

Vanguard Learning Trust



As a group of local primary and secondary schools, Vanguard Learning Trust's mission is to serve its local community by providing outstanding, inclusive education. We have a collective purpose and responsibility to provide effective teaching, through a curriculum based on equality of opportunity and entitlement that allows our students to shine both in and out of the classroom. Each school in the Trust has its own ethos, which also complements the Trust's vision and values, and the common aspiration that all students can achieve their potential.

Safeguarding and child protection policy

Part A: Trust-wide

September 2025

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Part A: Trust-wide

1. Policy statement

1.1 Purpose

Vanguard Learning Trust is committed to safeguarding children and young people, and expects everyone who works for the Trust to share this commitment. Safeguarding and promoting the welfare of children are everyone's responsibility and applies to all employed staff, as well as contracted and supply staff working at any of the Trust's schools and/or central team. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action.

1.2 Definitions

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

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework ([click here](#)).

This definition is taken from the statutory guidance linked in section 1.4. It is important to remember that safeguarding and child protection are not the same. Safeguarding is what we do for all children and young people; a proactive endeavour to keep them safe whilst in our care. Child protection describes the interventions and procedures we will carry out for young people who are at risk of serious harm or have been seriously harmed. The term 'children' includes everyone under the age of 18.

1.3 Application

The Trust expects that everybody (trustees, governors and all staff, including contracted and supply staff) working in a Trust school, as well as the Trust central team, recognises and understands their safeguarding responsibilities. There is a shared commitment to providing a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of every child.

1.4 Statutory guidance

This policy is based on the statutory guidance provided in the Department for Education's '*Working together to safeguard children*' (updated 2023, [click here](#)) and '*Keeping children safe in education*' (known as *KCSIE*, updated September 2025, [click here](#)). There are four main elements:

- Prevention (eg. positive, supportive, safe school/learning provider culture, curriculum and pastoral opportunities for children/vulnerable learners, safer recruitment procedures).
- Protection (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns).
- Support (for all students, parents/carers and staff, and where appropriate specific intervention for those who may be at risk of harm).
- Working with parents/families and other agencies (to share information and ensure appropriate actions are undertaken).

1.5 Annual expectation

All members of the Trust are expected to read, at the start of each school year or at the time of appointment as part of their induction, the following documents:

- This Safeguarding Policy
- Part 1 of KCSIE (at a minimum)

- Staff code of conduct for the school they are employed in
- Behaviour policy for the school they are employed in
- Know the name and roles of the designated safeguarding lead (DSL) and their deputies for the school they are employed in
- Know how to raise a safeguarding concern with the DSL or other member of the school's wider safeguarding team
- Each school's DSL and members of the school's wider safeguarding team must have due regard to the guidance contained within other relevant safeguarding documentation, primarily '*Working together to safeguard children*' ([click here](#)) and the *London Safeguarding Children Partnership Threshold Document: Continuum of Help and Support* ([click here](#)).

2. Aims

2.1 Overview

The aims of this policy are to:

- establish a safe environment in which children can learn and develop;
- provide all members of the Trust with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children;
- ensure consistent good practice across the Trust; and
- demonstrate the Trust's commitment to safeguarding children.

2.2 Prevention of harm

The Trust recognises that its schools play a significant part in the prevention of harm by providing students with good lines of communication with trusted adults and an ethos of protection. Each school in the Trust will therefore:

- establish and maintain an ethos where students feel secure, are encouraged to talk and are always listened to;
- ensure that all students know there is an adult in the school whom they can approach if they are worried or in difficulty; and
- include in the curriculum opportunities that equip students with the skills they need to stay safe from harm and to know who they should turn to for help.

2.3 Working together to safeguard children

All schools within the Vanguard Learning Trust are committed to the expectations set out in '*Working together to safeguard children*'. These expectations are ensure that all practitioners:

- share the same goals to help keep children safe;
- learn with and from each other;
- have what is needed to help protect families;
- acknowledge and appreciate differences; and
- feel able to challenge each other where necessary.

3. Trust personnel

The chief executive officer is Dr Martina Lecky and the safeguarding-lead trustee is Mrs Pauline Nixon. The Trust safeguarding lead is Adam Walthaus. All Trust staff have all undergone the appropriate safeguarding checks, which are recorded on Trust's single central record (SCR); this is also linked to each school's SCR.

4. Equality statement

The Trust's equality policy ensures that the Trust promotes a fully inclusive environment where all members of the community are free from any form of discrimination which relates to its statutory safeguarding duties and that there is adherence to protected characteristics as outlined in the Equality Act 2021. This includes compliance with the Human Rights Act 1998 and Public Sector Equality Duty, paragraphs 83-93.

5. Contextual safeguarding

All Trust staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside of this environment. This is known as contextual safeguarding, which simply means that assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (and deputies) should consider the context within which such incidents and/or behaviours occur. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families (eg. sexual exploitation, criminal exploitation, serious youth violence). Children's social care assessments should consider such factors, so it is important that schools in the Trust provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

6. Roles and responsibilities

6.1 Designated safeguarding lead (DSL)

6.1.1 Overview

Each school in the Trust has a DSL, who is also a member of the school's senior leadership team. The DSL takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). All deputy DSLs are trained to the same standard as the DSL. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL for each individual school in the Trust. This responsibility should not be delegated. The DSL and any deputies should liaise with the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for the police area in the local authority area) and work with other agencies in line with *'Working together to safeguard children'*. During term time, the DSL and/or a member of the safeguarding team should be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. It is a matter for individual schools in the Trust to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

6.1.2 Responsibilities of the DSL

The DSL is expected to:

- keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program;
- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- make a Prevent referral where there is a radicalisation concern as required;
- support other staff who may make Prevent-related referrals;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service (DBS) as required;
- refer cases where a crime may have been committed to the police as required;
- liaise with the headteacher to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; this should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019;
- liaise, as required, with the local authority designated officer (LADO) in cases which concern a staff member;
- liaise with staff on matters of safety and safeguarding; and
- act as a source of support, advice and expertise for all staff.

DSLs should help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children (including those with a social worker) are experiencing, or have experienced, with teachers and other staff, for example:

- making sure that staff know who these children are, understand their academic progress and attainment, and maintain a culture of high aspirations for them;
- supporting teaching staff to identify the challenges that children in this group might face, and the additional academic support and adjustments that they could make to best support them.

6.1.3 Training

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via the Trust's Safeguarding Padlet, e-bulletins, meeting other DSLs or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

6.1.4 Raise awareness

The DSL should:

- ensure the Trust's safeguarding and child protection policy, including Parts A and B, is known, understood and used appropriately;
- ensure the Trust's safeguarding and child protection policy, including Parts A and B, is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- work with the school/Trust IT staff to ensure that filtering and monitoring systems are fit for purpose and that there is a clear procedure to respond to issues and safeguarding concerns, as well as fulfilling responsibilities under the Prevent duty. DSLs will ensure that all staff understand their responsibilities in this area, via information sharing during training and annual updates. The DSL will seek to ensure that cyber security is robust by completing regular checks and by utilising tools shared via the Trust's DSL online information-sharing platform;
- ensure that the school's attendance policy is clear about the safeguarding risks for children absent or missing from school, including those absent on repeat occasions/for prolonged periods. This should include how staff supporting attendance work with the DSL;
- periodically review procedures for responding to safeguarding concerns about other organisations and individuals using the school site and work with relevant staff to ensure that these are clearly stated in any lettings policy and hirings contracts;
- ensure the Trust's safeguarding and child protection policy, including Parts A and B, is available publicly and parents/carers are aware of the fact that referrals about suspected abuse, neglect and/or exploitation may be made and the role of the school in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

The full job descriptions of the DSL, deputies and staff who provide support are available in each school.

6.1.5 Working with parents/carers

The 2023 update to '*Working together to safeguard children*' guidance sets out four principles that professionals should follow when working with parents/carers. DSLs and wider safeguarding teams will hold these principles with due regard in their work:

- Effective partnership and the importance of building strong, positive, trusting and cooperative relationships.
- Respectful, non-blaming, clear and inclusive verbal and non-verbal communication that is adapted to the needs of parents/carers.
- Empowering parents/carers to participate in decision making by equipping them with information, keeping them updated and directing them to further resources.
- Involving parents/carers in the design of processes and services that affect them.

