lines) and sexual exploitation." (The Home Office, 2022).

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

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

9. Specific safeguarding issues

9.1. There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

9.2. Appendix A of this policy sets out details about wider specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

10. Child-on-child abuse

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

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

10.3. For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

10.5. Child-on-child abuse can be manifested in many different ways, it is likely to include, but not limited to:

- Bullying, including cyberbullying, prejudice-based bullying, discriminatory bullying, racism, faith-targeted abuse, antisemitism, Islamophobia and other discriminatory behaviours.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos

(including the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry.

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

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

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

11. Online safety and the use of mobile technology

11.1. We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, our trust/school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school a mobile phone-free environment by default.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy, Mobile Phones Policy and IT Acceptable Usage Agreement.

11.2. Our approach to online safety is based on addressing the **four key categories of risk**:

- **Content** - being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact -** being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct** - online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

11.3. As part of a broad and balanced curriculum, we will educate pupils about online safety as part of our curriculum. For example:

- Keeping personal information private

- How to recognise unacceptable behaviour online
- How to report an incident of cyberbullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim.

11.4. School will train staff (and as part of induction), on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once an academic year.

11.5. Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation

11.6. The school will ensure that suitable filtering and monitoring systems are in place on ICT equipment to limit children's exposure to the 4 key categories of risk (described above) and apply to any use of generative AI.

11.7. Artificial Intelligence (AI)

11.8. Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

11.9. The school recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

11.10. The school will treat any use of AI to access harmful content or bully pupils in line with this policy and our Anti-Bullying and Behaviour policies.

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

11.12. Communicating with parents

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

11.14. The school will educate parents/carers about online safety via our website; communications sent directly to them and on newsletters. We will also share clear procedures with them, so they know how to raise concerns about online safety.

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

11.16. Where appropriate, the school 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.

11.17. If the school 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.

11.18. In the case of allegations of abuse made against other children, the school 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.

11.19. 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).

11.20. <u>Reviewing online safety</u>

11.21. The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by the school's community.

11.22. The school will carry out an annual review of the effectiveness of its filtering and monitoring systems. This review will be led by the headteacher/head of school and will include the senior leadership team member responsible for filtering and monitoring, the Designated Safeguarding Lead (DSL), and IT support staff or service providers, as appropriate. The review will assess whether filtering and monitoring arrangements are operating effectively across all relevant internet-connected devices, systems and locations used by pupils and staff. The school will retain a record of the review and any associated checks, actions and improvements identified.

11.23. <u>Personal electronic devices</u>

11.24. The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the ICT Acceptable Usage Policy and Mobile Phone Policy.

11.25. The school will make sure the Mobile Phone Policy is implemented effectively and ensure all staff (including supply agency and volunteers) know personal devices are not allowed in school for their own use.

11.26. Staff will not take pictures or recordings of pupils on their personal phones or cameras.

11.27. Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography Policy. All photographs and videos of pupils will be taken on trust / school owned devices **only**. Use of personal devices for this purpose is not permitted.

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

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

11.30. <u>Upskirting</u>

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

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

12. Making or sharing of nudes and semi-nudes

12.1. All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately. The DSL will refer to DfE guidance: 'Sharing nudes and semi-nudes: how to respond to an incident (overview) (updated March 2024)'.

12.2. Staff must **not**:

- View, copy, print, share, store or save the imagery, or ask a pupil to share or download it. (Tell the DSL immediately if you have accidentally viewed an indecent image and seek support).
- 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.

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

- Whether there is an immediate risk to pupil(s).
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed).
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images 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 individuals.
- 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 services 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 making or 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/head of school and other members of staff as appropriate (e.g., Trust safeguarding team), may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded on CPOMs in line with the procedures set out in this policy.

12.4. 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.

12.5. Informing parent/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.

12.6. Referring to the police - If it is necessary to refer an incident to the police, this will be done by contacting 999 or 0161 872 5050 for a non-emergency.

12.7. Recording incidents - All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded on CPOMs.

13. Pupils potentially at greater risk of harm

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

13.2. <u>Pupils with a social worker</u>

13.3. Pupils may need social workers due to safeguarding or welfare needs. The school 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.

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

13.5. Where the school is 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.

13.6. Home-educated children

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

13.8. In accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, the school will make a return to the local authority when a pupil's name is deleted from the admission register.

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

13.10. Looked-after children (LAC) and previously looked after children (PLAC)

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

13.12. The school will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as appropriate staff have:

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

13.13. The DSL will be provided with the necessary details of pupils' social workers and the virtual school head.

13.14. The school has appointed a designated teacher, Sarah Brown, 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.

13.15. 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 and 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 for LAC children, meet the needs identified in their personal education plans (PEPs)).

13.16. Children who are absent from education

13.17. The school recognises that good attendance is essential to safeguarding and promoting the welfare of children. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

13.18. All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. 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.

13.19. There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk of becoming missing from education. 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
- Cease to attend school
- Come from new migrant families

13.20. Children living in temporary accommodation may experience increased vulnerability due to disruption, instability and barriers to accessing education and support services. Where the school is notified that a child has been placed in temporary accommodation, the Designated Safeguarding Lead (DSL) will assess whether any additional safeguarding, welfare, attendance, pastoral or educational support is required and will work with relevant agencies and services to help ensure the child's needs are identified and addressed appropriately.

13.21. Attendance concerns will always be considered through a safeguarding lens. School will follow the Attendance Policy's 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.

13.22. The school will monitor attendance closely, identify emerging patterns of absence, and take prompt action where concerns arise. Particular consideration will be given to vulnerable pupils, including children in need, those subject to child protection plans, children with a social worker, and looked after children, as absence from education may increase existing safeguarding risks.

13.23. Every effort will be made to identify, locate, and support children to ensure they remain safe and have access to a suitable full-time education.

13.24. In accordance with the Department for Education's 'Working Together to Improve School Attendance,' the school will work collaboratively with parents/carers, the local authority, and other relevant agencies to improve attendance and address barriers to education. Where absence may indicate a safeguarding concern, appropriate referrals and information sharing will take place in line with statutory guidance and local procedures.

13.25. The school will inform 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.

13.26. The school will fulfil its statutory duties in relation to Children Missing Education (CME), including notifying the local authority when required and supporting reasonable enquiries to establish the whereabouts of children who are missing education.

13.27. In our EYFS setting: 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/carers and alternative emergency contacts.

13.28. The school 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.

13.29. 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 police welfare check requested.

13.30. 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 and FGM.

13.31. 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.

13.32. <u>Pupils with SEND</u>

13.33. The school recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. 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:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability.
- Pupils with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse.
- The need for intimate care or that these children are isolated from others.
- That these children are more likely to be dependent on adults for care.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so.

The school offers extra pastoral support to these pupils. This includes a team approach with mutiple staff working alongside pupils sharing concerns and observations, daily check ins and extra parent meetings.

13.34. When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENDCO / Inclusion Manager, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively and ensure any appropriate support for communication is in place.

13.35. <u>Pupils with medical conditions</u>

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

13.37. 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.

13.38. Young Carers

13.39. The trust recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

13.40. Pupils who are Lesbian, gay or bisexual

13.41. The trust recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. (See the school's Anti-bullying policy for more details of how we prevent bullying based on sexuality).

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

13.43. Any concerns should be reported to the DSL.

13.44. Pupils who are questioning their gender

13.45. Supporting pupils who are questioning their gender - The school 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.

13.46. The school will take a strong, proactive stance on all forms of bullying based on gender. (See our Behaviour and Anti-bullying policies for more details).

13.47. 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.

13.48. Involving parents/carers in cases of pupils questioning their gender - where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

13.49. 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.

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

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

13.52. 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).

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

- The trust has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes.
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes.
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition.

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

13.55. 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.

13.56. Rules on single-sex spaces - Pupils are not allowed into toilets, changing rooms, showers or rooms designated for the opposite biological sex, with no exceptions (including residential trips). Where appropriate, the school may consider alternative facilities, such as a self-contained individual toilet or changing facility, provided this does not compromise single-sex provision or the safety, dignity, privacy and welfare of the child.

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

13.58. 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.

13.59. Pupils requiring mental health support

13.60. 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).

13.61. 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
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

13.62. If a member of staff has a mental health concern about a child that is also a safeguarding concern, take immediate action by speaking to the DSL and member of SLT. If it is deemed the 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.

13.63. 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.

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

13.65. All staff have a role in:

- Promoting positive mental health and wellbeing and helping to prevent mental health difficulties
- Identifying pupils who may be experiencing mental health difficulties or who may be at risk.
- ensuring early and targeted support is provided, and
- Referring concerns to the DSL and liaising with specialist services where appropriate.
- Adhering to the school's Social, Emotional and Mental Health (SEMH) Policy.

13.66. The school will work with relevant local services, including Mental Health Support Teams (MHSTs) and other appropriate agencies, to ensure pupils receive timely and effective support, and staff are expected to follow safeguarding procedures where mental health concerns may indicate a safeguarding risk.

13.67. More information can be found in the Department for Education guidance on mental health and behaviour in schools.

14. Use of the school premises for non-school activities

14.1. The Local Advisory Board, along with the school's senior leadership team, are responsible for satisfying themselves and obtaining written assurances from any relevant school lettings and alternative/off site providers and provisions that their safeguarding arrangements are secure, in keeping with the requirements set out in KCSIE.

14.2. Where the governing board hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe.

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

14.4. The Trust must always be consulted with when a school is considering letting out their facilities.

14.5. If school receive an allegation relating to an incident during the letting period, school will follow their safeguarding policies and procedures as standard, including informing the LADO.

14.6. **Extracurricular activities and clubs**

14.7. External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

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

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

15. Visitors to school

15.1. 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.

15.2. 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.

15.3. All visitors to school sign in / out of school using the school's visitor management system and wear a school ID badge. A coloured lanyard will indicate whether the visitor is DBS checked or not to indicate whether they should be accompanied. A red lanyard indicates that a visitor is always to be accompanied. Visitors are provided with safeguarding information including the contact details of safeguarding DSLs.

15.4. Visitors of a professional role are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at the education setting. Supporting Letters in relation to DBS checks of visitors holding professional ID badges should be provided from the organisation sending the professional, such as the local authority or educational psychology service.

15.5. Community users organising activities for children are aware of the school's child protection guidelines and procedures.

15.6. The school 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.

16. Alternative provision

16.1. The school will remain responsible for the welfare and safeguarding of a pupil during their time at an alternative provider and should be satisfied that the placement meets the pupil's needs**.** When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff working at the provision. This includes getting written confirmation from the alternative provider that they will inform the school of any staff changes and that suitable checks have been made on them thus ensuring that the provision has effective

safeguarding policy/procedures/training in place for all staff. The provision follows safer recruitment processes and has clear allegation management processes. The school will also undertake appropriate quality assurance of the placement and be satisfied that the provider can meet the pupil's educational, welfare and safeguarding needs.

16.2. If a child is placed with an alternative education provider, then the school must know where the child who is placed with them is during school hours. The school must keep records of all locations that the alternative education provider uses. Prior to placement, the school will obtain details of the provider's Designated Safeguarding Lead (DSL) and establish clear arrangements for the sharing of safeguarding, welfare, behaviour and attendance information. Any safeguarding concerns relating to a pupil will be communicated promptly between the provider and the school's DSL.

16.3. Alternative provisions must be reviewed at least half termly to ensure the setting meets the child's needs and that the child is attending regularly. When safeguarding concerns arise the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed. Unexplained absence, poor attendance or failure to engage with the placement will be considered potential safeguarding concerns and followed up promptly in accordance with the school's safeguarding and attendance procedures. *(Paragraph 211 of KCSIE 2026)*

16.4. Pupils who attend alternative provisions can often have complex needs and it is important that the school is aware of the additional risks of harm that the pupil may be vulnerable to. Therefore, appropriate risk assessments/support plans and communication channels are in place where a pupil accesses provision offsite. The school will maintain responsibility for safeguarding records relating to the pupil and ensure that relevant information received from the alternative provider is recorded and acted upon appropriately.

17. Concerns about pupils

17.1. If a member of staff has any concern about a pupil's welfare, or a pupil has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSLs.

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

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

17.4. Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSLs with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.

17.5. If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

17.6. If early help/ family 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 the assessment process, in some cases acting as the lead practitioner.

17.7. The school will work in partnership with local safeguarding arrangements and follow locally agreed thresholds and processes for assessment, intervention and referral

17.8. 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. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely on CPOMS.