6.1.6 Supervision

The role of the DSL can be demanding, both professionally and emotionally. To support their wellbeing and maintain effective safeguarding leadership, the Trust is committed to providing regular, structured supervision to all DSLs. As outlined in the Trust's supervision protocol, each DSL is offered:

- a safeguarding supervision meeting every half-term, focusing on case reflection, building resilience and support with decision-making;
- a professional supervision meeting every half-term, centred around quality assurance of safeguarding and exploring opportunities for professional development;
- ad-hoc supervision, available at any time in response to complex or challenging safeguarding cases;
- group supervision, offered informally to members of each school's wider safeguarding team, enabling collaborative problem-solving and peer learning.

Supervision aims to promote reflective practice, reduce professional isolation and ensure DSLs are supported in delivering high-quality safeguarding provision across the Trust. Notes from supervision sessions will be stored securely and treated as confidential. However, in line with safeguarding best practice, any concerns raised during supervision that indicate a risk to the safety or wellbeing of staff or students will be shared with the school's headteacher and/or Trust CEO.

6.2 Headteachers

Each headteacher in the Trust is expected to:

- ensure that the Trust's safeguarding and child protection policy, including Parts A and B, and procedures are implemented and followed by all staff;
- allocate sufficient time and resources to enable the DSL and deputy to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings; and
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures;

6.3 Trustees and local governing bodies

All trustees and local governing bodies for each school will ensure that each school has:

- a DSL for safeguarding and child protection, who is a member of the senior leadership team and has undertaken the appropriate training (including online safety and an understanding of the school's filtering and monitoring system);
- a safeguarding and child protection policy and procedures that are consistent with Local Safeguarding Children Board requirements, reviewed annually and are available on the school's website;
- procedures for dealing with allegations of abuse made against members of staff including allegations made against the headteacher;
- safer recruitment procedures that include the requirement for appropriate checks in line with national guidance;
- a training strategy that ensures all staff, including the headteacher, receive child protection training, with refresher training at three-yearly intervals. The DSL should receive refresher training at two-yearly intervals;
- arrangements to ensure that all temporary staff and volunteers are made aware of the school's arrangements for child protection;
- a nominated member of the local governing body (LGB) (normally the chair) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the headteacher;
- appropriate safeguarding and child protection (including online) training in place for all governors and trustees at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and

colleges are effective and support the delivery of a robust whole-school approach to safeguarding. Their training should be regularly updated; and

- awareness of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements. This includes an understanding that their duty under the Equality Act includes reasonable adjustments for children with disabilities.

6.4 School staff in the Trust

All staff have a responsibility to provide a safe environment in which children can learn and all staff should be prepared to identify children who may benefit from early help. Early help means providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Any staff member who has a concern about a child's welfare should follow the referral processes set out in Part B of the Trust's safeguarding and child protection policy. Staff should expect to support social workers and other agencies following any referral. All staff should be aware of systems within their school that support safeguarding and these should be explained to them as part of staff induction. All staff should:

- receive appropriate safeguarding and child protection training (including around online safety and an understanding of the school's filtering and monitoring system) which is regularly updated;
- be aware of the school's culture of safeguarding and that there are responsibilities in and outside of school, as well as online and offline;
- know what to do if a child tells them he/she is, or might be being abused, neglected or exploited;
- know how to manage the requirement to maintain an appropriate level of confidentiality;
- never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child;
- refer all concerns/incidents reported to them to the DSL/member of the safeguarding team;
- be aware that safeguarding incidents could happen anywhere and be alert to possible concerns then being raised in school;
- raise concerns with children's social care directly if they believe there is a risk of immediate serious harm to the child. This would only be recommended if staff are unable to contact the safeguarding team directly, for example on return from a school trip in the early hours of the morning, or if they believe that the safeguarding team have not contacted social care following a disclosure/serious concern. Although both of these situations are highly unlikely it is important that staff remember that the safety of children is of paramount importance; and
- press for reconsideration if a child's situation does not appear to be improving following a referral.

Safeguarding concerns about adults in a school should be made directly to the headteacher of that school (as set out in section 15). Concerns about the headteacher should be made to the chair of the school's LGB. Concerns about safeguarding practices in a school should be made to a senior member of staff, to the Trust's CEO or by using the Trusts whistleblowing procedures outlined in Sections 15 and 16.

6.5 Contracted and supply staff working in a Trust school

All schools will ensure that any contracted and supply staff are made aware of the school's safeguarding systems and know what to do should they have a concern about a child or another member of staff or safeguarding practices at the school they are working in.

7. Staff and governor training

All staff in the Trust must undergo safeguarding and child protection training at induction. This formal training will be updated on an annual basis. In addition, all staff will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Trustees and local governing bodies will receive annual safeguarding training and additional sessions will be held on specific topics as required. This should be strategically planned so that all governors develop expertise

over time, enabling them to actively monitor and check on the effectiveness of safeguarding arrangements in their schools.

8. What staff should do if they have concerns about a child

Staff in the Trust are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. If staff have any concerns about a child's welfare, they should act on them immediately and follow their individual school's referral process. The DSL or a deputy should always be available to discuss safeguarding concerns during school hours. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. The Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. If a member of staff has any doubt about sharing information, they should speak to the DSL or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of any child attending a Vanguard Learning Trust school.

8.1 If a child discloses information to a member of staff

It takes a lot of courage for a child to disclose that they are being abused, neglected or exploited. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault. If a child talks to staff about any risks to their safety or wellbeing, the staff member will need to let them know that the information **must** be passed on; staff are not allowed to keep secrets. The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, such as out of school hours, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible. Part B outlines the school reporting systems and procedures and includes contact details.

8.2 During a conversation with the child:

There are important things that staff can say and do when a child discloses alleged abuse. This includes the following:

- Allow the child to speak freely.
- Do not promise confidentiality. If what a child discloses is an allegation of abuse, staff have a duty to tell and will then have to betray the child's trust. Always explain that the school will need to talk to a designated member of staff who will keep the issue as confidential as possible.
- Remain calm and do not overreact; the child may stop talking if they feel the information they are disclosing is upsetting to staff.
- Take what the child says seriously. Do not show disbelief and keep an open mind. It is more likely than not that the child is telling the truth.
- Give reassuring nods or words of comfort, eg. 'I'm so sorry this has happened' and 'You are doing the right thing in talking to me'.
- Do not be afraid of silences. Remember how hard this must be for the child.
- Listen, only asking questions when necessary to clarify. Under no circumstances ask investigative questions, such as how many times this has happened, whether it happens to siblings too, or what does the child's parent/carer think about all this.
- Do not criticise the alleged abuser. Often an abused child has very confused feelings about the perpetrator and may still like or love the person whilst hating what has been done. Judgemental comments can evoke a sense of bewildering loyalty.

- Give reassurance once the child has finished relating what has happened; this kind of thing has happened to others and there are people who can help and/or no-one has to go through this experience alone.
- Tell the child what will happen next as far as possible. Answer any questions honestly; if staff are unable to answer a question, they should say this and that they will try to find out.
- Never promise anything that cannot be delivered for certain. For example, do not promise that everything will work out fine or that the child will never have to face the abuser again. Staff can only promise to do their best to help.
- Write up the conversation as soon as possible and pass it on to the designated person without delay, as it may not be appropriate for the child to return home at the end of the school day.

8.3 Staff support

Staff should seek support from the DSL, their line manager or a senior member of staff if they feel distressed or upset.

9. Notifying parents/carers

Each school in the Trust will normally seek to discuss any concerns about a child with their parents/carers and this must be handled sensitively. However, if the individual school believes that notifying parents/carers could increase the risk to the child or exacerbate the problem, then advice will first be sought from children's social care and parents/carers may not be contacted.

10. 'Early help'

10.1 Overview

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child who:

- goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit;
- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- 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;
- has returned home to their family from care;
- is a privately fostered child.

Abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. All staff should be aware of indicators of abuse, neglect and exploitation (**Appendix 1**) so that they are able to identify cases of children who may be in need of help or protection. They should be mindful that 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, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Staff should also be cognisant of safeguarding issues (**Appendix 2**).