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

17.10. 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.

17.11. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

18. Managing referrals

18.1. The reporting and referral process outlined in the Reporting Safeguarding Concerns Process Flowchart will be followed accordingly.

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

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

18.4. Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

18.5. The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

18.6. At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of

harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

19. Concerns about school safeguarding practices

19.1. If a staff member has concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher/head of school as soon as possible. If the concern is with regards to the headteacher/head of school, it will be referred to the Chair of Governors and Trust Safeguarding Lead.

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

19.3. 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.

19.4. In EYFS settings, if a staff member has concerns about poor or unsafe practice in the setting's safeguarding provision this should be raised with the headteacher/head of school.

19.5. Where appropriate, if the allegation relates to EYFS staff, the school will inform Ofsted of the allegations and actions taken, within the necessary timescale (14 days).

19.6. Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should contact the Trust Safeguarding Lead or Hub Leader. They can also access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

20. Safeguarding concerns and allegations of abuse against staff

20.1. All allegations against staff, supply staff, trainee teachers, volunteers and contractors will be managed in line with the Trust's Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

20.2. If in doubt as to whether a concern meets the harm threshold, the headteacher / head of school will consult the local authority designated officer (LADO).

20.3. When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.

- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

21. Concerns that do not meet the harm-threshold – Low Level Concerns (LLC)

21.1. The school and Trust have established relevant processes and procedures for addressing concerns that do not meet the threshold for referral to the Local Authority Designated Officer (LADO). These concerns are classified as low-level concerns. The term "low-level" does not diminish the seriousness of such concerns; rather, it indicates that they fall below the LADO threshold but still warrant careful consideration through a safeguarding lens and appropriate action via the school's internal procedures. It is crucial to manage these concerns rigorously, as a pattern of repeated low-level concerns, although individually not meeting the LADO threshold, may collectively raise questions about an individual's suitability and potential risk to children within their professional capacity.

21.2. The school recognises that safeguarding responsibilities apply equally to individuals employed directly by the school and those working in or providing services to the school through third-party organisations, including agency staff, contractors, external providers and trainee teachers. Allegations and safeguarding concerns relating to these individuals will be managed in accordance with the Trust's Allegations of Abuse Against Staff Policy, Keeping Children Safe in Education, and local authority procedures.

21.3. At Summerseat the leadership manages low-level concerns (LLC) in accordance with the school's internal procedures. If it has verified that a member of staff has breached the Staff code of conduct, depending on the severity and impact on a child, the school will also engage with the Trust's Human Resources (HR) team to:

- Ensure staff understand what constitutes appropriate behaviour and can distinguish between expected and inappropriate behaviour in themselves and others.
- Empower staff to report any low-level safeguarding concerns.
- Address unprofessional behaviour promptly, providing support to correct it at an early stage.
- Offer a responsive, sensitive, and proportionate response to such concerns when they are raised.
- Identify any weaknesses within the school's safeguarding system.

21.4. The school's approach to managing low-level concerns reflects and extends the guidance provided in the staff code of conduct and the Allegations of Abuse Against Staff Policy.

21.5. Concerns may arise from various sources, such as suspicions, complaints, safeguarding concerns, allegations from other staff members, disclosures made by a child, parent, or external party, or pre-employment vetting checks. All staff should be aware that, in line with the school's culture, they are encouraged to trust and have confidence in the leadership when expressing concerns about adults working or volunteering with children.

21.6. The school handles information responsibly, sharing it on a need-to-know basis, and adheres to protocols for recording and storing information confidentially. The school fosters an open and transparent culture to identify concerning, problematic, or inappropriate behaviour early, thereby minimising the risk of abuse. It also ensures that all adults working in or on behalf of the school clearly understand professional boundaries and act in accordance with the ethos and values of the school and the Trust.

21.7. The principles and practices for managing low-level concerns follow the protocol outlined in the Allegations of Abuse Against Staff Policy. If there is uncertainty about whether a concern meets the threshold for LADO referral or qualifies as a low-level concern, the school should consult with the Trust HR team and the LADO.

22. Safer recruitment

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

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

- Teach, train, instruct, care for or supervise children on a frequent basis.
- Provide advice or guidance relating to a child's physical, emotional or educational wellbeing.
- Work regularly in a school or other specified establishment where they have the opportunity for contact with children.
- Provide personal care or healthcare to children.
- Undertake overnight activities involving children between 2am and 6am where there is opportunity for face-to-face contact with children.

From 1 September 2026, a volunteer who teaches, trains, instructs, cares for or supervises children on more than three days in a 30-day period, or who undertakes overnight activities involving children between 2am and 6am (e.g., residential visit), will be deemed to be undertaking regulated activity and will require an enhanced DBS check with children's barred list information, whether or not they are supervised by a member of staff.

22.3. The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

22.4. The school will inform shortlisted candidates that online searches will be done as part of pre-recruitment / due diligence checks. (KCSIE).

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

22.6. Where an individual is required to obtain an enhanced DBS certificate, the original certificate will be presented to and checked by the school before, or as soon as practicable after, appointment.

22.7. Where a DBS certificate has been obtained by another organisation, the school will only rely upon that certificate where permitted by Keeping Children Safe in Education and where the original certificate is presented and verified within 30 calendar days of its issue date.

22.8. Where the certificate is not presented within 30 calendar days of issue, or where there is any uncertainty regarding its validity, relevance or applicability to the role, the school will obtain a new DBS certificate and undertake any additional checks considered necessary.

22.9. A record of checks undertaken and decisions made will be maintained in accordance with statutory guidance and the school's single central record procedures.

22.10. The appropriate DBS and suitability checks will be carried out for all Trustees and Local Advisory Board members, volunteers, and contractors.

22.11. **Staff suitability**

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

- Have certain orders or other restrictions placed upon them.
- Have been convicted of, or cautioned for, certain specified offences.
- Meets any other disqualification criteria set out in the Childcare (Disqualification) Regulations and associated statutory guidance.

22.13. All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in relevant childcare settings/provision. Where an individual is disqualified, they must not continue to work in relevant childcare provision or in the management of that provision unless and until any disqualification is waived by Ofsted. The school will provide appropriate support and guidance regarding the waiver process where applicable.

22.14. **Ongoing suitability**

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

22.16. **Referral to the DBS**

22.17. The school will make a referral to the Disclosure and Barring Service (DBS) where it removes an individual from regulated activity, or would have removed the individual had they not resigned, retired or otherwise left their employment, because the individual has harmed a child or put a child at risk of harm; satisfied the harm test; received a caution for or been convicted of a relevant offence; or engaged in relevant conduct in relation to children.

22.18. This duty applies regardless of whether the individual has been dismissed, resigned, retired, redeployed to work that is not regulated activity, or otherwise ceased to undertake regulated activity with children.

22.19. The school will comply with its legal duty to make referrals to the DBS and, where appropriate, to the Teaching Regulation Agency (TRA), in accordance with Keeping Children Safe in Education and DBS guidance.

23. Single central record (SCR)

23.1. The school keeps an SCR which records all staff employed to work at the school, including agency and third-party supply staff, even if they work for one day and teacher trainees on salaried routes, who work at the school.

23.2. All members of the proprietor body (Trustee Board) are also recorded on the SCR.

23.3. The following information is recorded on the SCR:

- An identity check
- A standalone children's barred list check

- An enhanced DBS certificate, including children's barred list information where the individual is engaging in regulated activity
- A prohibition from teaching check
- Further checks on people who have lived or worked outside the UK
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- A section 128 check for those in management positions
- The date each check was completed

23.4. The school will only use agencies listed on the DFE Supply Framework.

23.5. For agency and third-party supply staff the school will also record whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff.

23.6. Volunteer who engages in regulated activity must be subject to an enhanced DBS check with children's barred list information. This information will also be recorded on the SCR.

23.7. Where the school is also subject to the Early Years Foundation Stage (EYFS) framework, volunteers must not begin working within EYFS provision until the school has received and verified the volunteer's enhanced DBS certificate, including children's barred list information, in accordance with Keeping Children Safe in Education 2026 and the EYFS Statutory Framework.

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

23.9. Where an individual no longer works at the school, their SCR record will be managed in accordance with Keeping Children Safe in Education, data protection legislation and the school's records retention arrangements.

24. Training

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

24.2. The induction training will cover:

- Read and understand part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (KCSIE).
- The Child Protection and Safeguarding Policy.
- Recognition of safeguarding indicators, including physical, emotional and sexual abuse, neglect, and exploitation.
- Whistleblowing procedures.
- Staff responsibilities relating to confidential reporting and information sharing.
- (For Early Years staff) Annex C of EYFS Statutory Framework.
- (For Early Years staff) Safer sleep guidance, screen considerations and statutory requirements relating to dogs on childcare premises.
- FGM and mandatory reporting duties.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.

- Attendance Policy and safeguarding links, including persistent absence.
- The Children Missing Education Policy, including the safeguarding response to children who go missing from education.
- The Positive Behaviour Policy.
- Appropriate child protection and safeguarding training, including online safety training.
- Information about the role and identity of the DSL and deputy DSLs.

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

- (For Early Years staff) Annex C of EYFS Statutory Framework.
- The issues surrounding harmful sexual behaviour (HSB), sexual harassment and sexual violence.
- Serious violence.
- Abuse, neglect and exploitation.
- Contextual safeguarding.
- Mental health and wellbeing concerns
- How to keep CLA and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training on emerging online risks (including key changes to KCSIE)

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

24.5. The DSL and deputy DSLs will undergo child protection and safeguarding training and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help, family help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- Multi-agency working and escalation procedures.
- How LAs conduct child protection case conferences and a child protection review conference, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.
- Filtering and monitoring requirements and online safety leadership.

24.6. Governors/trustees (including the safeguarding governor) will receive appropriate safeguarding and child protection training at induction and at regular intervals, thereafter, enabling them to provide strategic oversight of safeguarding arrangements and fulfil their statutory responsibilities.

25. Monitoring and review

25.1. The school's child protection policy and procedures will be monitored and updated by:

- Visits to the education setting by the Local Advisory Board (LAB) and the Trust.
- Senior Leadership Team (SLT) drop-ins and discussions with children, young people and staff.
- Pupil surveys and questionnaires.
- Scrutiny of exclusion and attendance data.
- Scrutiny of LAB minutes.
- Monitoring of bullying, racist and sexist incident logs by the SLT and LAB.
- Review of parental concerns and parent/carer questionnaires.
- Review of the use of intervention strategies, such as nurture provision.
- Trust safeguarding and CPOMS audits.
- Local Authority safeguarding audits (Section 148).

25.2. The Child Protection and Safeguarding Policy template is reviewed annually by the Trustees and once approved, is adopted by the school's Local Advisory Board. This policy will also be updated as required to ensure it remains current and reflects emerging and evolving safeguarding issues, including any lessons learned.

25.3. Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme and as part of safeguarding training and updates.

25.4. The next scheduled review date for this policy is autumn 2027.

26. Glossary

A Child	A person who has not yet reached their 18th birthday.
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those who know them or, more rarely by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. The definition of abuse has been expanded to highlight that witnessing ill-treatment of others is harmful to children in relation to domestic abuse ('including whether they **see, hear or experience** its effects').
Bullying & Cyberbullying	Behaviour that is: • repeated • intended to hurt someone either physically or emotionally • often aimed at certain groups, for example because of race, religion, gender or sexual orientation
Child Labour Exploitation	This involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential and dignity.
Child Protection	Activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Child sexual exploitation (CSE)	Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
Children with Special Educational Needs and/or disabilities	SEN – a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her. Disability – a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.
Child-on-child Abuse	Child-on-child abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in child-on-child abuse is under the age of 18.
County Lines	Criminal exploitation is also known as 'county lines' and is when gangs and organised crime networks exploit children to sell drugs. Often these children are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs
Contextual Safeguarding	Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.
Criminal Exploitation	Child criminal exploitation (CCE): Involves young people under the age of 18 in exploitative situations, relationships or contexts, where they may be manipulated or coerced into committing crime on behalf of an individual or gang in return for gifts, these may include: friendship or peer acceptance, but also cigarettes, drugs, alcohol or even food and accommodation.
Domestic Abuse	any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: • psychological • physical • sexual • financial • emotional
Early Help / Family Help	Early Help (now increasingly referred to as **Family Help** in Working Together to Safeguard Children 2026): Support provided when concerns first emerge about a child's wellbeing, development, or family circumstances. It aims to prevent problems from escalating by identifying needs early and coordinating support for children and families through effective multi-agency working. The school will work with families and other agencies to ensure children receive the right help at the right time.
Elective Home Education (EHE)	When a parent exercise their right to provide their child's education via an alternative to school. This involves the parent working in