10.2 Considering family needs in the context of early help

In line with the guidance contained within the 2023 update to *‘Working together to safeguard children’*, assessments for early help should consider how the needs of different family members impact each other. This includes needs relating to education, mental and physical health, financial stability, housing, substance use and crime. Specific needs should be considered such as disabilities, those whose first language isn’t English, fathers or male carers and parents/carers who identify as LGBTQIA+. Early help services may focus on improving family functioning and developing the family’s capacity to establish positive routines and solve problems. Where family networks are supporting the child and parents, services may take an approach that enables family group decision making, such as family group conferences.

10.3 Taking action

Safeguarding professionals should work closely with education and childcare settings to share information, identify and understand risks of harm, and ensure children and families receive timely support. Key points to remember for taking action are as follows:

- to report concerns to the DSL or another member of the safeguarding team as quickly as possible, and certainly before the end of the school day;
- if a member of the safeguarding team is not available, ensure the information is shared with the most senior person in the school that day and ensure action is taken to report the concern to children’s social care;
- staff should not start their own investigation;
- to share information on a need-to-know basis only – not to discuss the issue with colleagues, friends or family;
- to complete a record of concern;
- staff should seek support if they are distressed; and
- in an emergency, take the action necessary to help the child; for example, call 999.

11. Statutory children’s social care assessments and services

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children’s social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process and the expectations set out in KCSIE. A children’s social care assessment should consider where children are being harmed in contexts outside the home, so it is important that Trust schools provide as much information as possible as part of the referral process so that all the available evidence is considered to enable a contextual approach to address such harm. This is outlined in section 17 and 47 of the Children Act 1989 ([click here](#)). All Trust schools should ensure they do all they can to support the assessment and, if the child’s situation does not appear to be improving, follow local escalation procedures.

12. Multi-agency working

Schools in the Trust have a pivotal role to play in multi-agency safeguarding arrangements. Local governing bodies should ensure that each school in the Trust contributes to multi-agency working in line with statutory guidance *‘Working together to safeguard children’*. Locally, the 3 safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for the police area in the local authority area) will make arrangements to work together to safeguard and promote the welfare of local children. Trust schools must ensure they have in place robust arrangements for multi-agency working, which is outlined in Part B of the policy.

13. Information sharing

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation. The Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote welfare and protect the safety of children. Each school in the Trust must ensure that when children leave, their child protection file is transferred to the new school or college as soon as

possible, ensuring secure transit, and confirmation of receipt. This should be transferred separately from the main student file. Receiving schools should ensure key staff such as the DSL and SENCO are aware as required. In addition to the child protection file, the DSL should also consider whether it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

14. Child leaving a Trust school

If a student leaves a Trust school, the school must ensure:

- where the name of the next school is known, the DSL will alert the headteacher and/or DSL ahead of the child's arrival about any safeguarding concerns; and
- their safeguarding file is sent securely to their receiving school once attendance has been confirmed.

If the next school is not known, the procedures for children missing from education (CME) must be followed and in the case of a child of any concern, children's services are alerted (see details in Part B for school procedures). Each Trust school is required to have these procedures documented in school policy. If the student is home-educated, their safeguarding file is archived.

15. Concerns about another member of staff supply/contracted staff or volunteer

15.1 Introduction

All schools in the Trust must have a policy and procedures, that align to those set out in KCSIE part 4, for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. This includes all members of staff, supply teachers, volunteers and contractors. This includes both:

- Allegations that may meet the harm threshold.
- Allegations/concerns that do not meet the harm threshold – referred to for the purposes of this guidance as 'low-level concerns'.
- Concerns that occur inside and outside of school, online as well as offline.

15.2 Allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour taking place both inside and outside of school.

If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers, contractors and supply teachers) posing a risk of harm to children, this should be referred to the individual school's headteacher. Headteachers, as 'case managers', will make a referral to the LADO within one working day of all allegations that come to an employer's attention or that are made directly to the police. The LADO can be contacted via the local authority website ([click here](#)). Headteachers are encouraged to contact the LADO for a consultation where there is uncertainty around whether an allegation meets the harm threshold. Where there are concerns/allegations about the headteacher, this should be referred to the individual school's chair of governors or the Trust's CEO, who will act as the 'case manager'. Employees can also contact the NSPCC whistleblowing advice line on 0800 028 0285.

Headteachers will deal with any allegations of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Procedures for dealing with allegations will be applied with common sense and judgement; an overview of these can be found in **Appendix 3**.

15.3 Concerns about agency and contracted staff

A school may have to consider an allegation against someone not directly employed by the school and where the usual disciplinary procedures don't fully apply, like supply staff provided by an agency. The school should not decide to stop using the supply teacher due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. The LGB should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while they carry out their investigation. Agencies should be fully involved and co-operate in any enquiries but the school will usually take the lead as the agency won't be able to collect the necessary information. When using an agency, they should be informed of the process for managing allegations, including inviting the agency's HR manager or equivalent to meetings and keeping them up to date with information about your policies. Allegations will be reported by the school to the LADO.

15.4 Low-level concerns

15.4.1 Overview

This applies to concerns which do not meet the harm threshold, referred to as 'low-level' concerns. The Trust actively promotes an open and transparent culture in which all concerns about all adults (members of staff, governors, supply teachers, volunteers and contractors) working in or on behalf of any Trust school are dealt with promptly and appropriately. This should enable early identification of inappropriate, problematic or concerning behaviour, minimise the risk of abuse and ensure that adults working in Trust schools are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the Trust. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating students.

Low-level concerns may arise in several ways and from a number of sources, for example a suspicion, a complaint, a disclosure made by a child, parent/carer or other adult within or outside of the organisation or as a result of vetting checks undertaken. Schools will keep a log of any low-level concerns raised.

15.4.2 Sharing low-level concerns

The Trust actively promotes across all schools the importance of sharing low-level concerns and a culture of openness, trust and transparency. Each school should make it clear what a low level concern is and set out within their staff code of conduct how the school's values and expected behaviour are lived, monitored and reinforced constantly by all staff. Each school will achieve the purpose of their low-level concerns policy and procedure by:

- ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns (see below)
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised, and
- helping identify any weakness in the school or college safeguarding system.

15.4.3 Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously; and/or
- to the individual involved and any witnesses.

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the Trust's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

15.4.4 Record-keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. Records will be:

- kept confidential, held securely and comply with the DPA 2018 and UK GDPR;
- regularly reviewed by the headteacher and DSL so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the headteacher will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in Section 15.2 of this appendix, the headteacher will refer it to the LADO; and
- retained at least until the individual leaves employment at the school/Trust.

Where a low-level concern relates to a supply teacher or contractor, the Trust will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

15.4.5 References

The Trust will not include low-level concerns in references unless:

- the concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated; and/or
- the concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

15.5 Staff who are the subject of an allegation

15.5.1 Overview

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, it is accepted that some adults do pose a serious risk to children's welfare and safety and in such cases all schools in the Trust must act on every allegation made. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

15.5.2 Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, headteachers will only suspend an individual if they have considered all other options available and there is no reasonable alternative. Based on an assessment of risk, headteachers will consider alternatives such as:

- redeploying within the school so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying the individual to alternative work in the school so that they do not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted; and/or

- temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Trust.

If in doubt, the case manager will seek views from the Trust's personnel adviser and the LADO, as well as the police and local authority children's social care where they have been involved.

15.6 Definitions for outcomes of allegation investigations

The LADO will review the information provided by the case manager and decide whether an allegation is:

- Substantiated: there is sufficient evidence to prove the allegation.
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation.
- False: there is sufficient evidence to disprove the allegation.
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

15.7 Non-recent allegations

When an adult makes an allegation to a Trust school that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will co-ordinate with local authority children social care and the police. Abuse can be reported no matter how long ago it happened. The chair of the trustees must be informed if such an allegation is made.

16. What staff should do if they have concerns about safeguarding practices

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team. Appropriate whistleblowing procedures should be put in place for each individual school as outlined in the Trust's Whistleblowing Policy. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance on whistleblowing can be found via the DfE's website 'Advice on Whistleblowing' ([click here](#)).
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 or email: help@nspcc.org.uk

17. Children at increased risk and/or are more vulnerable

17.1 Children missing from education (CME)

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation, particularly county lines. Schools recognise that their response to persistently absent students, and children missing education, supports identifying such abuse and in the case of absent students, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. The DfE's statutory guidance on school attendance '*Working together to improve school attendance*' ([click here](#)) sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns. Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can

be found in the DfE's statutory guidance 'Children Missing Education' ([click here](#)). Further information about how schools within Vanguard Learning Trust supports the attendance of vulnerable students can be found in the Trust's attendance policy, which is available on each school's website.