	partnership with the local authority to support the authority meeting their duty to ensure the education is efficient and suitable. In this case the safeguarding duty for the child rests with the parent or guardian. Although safeguarding concerns from schools and professional would continue as with any other case and should follow safeguarding referral routes into the MAST for triage and assessment
Emotional Abuse	The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. 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. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Female Genital Mutilation (FGM)	Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.
Gangs & Youth Violence	Defining a gang is difficult. They tend to fall into three categories; peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public places to socialise, and although some peer group gatherings can lead to increased antisocial behaviour and low level youth offending, these activities should not be confused with the serious violence of a Street Gang. A Street Gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity. An organised criminal group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise).
Forced Marriage	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.
Hate	Hostility or prejudice based on one of the following things: • disability • race • religion

	• transgender identity • sexual orientation.
Homelessness	The definition of homelessness means not having a home. You are homeless if you have nowhere to stay and are living on the streets, but you can be homeless even if you have a roof over your head. You count as homeless if you are: • staying with friends or family; • staying in a hostel, night shelter or B&B; • squatting (because you have no legal right to stay); • at risk of violence or abuse in your home; • living in poor conditions that affect your health; • living apart from your family because you don't have a place to live together. https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities
Honour-based violence	Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.
Kinship Care	Kinship Care refers to a type of care where a child who cannot be looked after by their birth parents is cared for by relatives or friends. These arrangements can be known as either family and friends care or private fostering. - **Family and Friends Carers**: If you're a grandparent, aunt, uncle, brother, sister, or family friend looking after a child who can't be cared for by their birth parents, you're known as a family and friends carer. Sometimes these carers will be given Parental Responsibility for the children through a Child Arrangements or Special Guardianship Order. - **Private Fostering**: You're a private foster carer if you're not a close relative and you're looking after a child who's under 16 (or under 18 if they're disabled) for more than 28 days in a row.
Neglect	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: • Protect a child from physical and emotional harm or danger. • Ensure adequate supervision (including the use of inadequate caregivers). • Ensure access to appropriate medical care or treatment. • It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
Modern Slavery	Modern slavery is a serious crime being committed across the UK in which victims are exploited for someone else's gain. It can take many forms including trafficking of people, forced labour and servitude. Victims are often hidden away, may be unable to leave their situation, or may not come forward because of fear or shame.
Physical Abuse	A form of abuse which 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.
Private Fostering	A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.)
Radicalisation & Extremism	Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
Relationship Abuse	Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.
Safeguarding and promoting the welfare of children	• protecting children from maltreatment; • preventing impairment of children's health or development; • ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
Making or sharing of nudes or semi-nudes	Sharing nudes or semi nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.
Serious violence	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
Sexual Abuse	Involves forcing, causing 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. Children who are sexually abused are more likely to know their abuser than not. A child under the age of 13 can never legally consent to any form of sexual activity. 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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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
Harmful Sexual Behaviour	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 or 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.
Sexual harassment	Is a type of harassment involving the use of explicit or implicit sexual overtones, including the unwelcome or inappropriate promise of rewards in exchange for sexual favours. Sexual harassment includes a range of actions from verbal transgressions to sexual abuse or assault
Sexual Violence	Is the general term we use to describe any kind of unwanted sexual act or activity, including rape, assault by penetration, sexual assault, sexual abuse, and many others.
Terrorism	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 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.
Trafficking	Child trafficking: children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities.
Upskirting	Upskirting, typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

Appendix A - Specific safeguarding issues

Appendix A sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues. This appendix is based on the advice in Keeping Children Safe in Education (KCSIE 2026), in particular part 1.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on part 1 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

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 including physical, sexual, emotional abuse, and stalking) 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.

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

Police must notify a school/education setting of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

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

Homelessness

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

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

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

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

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. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

Children missing from education

A child going missing from school can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation. Staff will monitor pupils that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more. Staff report immediately to the DSL, if they know of any child who may be:

- Missing – whereabouts unknown and unable to make contact (as a result of making reasonable enquiries)
- Missing education – Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at school.

Admissions register

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

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

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

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

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

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

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

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

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

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

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives

- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admission register in the School Attendance (Pupil Registration) (England) Regulations 2024
- The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

The school will work proactively with the local authority and other relevant agencies to identify, locate and support children who may be missing education and to ensure that appropriate safeguarding action is taken where required.

Child abduction and community safety incidents

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

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

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

Child criminal exploitation (CCE)

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education

- Not taking part in education

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

County lines

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

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

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

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

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

Cyber-crime

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

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

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

Child sexual exploitation (CSE)

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. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

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

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

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

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

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

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 cyberbullying, prejudice-based bullying, discriminatory bullying, racism, faith-targeted abuse and other discriminatory behaviours.
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI
- Upskirting, which is a criminal offence, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in 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.

Modern slavery

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

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

FGM

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

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

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

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

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

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

Indicators that FGM may take place soon include:

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

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

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

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

Forced marriage

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Where an individual lacks the capacity to consent to marriage, coercion is not required for a marriage to be forced.

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

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

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

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

- Advice will be sought from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

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

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

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.

- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

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

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

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

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

Radicalisation

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

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

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

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

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

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

The Prevent duty

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

The school's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

Effective early help relies on all staff to be vigilant and aware of the nature of the risk for children and young people, and what support may be available. All front-line staff will undertake Prevent awareness training (every 3 years). DSLs and those with a responsibility for Prevent will ensure they attend Prevent training every two years, in particular focussing on local threat and risk and ideology training as outlined in the Prevent Duty Guidance.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in court

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

Pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Children and the court system: There are two separate age-appropriate guides (one for 5-11 year olds (HM Courts and Tribunals Service, 2017a) and the other one for 12-17 year olds HM Courts and Tribunals Service, 2017)) for schools to use to support children in the court system. (Annex B – Page 148).

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 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:

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

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

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

The DSL will:

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

Appendix B - Staff Disqualification Declaration

Name of school:	
Name of staff member:	Position:

Orders and other restrictions	Yes/No
Have any orders or other determinations related to childcare been made in respect of you?	
Have any orders or other determinations related to childcare been made in respect of a child in your care?	
Have any orders or other determinations been made which prevent you from being registered in relation to childcare, children's homes or fostering?	
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in Schedule 1 of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018?	
Are you barred from working with children by the DBS?	
Are you prohibited from teaching?	
Specified and statutory offences	
Have you ever been cautioned, reprimanded, given a warning for or convicted of:	
• Any offence against or involving a child?	
• Any violent or sexual offence against an adult?	
• Any offence under The Sexual Offences Act 2003?	
• Any other relevant offence?	
Have you ever been cautioned, reprimanded for or convicted of a similar offence in another country?	

Provision of information	
If you have answered yes to any of the questions above, provide details below. You may provide this information separately, but you must do so without delay.	
Details of the order restriction, conviction or caution:	
The date(s) of the above:	
The relevant court(s) or body/bodies):	
You should also provide a copy of the relevant order, caution, conviction, etc. In relation to cautions/convictions, a DBS Certificate may be provided.	

Declaration
In signing this form, I confirm that the information provided is true to the best of my knowledge and that: • I understand my responsibilities to safeguard children.

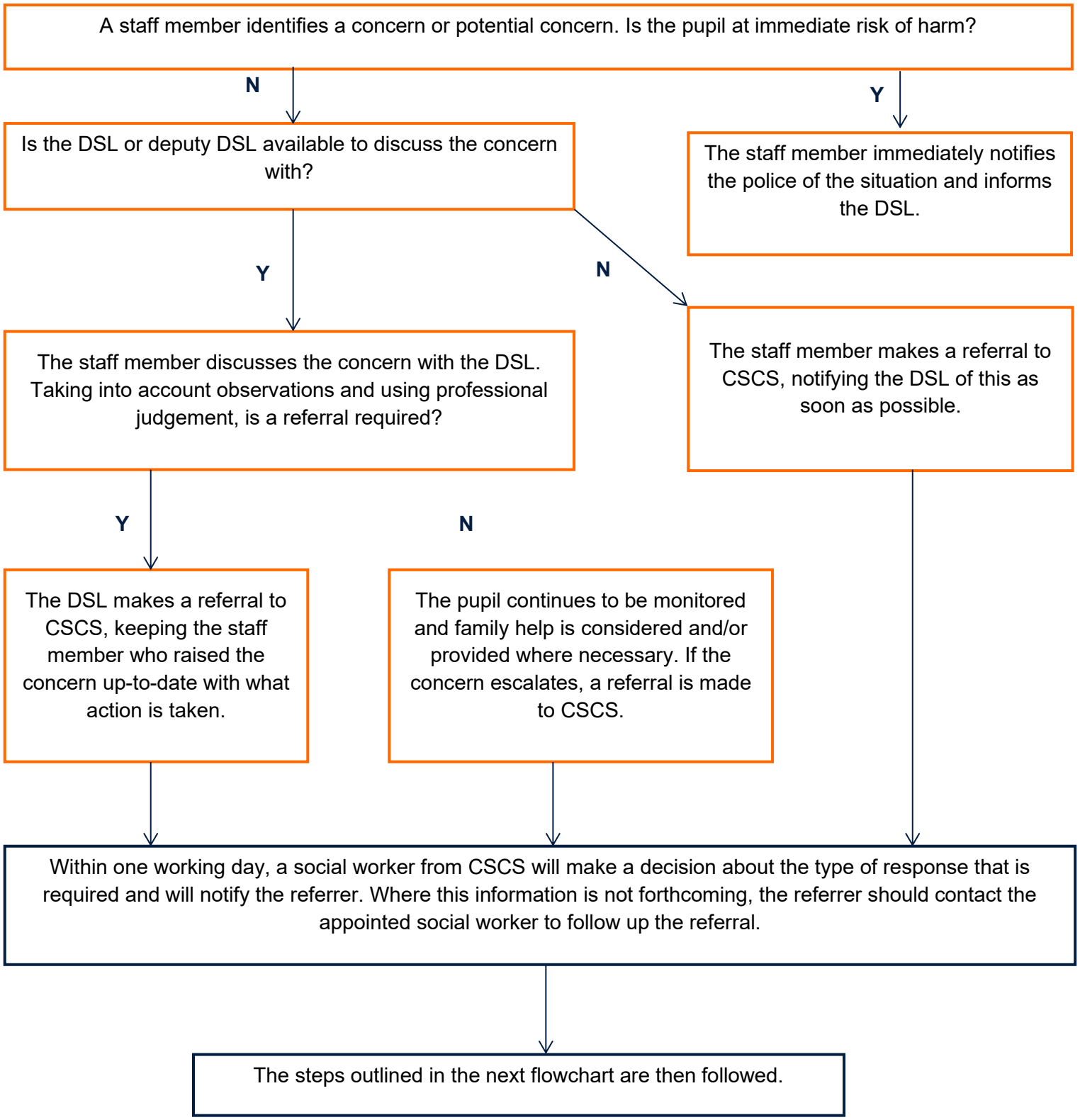
• I understand that I must notify my headteacher immediately of anything that affects my suitability to work within the school. This includes any cautions, warnings, convictions, orders or other determinations made in respect of me that would render me disqualified from working with children.	
Signed: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