17.2 Children who are homeless

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) should be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the local housing authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

17.3 Looked after children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse, neglect and/or exploitation. The DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group. Each individual school in the Trust must appoint a designated teacher and should work with local authorities to promote the educational achievement of registered students who are looked after or previously looked after.

17.4 Children with special educational needs and disabilities

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

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

To address these additional challenges, schools in the Trust should consider extra pastoral support for children with SEN and disabilities.

17.5 Children involved in a child protection issue

Child abuse, neglect and exploitation can be devastating for the child and can also result in distress and anxiety for staff who become involved. All schools in the Trust will support the children, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person who will keep all parties informed and be the central point of contact. Where a member of staff is the subject of an allegation made by a child, a separate link person will be nominated to avoid any conflict of interest;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of help lines, counselling or other avenues of external support;
- following the procedures laid down in the whistle blowing, complaints and disciplinary procedures; and
- co-operating fully with relevant statutory agencies.

17.6 Children requiring mental health support

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. Each Trust school should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. The Trust expects each school to have a documented mental health strategy in place, that is shared with all staff. Each school should have appointed a named mental health lead(s) and ensure that they and other staff are appropriately trained for their roles in mental health issues and understand the school systems for raising concerns so help can be put in place. Schools are expected to raise awareness with students, so they understand the importance of mental health; this is typically planned within a school's personal, social, health and economic education curriculum. This helps to ensure that each child knows how to seek help, when needed. Details on the school's approach to mental health, together with sources of information and support, is available by contacting the school.

17.7 Children with health issues

Certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Trust schools should ensure that arrangements to care for children with specific health issues are appropriate and well managed, with clear recognition of the need for vigilance in relation to safeguarding of those children. Schools also recognise that the routine care and treatment of students who are unwell or injured during the school provide opportunities to be vigilant in relation to safeguarding. Each school should have in place a documented policy and practice to ensure staff are able to recognise and report concerns. School leaders should routinely look for patterns and trends in school records of the care and treatment of unwell or injured students, and take appropriate actions.

17.8 Children who may be lesbian, gay, bisexual, trans, queer or questioning, intersex or asexual (LGBTQIA+)

The fact that a child or a young person may be LGBTQIA+ is not in itself an inherent risk factor for harm. However, children who are LGBTQIA+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+. The Trust recognises that risks can be compounded where children who are LGBTQIA+ lack a trusted adult with whom they can be open. It is therefore vital that each school and its members of staff endeavour to reduce the additional barriers faced and provide a culture for them to speak out or share their concerns with members of staff. Staff will support children or young people who are LGBTQIA+ on a case-by-case basis, ensuring that the child's best interests are kept front and centre.

17.9 Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. National Information Centre on Children of Offenders (NICCO, [click here](#)) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

18. The use of reasonable force

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. The term 'reasonable force' covers a broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path or active physical contact such as leading a student by the arm out of the classroom. Should a member of staff be in a position where they use 'reasonable force' they must inform their school's DSL and provide a written report. All Trust schools must have in place a use of positive handling in their behaviour policies, ensure staff are trained in its use, and this is kept current.

19. Staff wellbeing

The Trust recognises that safeguarding is everyone's responsibility and that there is a duty of care to the professionals working in Trust schools. The Education Support Partnership is a charity providing mental health and well-being support services to all education staff and organisations. Education Support Partnership Helpline is open every day, 24 hours a day, and can be contacted by calling 0800 562 561. Staff can also text on 07909 341229 or email support@edsupport.org.uk

20. Safer recruitment

20.1 Introduction

All schools in the Trust should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. Each school in the Trust is responsible for the recruitment of their staff and must have written recruitment and selection policies and procedures in place. **Appendix 4** has a list of what to include in the recruitment policy. The School Staffing (England) Regulations 2009 require governing bodies of maintained schools to ensure that at least one of the persons who conducts an interview has completed safer recruitment training. The Trust expects all schools to comply with this.

20.2 The single central record (SCR)

All schools in the Trust must maintain their own SCR detailing checks carried out in each school. The SCR must cover the following people:

- all staff, including teacher trainees on salaried routes;
- agency and third party supply staff who work at the school;
- LGB members;
- Trustees and Trust staff;

The SCR must indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check;
- a barred list check;
- an enhanced DBS check/certificate;
- 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 establish the person's right to work in the United Kingdom.
- a section 128 check (for management positions for independent schools including academies and free schools).

20.3 Agency and third party (supply) staff

Trust schools must also include whether written confirmation has been received that the employment business supplying the member of agency or supply staff has carried out the relevant checks and obtained the appropriate certificates. This includes the date that confirmation was received and whether any enhanced DBS certificate check has been provided in respect of the member of staff. Confirmation of these checks should be noted on the SCR, together with details on their identity check on the first day of arrival in the school.

20.4 Trainee/student teachers

Where applicants for initial teacher training are salaried by the Trust, the individual school must ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including barred list information) must be obtained. Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. Schools in the Trust should obtain written confirmation from the provider that it has carried out all pre-appointment checks that the school would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children. There is no requirement

for the school to record details of fee-funded trainees on the SCR. However, the Trust advises schools to do so.

20.5 Volunteers

Any Trust school may decide to make use of volunteers. Under no circumstances should a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity, A school should undertake a written risk assessment for each volunteer and use their professional judgement and experience when deciding what checks, if any, are required. The school should obtain an enhanced DBS check (which should include children's barred list information) for all volunteers who are new to working in regulated activity with children. If at any time the school has any concerns about an existing volunteer, they should consider obtaining a new DBS check at the level appropriate to the volunteering role.

20.6 Contractors

If a Trust school uses contractors to provide services, they should set out their safeguarding requirements in the contract between the organisation and the school. The school should ensure that any contractor, or any employee of the contractor, who is to work at the school, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information). Under no circumstances should a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to children in a Trust school. The Trust places responsibility for determining the appropriate level of supervision depending on the circumstances of the individual school. If an individual working at a school or college is self-employed, the school or college should consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account The identity of contractors on their first arrival at the school must be checked and a formal record of the date of this check kept on the SCR, together with details of their DBS check, if they have one.

20.7 Governance

Each school in the Trust must obtain an enhanced DBS check for all members of the LGB and check that members are not disqualified from taking part in the management of the school because of a section 128 direction. Details of these checks must be recorded on the SCR. The same must be done for trustees and members and these details must be on the Trust's SCR.

20.8 Ongoing vigilance

If a school in the Trust has concerns about an existing staff member's suitability to work with children, the individual school should carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the Trust moves from a post that was not regulated activity into work which is considered to be regulated activity, the relevant checks for that regulated activity must be carried out.

20.9 Retention of documents

Trust schools do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the SCR. To comply with the requirements of the Data Protection Act 2018, Trust schools may retain a copy of the DBS but they should only do so if there is a valid reason and it should not be kept for longer than six months. Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.

21. Curriculum opportunities to teach safeguarding

All schools in the Trust must consider opportunities to teach safeguarding. In line with statutory requirements this must include:

- covering relevant issues through Relationships Education (RE) and Relationships and Sex Education (RSE)

- teaching online safety
- personal, social and health education
- spiritual, moral, cultural and special education

The Trust views these opportunities for students to learn how to keep themselves safe as essential. All schools in the Trust are required to:

- have in place an RE/RSE policy and set out the school's approach to its content, delivery and assessment;
- follow the DfE guidelines for teaching online safety in schools and set this out in relevant policies; and
- take account of the school's context to ensure that students are age-appropriately taught about potential risks, self-assessment of risk and how to mitigate risks.

In addition, within the context of each school, students will be provided with information to assist their transition into the next stage of their education.

22. Online safety

22.1 Introduction

The use of technology has become a significant component of many safeguarding issues. Technology often provides the platform that facilitates harm when it comes to child sexual exploitation, radicalisation and sexual predation. The breadth of issues classified within online safety is considerable but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories;
- **contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults;
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Online safety, including an understanding of the school's filtering and monitoring system, must be a running and interrelated theme of the whole-school approach to safeguarding and should be reflected as required in all relevant policies and across the curriculum.