Appendix C - Safeguarding Reporting Process

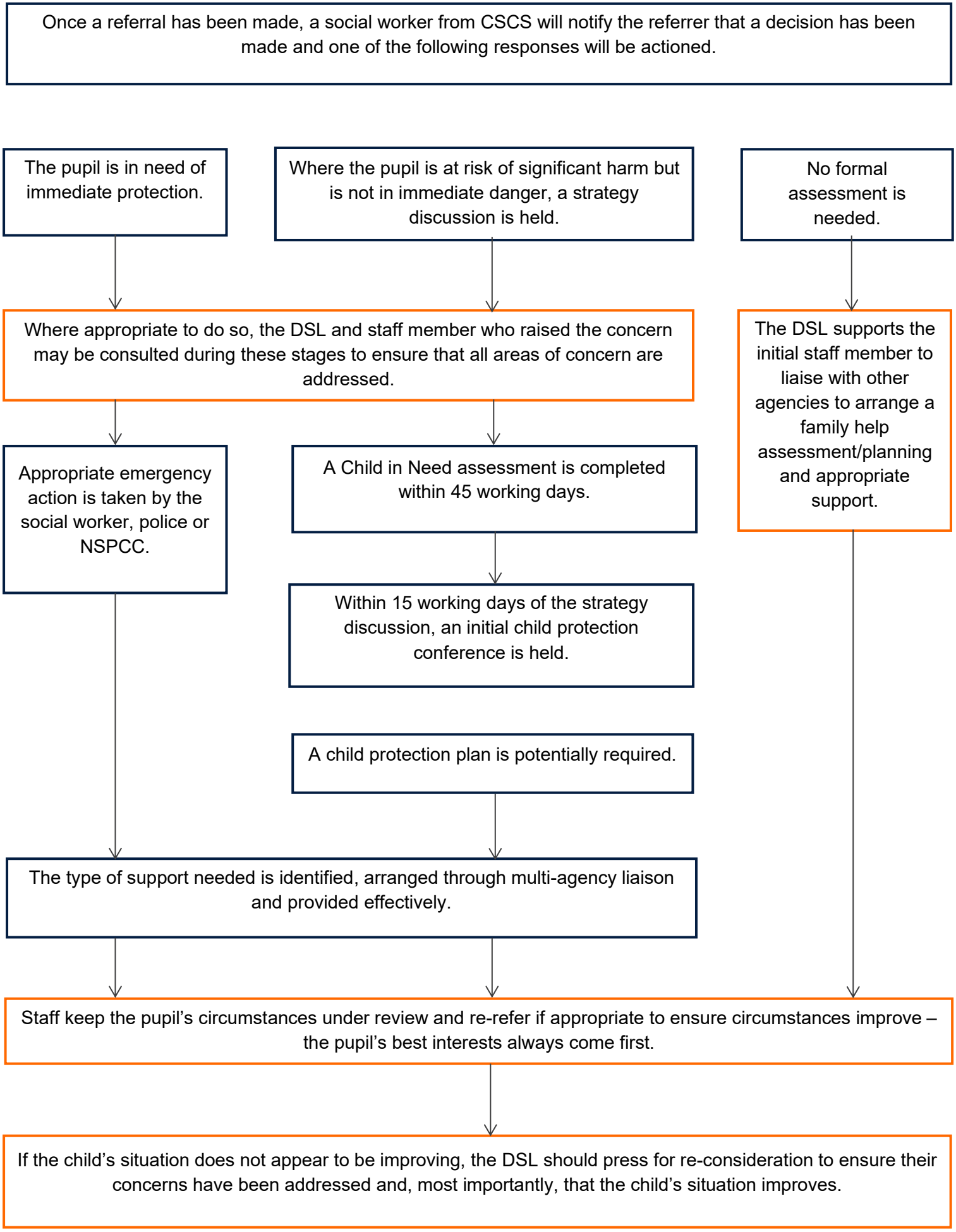
The process outlined within the first section should be followed where a staff member has a safeguarding concern about a child. Where a referral has been made, the process outlined in the 'After a referral is made' section should be followed.

The actions taken by the school are outlined in yellow, whereas actions taken by another agency are outlined in blue.

Before a referral is made



After a referral is made



Appendix D – Definition and signs of child abuse. Guidance for professionals who work with children on how to recognise the signs of child abuse (NSPCC)

https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf

Signs of child abuse and neglect

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities including non-contact activities, including online abuse.

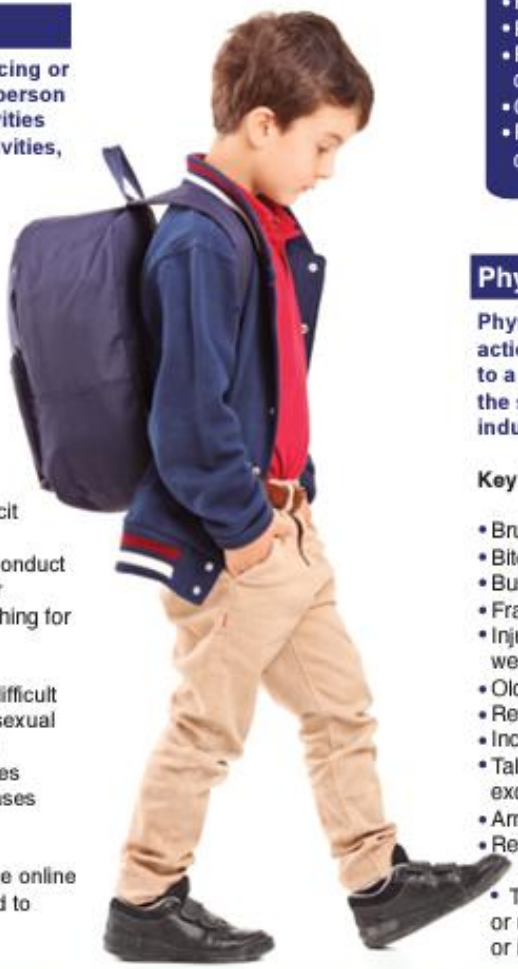
Key features

There may be few physical signs and more likely to be emotional and behavioural factors.

- Aggression
- Withdrawn
- Self harming, including eating disorders
- Drawings of sexually explicit behaviours
- Inappropriate sexualised conduct
- Sexually explicit behaviour
- Reluctance to remove clothing for swimming or PE

Sexual abuse can be very difficult to recognise and reporting sexual abuse can be an extremely traumatic experience. Studies indicate that over 90% of cases involve a known adult.

Sexual abuse can take place online and technology can be used to facilitate offline abuse.



High Risk Factors

- Families with complex needs
- Parental substance use
- Poor parental mental health
- Parents with learning difficulties
- Children with disabilities
- Families with past history of childhood abuse

Physical Abuse

Physical abuse involves any action that causes physical harm to a child including fabricating the symptoms of or deliberately inducing illnesses.

Key features

- Bruising of various ages
- Bite marks
- Burns and scalds
- Fractures in non- mobile children
- Injuries in unusual areas or with well-defined edges
- Old injuries or scars
- Refusal to discuss injuries
- Inconsistent explanations
- Talk of punishment which seems excessive
- Arms and legs kept covered
- Reluctance to remove clothing for swimming or PE
- The parents are uninterested or undisturbed by an accident or injury

Neglect

Neglect is the failure to meet a child's physical and or psychological needs.