22.2 Policy and practice

Each school in the Trust must have in place a policy for online safety. This must include details of:

- roles and responsibilities of leaders, staff, governors, students and parents/carers
- consider how each of the 4Cs are covered and approached across the school
- filtering and monitoring
- overblocking and how staff can request access to filtered website as part of their routine teaching
- teaching online safety
- staff and governor training in online safety
- information security and access management
- sources of support for staff and parents/carers on keeping children safe when online
- mobile phones and social media usage
- use of personal devices by staff
- use of student devices in school
- the annual review of online safety

22.3 Staff training

All staff and governors undertake annual update training in online safety to ensure they are fully conversant with the current risks posed by children when using online technologies. Topics could include: social media, searching the internet, texting, gaming, scams, grooming, use of images, online harmful sexual behaviours and reputational damage.

22.4 Safeguarding and the use of artificial intelligence (AI) and educational technology (EdTech)

The Trust recognises the growing presence of AI, machine learning tools and emerging EdTech in school settings. These innovations offer new learning opportunities but also pose emerging safeguarding risks including data privacy, inappropriate content generation, dependency on automated decisions and student exposure to unsupervised tools. To mitigate these risks:

- The Trust will seek to adopt national best practice guidance on AI and EdTech in safeguarding contexts, including those from the Department for Education, the UK Safer Internet Centre and the National Cyber Security Centre.
- The Trust's digital lead and safeguarding lead will work together to support the development of relevant policy and procedures relating to AI and digital safeguarding.
- Schools are expected to risk-assess all new digital tools and platforms, particularly those using AI functionality, prior to student use.

This area will be reviewed regularly to ensure that practice evolves alongside technological developments.

22.4 Filters and monitoring

22.4.1 Overview

Each school in the Trust should ensure that they have appropriate filters and monitoring systems in place. The appropriateness of any filters and monitoring systems are a matter for individual schools and are outlined in Part B of this policy. Filtering and monitoring is not solely the responsibility of the school's IT provider or server; the DSL will have a lead role in ensuring that filtering and monitoring systems are fit for purpose and will have a clear procedure to respond to issues and safeguarding concerns, as well as responsibilities under the PREVENT duty. DSLs will ensure that all staff understand their responsibilities in this area, via information sharing during training and annual updates. The DSL will ensure that cyber security is robust by completing an online review. The UK Safer Internet Centre has published guidance as to what 'appropriate' filtering and monitoring might look like ([click here](#)). Whilst filtering and monitoring is an important part of the online safety picture for schools and colleges to consider, it is only one part. Many children have unlimited and unrestricted access to the internet via their phone data; individual schools within the Trust are encouraged to consider how this is managed on their premises.

22.4.2 Information security

Schools are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the National Education Network. In addition, schools will take appropriate action to meet the cyber security standards for schools and colleges which were developed to help them improve their resilience against cyber-attacks. Broader guidance on cyber security, including considerations for governors and trustees, can be found on the National Cyber Security Centre website ([click here](#)).

23. Remote education

Each Trust school should have in place a policy for remote education, which includes the arrangements for the safeguarding of children while they are learning from home. Schools are likely to be in regular contact with parents/carers. Any communications should be used to reinforce the importance of children being safe online. Schools should:

- provide information to parents/carers to help them understand what systems the school has in place to filter and monitor online use; and
- inform parents/carers of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.

24. Alternative provision

Where a school places a student with an alternative provision provider, it continues to be responsible for the safeguarding of that student and should be satisfied that the placement meets the student's needs. As students who attend alternative provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their students may be vulnerable to. Schools will use the Trust's suitability check template, which forms the basis of a risk assessment. As part of this process, schools will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (ie. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (ie. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff. Schools should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. Schools should regularly review the alternative provision placements they make, using the Trust's alternative provision monitoring log template. Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

25. 'Safeguarding separation'

In exceptional circumstances, a decision may be taken to temporarily remove a student from the school community, either through a suspension or placement in alternative provision, for safeguarding purposes. This may be to protect the student (for example, from potential retaliation or peer pressure), to reduce the risk of further harm to others or to allow for a calm and safe investigation into a serious incident. Such decisions are made with the involvement of the school's designated safeguarding lead and must be proportionate, clearly documented and subject to review. Where a safeguarding separation is applied, schools must continue to fulfil their safeguarding and educational responsibilities, ensuring the student receives appropriate support, supervision and reintegration planning. The Trust will monitor the use of safeguarding separation to ensure it is used appropriately and equitably.

26. Elective home education

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carer has expressed their intention (in writing) to remove a child from school with a view to educating at home, Trust schools are expected to work with the LA and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.

27. Use of school premises

Where school facilities/premises are hired or rented out by organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) Trust schools should ensure that appropriate arrangements are in place to keep children safe. When services or activities are provided by the LGB, under the direct supervision or management of their school, the school arrangements for child protection will apply. However, where services or activities are provided separately by another body, the LGB should seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. This applies regardless of whether or not the children who attend any of these

services or activities are children on the school roll or attend college. Schools should include a statement of their approach to the use of their premises/facilities and safeguarding arrangements in Part B.

28. Children staying with host families

If a school in the Trust makes arrangements for their students to be provided with care and accommodation by a host family to whom they are not related, for example, as part of a foreign exchange visit or sports tour, they should consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay. See Annex E of 'KCSIE' for further details.

29. Care arrangements

29.1 Private fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children. The school should then notify the local authority to allow it to check the arrangement is suitable and safe for the child.

29.2 Informal care arrangements

Alongside children in formal, private fostering arrangements, schools within the Trust also recognise the safeguarding risks associated with children living in unregulated or informal care arrangements, such as being cared for by extended family members or close family friends. These arrangements, often referred to as kinship care, may not be formally registered or monitored and therefore present additional vulnerabilities. Each school will:

- remain alert to indicators that a child may be living away from their usual parental home without formal oversight;
- support families and carers by referring, where appropriate, to the local authority's kinship care team, which offers specialist guidance, support services, and oversight for informal carers;
- work collaboratively with local authority partners to ensure that children in informal care arrangements receive the pastoral, academic and safeguarding support they require; and
- ensure that staff are aware of the distinction between kinship care, private fostering and local authority looked-after status so that appropriate pathways of support are triggered.

Children in informal care arrangements will receive the same levels of safeguarding consideration and support as all other children in the Trust's care.

30. Safeguarding monitoring arrangements

The Trust's safeguarding lead will monitor the safeguarding arrangements in each school, through school reports and meetings and visits to school to meet with senior leaders, ascertain student and staff views and scrutinise school documentation. More information can be found in the Trust's Safeguarding Forum Handbook ([click here](#)). Both Parts A and B of this policy will be reviewed at least annually. The policy will be revised following any national or local policy updates, any local child protection concerns and/or any changes to our procedures. All Trust staff will be informed of any changes made. Each school should have proactive monitoring arrangements in place to ensure the effectiveness of the safeguarding systems. The DSL and headteacher will provide regular reporting on safeguarding activity and systems to the safeguarding lead, as well as their LGB and trustees. Reports will not include details of individual children's situations or identifying features of families as part of their oversight responsibility. Schools are expected to adopt the following approaches to the monitoring of safeguarding arrangements. This could include: meetings with the DSL, visits to school, ascertaining the views of staff, students and parents/carers through discussions and/or surveys, use of an audit tool, asking all governors to ask a safeguarding question during meetings with leaders/staff on other aspects of school life, termly checks of the SCR, review of school data and use of an external consultant.

Version history

First issue/revision date	Approved by	Summary of changes if not first issue
July 2025	BoT	<ul style="list-style-type: none"> ● Updated section 1.4: link to 2025 version of <i>'Keeping children safe in education'</i> ● New section 6.1.6: information about the Trust's supervision protocol ● Updated section 10.1: added definition of 'early help' ● Updated section 15.2: clarified that the headteacher is responsible for discussing cases with the LADO, added contact details ● Updated sections 15.4.3/4/5: clarity around low-level concerns following recent training ● Updated section 17.1: updated language in KCSIE around children missing education, with added emphasis on the statutory nature of <i>'Working together to improve school attendance'</i> ● Updated section 22.1: definition of online risks around content now includes 'misinformation, disinformation (including fake news) and conspiracy theories ● New section 22.4: additional information to highlight safeguarding considerations around artificial intelligence (AI) and educational technology (EdTech) ● Updated section 22.4.1: added link to UK Safer Internet Centre's resource on appropriate filtering and monitoring ● New section 22.4.2: responsibility of schools regarding information security ● Updated section 24: mirrors an update in KCSIE to better reflect guidance around alternative provision. Added reference to Trust suitability check and monitoring log. ● New section 25: 'Safeguarding separation' - mirrors paragraph in behaviour policy ● New section 29.2: information about informal care arrangements ('kinship care') ● New information added to Appendix 2 and language updated to align with KCSIE ● Placed information about allegations in Appendix 3 and matched it against KCSIE and exemplar Trust safeguarding policy provided by The Key (checked by Forbes Solicitors)
July 2025	AWA	Added information from <i>'Keeping children safe in education'</i> (2025).
June 2024	AWA	Added information from <i>'Keeping children safe in education'</i> (2024).
February 2024	AWA	Added information about changes to statutory guidance: <ul style="list-style-type: none"> - <i>'Working together to safeguard children'</i> (2023)

		<ul style="list-style-type: none"> - Mandatory reporting laws re child sexual abuse (upcoming, in Appendix 2) Link added to Safeguarding Forum Handbook Pending update: guidance to support trans students Language tweaks and updated links
July 2023	BoT	Updated for September 2023 KCSIE
July 2022	BoT	Updated for September 2022 KCSIE
September 2021	BoT	Update for September 2021 KCSIE
September 2020	BoT	Update for September 2020 KCSIE

Appendices

Appendix 1: Indicators of abuse, neglect and exploitation

Appendix 2: Safeguarding Issues

Appendix 3: Procedures for dealing with allegations

Appendix 4: What schools must include in recruitment policy

Appendix 5: Self harm and suicide decision making toolkit

Appendix 1: Indicators of abuse, neglect and exploitation

Based on definitions from the Department for Education's statutory guidance, 'Keeping children safe in education' ([click here](#)).

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. 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, for example, 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 or in an institutional or community setting by those known to them or, more rarely, by others. 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.

<p>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.</p>	
<p>Indicators in the child</p>	
<p>Bruising</p>	<p>It is often possible to differentiate between accidental and inflicted bruises. The following must be considered as non-accidental unless there is evidence or an adequate explanation provided:</p> <ul style="list-style-type: none"> • Bruising in or around the mouth; • Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive); • Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally, for example the back, mouth, cheek, ear, stomach, chest, under the arm, neck, genital and rectal areas; • Variation in colour possibly indicating injuries caused at different times; • The outline of an object used e.g. belt marks, hand prints or a hair brush; • Linear bruising at any site, particularly on the buttocks, back or face; • Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting; • Bruising around the face; • Grasp marks to the upper arms, forearms or leg; • Petechial haemorrhages (pinpoint blood spots under the skin.) Commonly associated with slapping, smothering/suffocation, strangling and squeezing.
<p>Fractures</p>	<p>Fractures may cause pain, swelling and discolouration over a bone or joint. It is unlikely that a child will have had a fracture without the parents/carers being aware of the child's distress. If the child is not using a limb, has pain on movement and/or swelling of the limb, there may be a fracture. There are grounds for concern if:</p> <ul style="list-style-type: none"> • the history provided is vague, non-existent or inconsistent; • there are associated old fractures; • medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement. <p>Rib fractures are only caused in major trauma such as in a road traffic accident, a severe shaking injury or a direct injury such as a kick.</p> <p>Skull fractures are uncommon in ordinary falls, i.e. from three feet or less. The injury is usually witnessed, the child will cry and if there is a fracture, there is likely to be swelling on the skull developing over 2 to 3 hours. All fractures of the skull should be taken seriously.</p>

Mouth Injuries	Tears to the frenulum (tissue attaching upper lip to gum) often indicates force feeding of a baby or a child with a disability. There is often finger bruising to the cheeks and around the mouth. Rarely, there may also be grazing on the palate.
Poisoning	Ingestion of tablets or domestic poisoning in children under 5 is usually due to the carelessness of a parent/carer but it may be self harm even in young children.
Fabricated or Induced Illness	Professionals may be concerned at the possibility of a child suffering significant harm as a result of having illness fabricated or induced by their guardian. Possible concerns are: <ul style="list-style-type: none"> • Discrepancies between reported and observed medical conditions, such as the incidence of fits; • Attendance at various hospitals, in different geographical areas; • Development of feeding / disordered eating, as a result of unpleasant feeding interactions; • The child developing abnormal attitudes to their own health; • Non organic failure to thrive - a child does not put on weight and grow and there is no underlying medical cause; • Speech, language or motor developmental delays; • Dislike of close physical contact; • Attachment disorders; • Low self-esteem; • Poor quality or no relationships with peers because social interactions are restricted; • Poor attendance at school and under-achievement.
Bite Marks	Bite marks can leave clear impressions of the teeth when seen shortly after the injury has been inflicted. The shape then becomes a more defused ring bruise or oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child. A medical/dental opinion, preferably within the first 24 hours, should be sought where there is any doubt over the origin of the bite.
Burns and Scalds	It can be difficult to distinguish between accidental and non-accidental burns and scalds. Scalds are the most common intentional burn injury recorded. Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods or electrical fire elements, burns of uniform depth over a large area, scalds that have a line indicating immersion or poured liquid. It is important to be mindful of previous burns/scalds scars which did not have appropriate treatment or adequate explanation.
Scars	A large number of scars or scars of different sizes or ages, or on different parts of the body, or unusually shaped, may suggest abuse.

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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing 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.

<p>Indicators in the child:</p>	<ul style="list-style-type: none"> • Developmental delay; • Abnormal attachment between a child and parent/carer eg. anxious, indiscriminate or no attachment; • Aggressive behaviour towards others; • Child scapegoated within the family; • Frozen watchfulness, particularly in pre-school children; • Low self-esteem and lack of confidence; • Withdrawn or seen as a 'loner' - difficulty relating to others; • Over-reaction to mistakes; • Fear of new situations; • Inappropriate emotional responses to painful situations; • Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking); • Self-harm; • Fear of parents/carers being contacted; • Extremes of passivity or aggression; • Drug/solvent abuse; • Chronic running away; • Compulsive stealing; • Low self-esteem; • Air of detachment – 'don't care' attitude; • Social isolation – does not join in and has few friends; • Depression, withdrawal; • Behavioural problems e.g. aggression, attention seeking, hyperactivity, poor attention; • Low self-esteem, lack of confidence, fearful, distressed, anxious; • Poor peer relationships including withdrawn or isolated behaviour.
<p>Indicators in the parent/carer:</p>	<ul style="list-style-type: none"> • Domestic abuse, adult mental health problems and parental substance misuse may be features in families where children are exposed to abuse; • Abnormal attachment to child e.g. overly anxious or disinterest in the child; • Scapegoats one child in the family; • Imposes inappropriate expectations on the child e.g. prevents the child's developmental exploration or learning, or normal social interaction through overprotection; • Wider parenting difficulties may (or may not) be associated with this form of abuse.
<p>Indicators in the family/environment</p>	<ul style="list-style-type: none"> • Lack of support from family or social network; • Marginalised or isolated by the community; • History of mental health, alcohol or drug misuse or domestic violence; • History of unexplained death, illness or multiple surgery in parents/carers and/or siblings of the family; • Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. 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. Sexual abuse can take place online, and technology can be used

to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Indicators in the child:

Physical presentation	<ul style="list-style-type: none"> ● Urinary infections, bleeding or soreness in the genital or anal areas; ● Recurrent pain on passing urine or faeces; ● Blood on underclothes; ● Sexually transmitted infections; ● Vaginal soreness or bleeding; ● Pregnancy in a younger girl where the identity of the father is not disclosed and/or there is secrecy or vagueness about the identity of the father; ● Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.
Emotional/behavioral presentation:	<ul style="list-style-type: none"> ● Makes a disclosure; ● Demonstrates sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit; ● Inexplicable changes in behaviour, such as becoming aggressive or withdrawn; ● Self-harm - eating disorders, self-mutilation and suicide attempts; ● Poor self-image, self-harm, self-hatred; ● Reluctant to undress for PE; ● Running away from home; ● Poor attention / concentration (world of their own); ● Sudden changes in school work habits, become truant; ● Withdrawal, isolation or excessive worrying; ● Inappropriate sexualised conduct; ● Sexually exploited or indiscriminate choice of sexual partners; ● Wetting or other regressive behaviours e.g. thumb sucking; ● Draws sexually explicit pictures; ● Depression.