Key features

- Persistently hungry
- Inadequate clothing for the child's size, weather or time of year
- Underweight for age
- Frequent school absences
- Poor health
- Emotionally needy

Further Information

The statutory guidance for schools is set out in the following documents:

Keeping Children Safe in Education (DfE)

Working Together to Safeguard Children (DfE)

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child.

Key features

- Development delay.
- Abnormal attachment to parent/ carer.
- Low self-esteem.
- Lack of confidence.
- Inappropriate emotional response.

Appendix E- EYFS Framework Statutory Safeguarding Training Requirements

Annex C: Criteria for effective safeguarding training

1. Training is designed for staff caring for 0-5 year olds and is appropriate to the age of the children being cared for.

2. The safeguarding training for all practitioners must cover the following areas:
   - What is meant by the term safeguarding.
   - The main categories of abuse, harm and neglect.
   - The factors, situation and actions that could lead or contribute to abuse, harm or neglect.
   - How to work in ways that safeguard children from abuse, harm and neglect.
   - How to identify signs of possible abuse, harm and neglect at the earliest opportunity. These may include:
     - Significant changes in children's behaviour.
     - A decline in children's general well-being.
     - Unexplained bruising, marks or signs of possible abuse or neglect.
     - Concerning comments or behaviour from children.
     - Inappropriate behaviour from practitioners, or any other person working with the children. This could include inappropriate sexual comments; excessive one-to-one attention beyond what is required through their role; or inappropriate sharing of images.
     - Any reasons to suspect neglect or abuse outside the setting, for example in the child's home or that a child may experience emotional abuse or physical abuse because of witnessing domestic abuse or coercive control or that a girl may have been subjected to (or is at risk of) female genital mutilation.
   - How to respond, record and effectively refer concerns or allegations related to safeguarding in a timely and appropriate way.
   - The setting's safeguarding policy and procedures.
   - Legislation, national policies, codes of conduct and professional practice in relation to safeguarding.
   - Roles and responsibilities of practitioners and other relevant professionals involved in safeguarding.

3. Training for the designated safeguarding lead (DSL) should take account of any advice from the local safeguarding partners or local authority on appropriate training courses. In addition to the areas set out in paragraph 2, training for the DSL must cover the elements listed below:
   - How to build a safe organisational culture.
   - How to ensure safe recruitment.
   - How to develop and implement safeguarding policies and procedures.
   - If applicable, how to support and work with other practitioners to safeguard children.
   - Local child protection procedures and how to liaise with local statutory children's services agencies and with the local safeguarding partners to safeguard children.

   - How to refer and escalate concerns (including as described at paragraph 3.9 of the EYFS).
   - How to manage and monitor allegations of abuse against other staff.
   - How to ensure internet safety.

4. The Department's early years safeguarding training package can be accessed via the following page: Early years foundation stage (EYFS) statutory framework - GOV.UK.

Additional September 2026 EYFS Safeguarding Requirements

In accordance with the Early Years Foundation Stage (EYFS) Statutory Framework (September 2026), the school will ensure that the following safeguarding requirements are considered and implemented where applicable to its EYFS provision.

Safer Sleep

Where babies and very young children sleep or rest as part of the EYFS provision, the school will promote safer sleep practices and ensure that staff receive appropriate information and training. Staff will:

- Follow the safer sleep requirements set out in the EYFS statutory framework and relevant current guidance.
- Ensure sleep arrangements are suitable for the age and developmental stage of the child.
- Conduct regular checks on sleeping children and maintain appropriate supervision.
- Work in partnership with parents and carers regarding children's sleep routines and individual needs.
- Record and respond to any concerns relating to a child's safety or wellbeing whilst sleeping.

Where children in the school's EYFS provision do not routinely sleep during the school day, the school will nevertheless ensure staff are aware of safer sleep principles and will apply them whenever sleep or rest arrangements are required.

Screen Use and Online Safety in Early Years

The school recognises that excessive, inappropriate or unsupervised screen use may impact on children's safety, wellbeing, learning and development.

In EYFS provision, staff will:

- Have regard to the Department for Education's *Screen use guidance for early years settings*.
- Have regard to children's age and stage of development when using screens and digital technology.
- Ensure that technology is used in a purposeful, developmentally appropriate and educational manner.
- Supervise children's use of digital devices and online content at all times.
- Promote a balance of active, social, physical and play-based learning experiences.
- Work in partnership with parents and carers to promote safe and appropriate use of technology both in school and at home.

Any online safety concerns identified within the EYFS will be addressed in accordance with this policy and the school's Online Safety Policy.

Banned Dog Breeds

The school will comply with statutory requirements relating to dangerous and prohibited dog breeds within registered childcare provision.

Where dogs are present on school premises, appropriate risk assessments and control measures will be implemented to safeguard children. Any decision to allow a dog on site will be subject to the school's health and safety, safeguarding and risk assessment procedures.

Appendix F

Contacts and Advice

Expert organisations

- Barnardo's
- Lucy Faithfull Foundation's HSB toolkit
- Shore Space online resource
- NSPCC - NSPCC whistleblowing advice line is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends. The email address is: help@nspcc.org.uk. Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH
- Rape Crisis
- University of Bedfordshire: Contextual Safeguarding
- UK Safer Internet Centre
- Policing.uk

Support for victims

- Anti-Bullying Alliance
- MoJ Victim Support
- Rape Crisis
- The Survivor's Trust
- Victim Support

Toolkits

- Brook
- NSPCC
- Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire

Guidance on Online Safety

- Plan technology for your school service, which schools can use to assess themselves against the filtering and monitoring standards and receive personalised recommendations on how to meet them. (https://www.gov.uk/guidance/plan-technology-for-your-school)
- DfE guidance on the use of generative AI in education (January 2026) at end of filtering and monitoring (FM) section to support schools and colleges. (https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations).

- 'Safeguarding children and protecting professionals in early years settings: online safety considerations'.

Further information on confidentiality and information sharing

- Gillick Competency Fraser Guidelines
- Government Information Sharing Advice
- Information Commissioner's Office: Education
- NSPCC: Things to Know and Consider

Further information on consensual and non-consensual sharing of images and videos

- UK Council for Child Internet Safety: Sexting Advice
- London Grid for Learning – Collection of Advice

Support for parents

- Parentzone
- Parentsafe – London Grid for Learning
- CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact
- CEOP Thinkuknow – Supporting Positive Sexual Behaviour