Neglect: 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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

Indicators in the child:

Physical presentation	<ul style="list-style-type: none"> ● Failure to thrive or, in older children, short stature; ● Underweight; ● Frequent hunger; ● Dirty, unkempt condition; ● Inadequately clothed, clothing in a poor state of repair; ● Red/lilac mottled skin, particularly on the hands and feet, seen in the winter due to cold; ● Swollen limbs with sores that are slow to heal, usually associated with cold injury ● Abnormal voracious appetite; ● Dry, sparse hair; ● Recurrent / untreated infections or skin conditions e.g. severe nappy rash, eczema or persistent head lice / scabies/ diarrhoea; ● Unmanaged / untreated health / medical conditions including poor dental health; ● Frequent accidents or injuries.
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Indicators in the parent/carer:	<ul style="list-style-type: none">● Disinterested or undisturbed by accident or injury;● Aggressive towards child or others;● Unauthorised attempts to administer medication;● Tries to draw the child into their own illness;● Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault;● Parent/carer may be over involved in participating in medical tests, taking temperatures and measuring bodily fluids;● Observed to be intensely involved with their children, never taking a much needed break nor allowing anyone else to undertake their child's care;● May appear unusually concerned about the results of investigations which may indicate physical illness in the child;● Wider parenting difficulties, may (or may not) be associated with this form of abuse;● Parent/carer has convictions for violent crimes.
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Appendix 2: Safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Issues are described in detail below in alphabetical order.

If staff have any queries – they should speak to and seek the advice of the DSL.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on the UK Council of Internet Safety's advice for education settings ([click here](#)).

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.

1. Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from children and young people 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 chat rooms 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;
- moved from a public to a private/E2EE platform; and/or
- 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.

2. 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. Throughout 2022 and 2023, there has been a considerable increase in reporting of these incidents. 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; and/or
- 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; and/or
- 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

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. Visitors are responsible for keeping their belongings, including their mobile phone(s), safe during their visit. If the visitor is unknown to the setting, the school will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce photo identification. Visitors are expected to use the school's sign-in system and wear a visible lanyard at all times. Visitors to the school who are onsite for a professional purpose, such as educational psychologists and school improvement advisors, will be asked to show photo ID and:

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

These visitors will be issued with a yellow Trust lanyard. All other visitors, including visiting speakers, will be accompanied by a member of staff at all times and will wear a red Trust lanyard. 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 students or staff.

Child-on-child abuse

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers (this is sometimes known as 'teenage relationship abuse').
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.

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

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content. If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in the main body of this policy, as appropriate. In particular, other areas of this appendix set out more detail about our school's approach to this type of abuse. When considering instances of harmful sexual behaviour between children, schools will consider their ages and stages of development. Schools recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Child criminal exploitation (CCE)

CCE is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Indicators of CCE can include a child:

- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- suffering from changes in emotional wellbeing;
- misusing drugs and alcohol;
- going missing for periods of time or regularly coming home late;
- regularly missing school or education; and/or
- not taking part in education.

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

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online.

For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. In addition to the CCE indicators above, indicators of CSE can include a child:

- having an older boyfriend or girlfriend; and/or
- 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.

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- are at risk of harm or neglect;
- are at risk of forced marriage or FGM;
- come from Gypsy, Roma, or Traveller families;
- come from the families of service personnel;
- go missing or run away from home or care;
- are supervised by the youth justice system;
- cease to attend a school; and/or
- come from new migrant families.

Schools will follow procedures for unauthorised absence as set out in the Trust's attendance policy and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points. 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 missing, such as travelling to conflict zones, FGM and forced marriage. If a staff member suspects that a child is suffering from harm or neglect, they should report it to their DSL (or a deputy), who will follow local child protection procedures, including with respect to making reasonable enquiries. The DSL (or a deputy) 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.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other forms of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral

Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, staff must speak to the DSL (or a deputy).

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent-to-parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims. Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the DSL) before the child or children arrive at school the following day. The DSL will provide support according to the child's needs and update records about their circumstances.

FGM

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

- a student confiding in a professional that FGM has taken place;
- a mother/family member disclosing that FGM has been carried out; and/or
- a family/student already being known to social services in relation to other safeguarding issues.

A girl:

- having difficulty walking, sitting or standing, or looking uncomfortable;
- finding it hard to sit still for long periods of time (where this was not a problem previously);
- spending longer than normal in the bathroom or toilet due to difficulties urinating;
- having frequent urinary, menstrual or stomach problems;
- avoiding physical exercise or missing PE;

- being repeatedly absent from school, or absent for a prolonged period;
- demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour;
- being reluctant to undergo any medical examinations;
- asking for help, but not being explicit about the problem; and/or
- talking about pain or discomfort between her legs.

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

- the girl's family having a history of practising FGM (this is the biggest risk factor to consider);
- FGM being known to be practised in the girl's community or country of origin;
- a parent or family member expressing concern that FGM may be carried out; and/or
- a family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- having a mother, older sibling or cousin who has undergone FGM;
- having limited level of integration within UK society;
- confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman";
- talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period;
- requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
- talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion);
- being unexpectedly absent from school; and/or
- having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

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

Responding to concerns around FGM

'Keeping children safe in education' explains that FGM comprises 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs'. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Any teacher who either:

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

Must immediately report this to the police, personally. This is a mandatory statutory duty and staff will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate. Any other member of staff who discovers that an act of FGM appears to have been carried out on a child under 18 must speak to the DSL and follow our local safeguarding procedures. The duty for staff mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students. Any member of staff who suspects a student is at risk of FGM or suspects that FGM has been carried out, or discovers that a student aged 18 or over appears to have been a victim of FGM, should speak to the DSL and follow local safeguarding procedures.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved. Staff will receive training around forced marriage and the presenting symptoms. DSLs are aware of the '1 chance' rule, ie. we may only have 1 chance to speak to the potential victim and only 1 chance to save them. If a member of staff suspects that a child is being forced into marriage, they will speak to the child about their concerns in a secure and private place. They will then report this to the DSL. The DSL will:

- speak to the child about the concerns in a secure and private place;
- activate the local safeguarding procedures and refer the case to the local authority's designated officer;
- seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- refer the child to an education welfare officer, pastoral tutor, learning mentor or school counsellor, as appropriate.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and deputies) will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures). Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

Mental health

All staff should be aware that 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. Only trained professionals should make a diagnosis of a mental health problem, but staff are well placed to observe children and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one. Abuse, neglect, exploitation and other traumatic adverse childhood experiences can have a lasting impact, and it's essential that staff are aware of how these experiences can affect children's mental health, behaviour and education. Staff should take action on any mental health concerns that are also safeguarding concerns, following the school's safeguarding procedures and speaking to the DSL or deputy. DfE has guidance available on preventing and tackling bullying and mental health and behaviour

Modern slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the statutory guidance document '*Modern slavery: how to identify and support victims*' ([click here](#)).

Radicalisation, extremism and terrorism

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - Negate or destroy the fundamental rights and freedoms of others; or
 - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or

- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They will make sure that staff have access to appropriate training to equip them to identify children at risk. They will also regularly assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in the local area, in collaboration with local safeguarding partners and local police force. The DSL will ensure that suitable internet filtering is in place, and equip students to stay safe online at school and at home. There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in students' behaviour. The government website Educate Against Hate ([click here](#)) and charity NSPCC ([click here](#)) say that signs that a child is being radicalised can include:

- refusal to engage with, or becoming abusive to, peers who are different from themselves;
- becoming susceptible to conspiracy theories and feelings of persecution;
- changes in friendship groups and appearance; and/or
- rejecting activities they used to enjoy.

If staff have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible the staff member should speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team. The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff [and local governors – if applicable] can call to raise concerns about extremism with respect to a student. Staff can also email counter.extremism@education.gov.uk Note that this is not for use in emergency situations. In an emergency, staff must call 999 or the confidential anti-terrorist hotline on 0800 789 321 if they:

- think someone is in immediate danger;
- think someone may be planning to travel to join an extremist group; and/or
- see or hear something that may be terrorist-related.

Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations.

Serious violence

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; and/or
- unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

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

- being male;
- having been frequently absent or permanently excluded from school;
- having experienced child maltreatment; and/or
- having been involved in offending, such as theft or robbery.

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

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment 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; and/or
- online and face to face (both physically and verbally).

Sexual violence and sexual harassment exist on a continuum and may overlap. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and 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; and
- 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 children who may be LGBTQIA+ 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; and
- 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 could lead to normalising them.

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

Sharing of nudes and semi-nudes ('sexting')

This is a suggested approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

Responsibilities when responding to an incident

If a member of staff is made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), they must report it to the DSL immediately. They must not:

- view, copy, print, share, store or save the imagery themselves or ask a student to share or download it (if the member of staff has already viewed the imagery by accident, this must be reported to the DSL);
- delete the imagery or ask the student to delete it;
- ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);
- share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers; or
- say or do anything to blame or shame any young people involved

The member of staff should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate 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 student(s);
- if a referral needs to be made to the police and/or local authority 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 student(s) involved which would influence risk assessment;
- if there is a need to contact another school, college, setting or individual; and
- whether to contact parents/carers of the students involved (in most cases parents/carers should be involved).

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

- the incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See Appendix 4 for more information on assessing adult-involved incidents;
- 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 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; and/or
- the DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

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

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or local authority 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 student(s) involved (if appropriate). If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to local authority children's social care and/or the police immediately.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done via calling 101 or 999.

Recording incidents

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

Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education curriculum, which is part of the school's wider provision of personal, social, health and economic education (PSHE). Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Students also learn the strategies and skills needed to manage:

- specific requests or pressure to provide (or forward) such images; and
- the receipt of such images.

Information about the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the school will follow in the event of an incident. Teaching follows best practice in delivering safe and effective education, including:

- putting safeguarding first;
- approaching from the perspective of the child;
- promoting dialogue and understanding;
- empowering and enabling children and young people;
- never frightening or scare-mongering; and
- challenging victim-blaming attitudes.

So-called 'honour-based' abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Appendix 3: Recommended procedures for dealing with allegations

This section is based on ‘Section 1: Allegations that may meet the harm threshold’ in part 4 of ‘*Keeping children safe in education*’.

In the event of an allegation that meets the criteria set out in **Section 15.2**, the case manager should take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the LADO at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed and whether it is necessary to involve the police and/or local authority children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children’s social care services, where necessary). Where the police and/or local authority children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children’s social care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual’s family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children’s social care.
 - **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
 - **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
 - **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children’s social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents/carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents/carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
- For early years provision: we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
- If the Trust is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the Trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the Trust, such as a supply teacher or contracted staff member provided by an agency, the case manager will take the actions below in addition to the Trust's standard procedures.

- The case manager will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The case manager will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school/Trust, while the school carries out the investigation.
- The case manager will involve the agency fully but the school/trust will take the lead in collecting the necessary information and providing it to the LADO as required.
- The case manager will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (this will be done, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, staff will inform them of our process for managing allegations and keep them updated about our policies as necessary. Staff will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

Case managers will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, case managers will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the Trust will make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the Trust's CEO will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the school's DSL (or Trust's safeguarding lead) will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The Trust will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file). For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate. We will retain all records at least until the accused individual has reached normal pension age or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, appropriate Trust staff will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.
- Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the Trust's procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.
- The use of suspension when the individual is subsequently reinstated. The Trust will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened. Trust staff will report any non-recent allegations made by a child to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Where an adult makes an allegation to the school that they were abused as a child, they will advise the individual to report the allegation to the police.

Appendix 4: What schools must include in recruitment policy

The following aspects of safer recruitment are documented in the Trust's safer recruitment policy. They are based on part 3 of 'Keeping children safe in education'.

To make sure the Trust recruits suitable people, it will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. The Trust has put the following steps in place during its recruitment and selection process to ensure that it is committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, the Trust will make clear:

- Its commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed and if they are disclosed, we cannot take them into account

Application forms

Application forms will include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity). Job adverts where the application for is placed will include a copy of, or link to, this safeguarding policy as well as the policy on the employment of ex-offenders.

Shortlisting

The shortlisting process will involve at least two people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once candidates have been shortlisted, they will be asked to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we may ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

Anyone offered a role of substantive employment will undertake a social media check, carried out by a third-party application, as a pre-employment check.

Seeking references and checking employment history

The Trust will endeavour to obtain references before interview where possible and where a shortlisted candidate has provided their consent to do so. Any concerns raised will be explored further with referees and taken up with the candidate at interview. When seeking references, the Trust will:

- not accept open references;
- liaise directly with referees and verify any information contained within references with the referees;

- ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, the Trust will ask for the reference to be confirmed by the headteacher, or other appropriate leader, as accurate in respect to disciplinary investigations;
- obtain verification of the candidate's most recent relevant period of employment if they are not currently employed;
- secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children;
- compare the information on the application form with that in the reference and take up any inconsistencies with the candidate; and
- resolve any concerns before any appointment is confirmed.

A contract of employment will not be issued until the Trust has received at least two satisfactory references.

Interview and selection

When interviewing candidates, the panel will:

- probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this;
- explore any potential areas of concern to determine the candidate's suitability to work with children;
- record all information considered and decisions made; and
- ensure that shortlisted candidates have signed a hard copy of their application form confirming the details that they have provided.

Pre-appointment vetting checks

Staff involved in recruitment will record all information on the checks carried out in the Trust's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. The Trust follows requirements and best practice in retaining copies of these checks, as set out below.

New staff

A written offer of employment will be sent to the successful applicant and will be conditional upon the following:

- receipt of at least two satisfactory written references (one of which must be their current or most recent employer);
- verification of the applicant's identity, preferably from current photographic ID and proof of address;
- verification of right to work in the UK;
- verification of the applicant's medical fitness;
- verification of qualifications where relevant;
- verification of professional status where applicable. For teachers, this will include checking that the individual has the required teaching qualification and has successfully completed any statutory induction, if required, through the Teacher Services System;
- satisfactory enhanced DBS check;
- satisfactory certificate of Good Conduct (if applicable) which may include EEA sanctions and restrictions;
- satisfactory Barred list check (except supervised volunteers);
- satisfactory teacher prohibition (if applicable);
- satisfactory Section 128 check through the Teacher Regulation Agency (applicable to governors/trustees, headteachers, members of the senior leadership team and departmental heads only);
- satisfactory online searches; and
- confirmation that the applicant is not disqualified from providing childcare under the Childcare Disqualification Act 2006.

Regulated activity means a person who will be:

- responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

In certain circumstances the Trust will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- there are concerns about an existing member of staff's suitability to work with children; or
- an individual moves from a post that is not regulated activity to one that is; or
- there has been a break in service of 12 weeks or more.

The Trust will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where the Trust:

- believes the individual has engaged in [relevant conduct](#); or
- believes the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- believes the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- has removed the individual from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

The Trust will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. The Trust will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

The Trust will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a private finance initiative or similar contract). This will be:

- an enhanced DBS check with barred list information for contractors engaging in regulated activity;
- an enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

The Trust will obtain the DBS check for self-employed contractors. Copies are not taken nor kept. The DBS certificate will be checked and verified by someone with the appropriate authority. The DBS number and the date on which the check was undertaken will be recorded on the SCR. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. Recruiting staff will check the identity of all contractors and their staff on arrival at the school. Where required by the relevant legislation: For individual contractors such as music teachers or sports coaches, recruiting staff will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where recruiting staff decide that an individual falls outside of the scope of these regulations and they do not carry out such checks, and following consultation with the Trust's director of people, they will retain a record of the assessment. This will include an evaluation of any risks and control measures put in place, as well as any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried, the Trust will ensure that all necessary checks are carried out, in the same way as all other teachers. Where trainee teachers are fee-funded, the Trust will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children. Where required by the relevant legislation: In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

The Trust will:

- never leave an unchecked volunteer unsupervised or allow them to work in regulated activity;
- obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity;
- carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. The Trust's director of people should always be consulted before confirming the risk assessment; and
- where required by the relevant legislation: Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where recruiting staff decide that an individual falls outside of the scope of these regulations and they do not carry out such checks, they will retain a record of the assessment. This will include an evaluation of any risks and control measures put in place, as well as any advice sought.

Trustees, members and local governors

All trustees, local governors and members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)) – NB. section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where schools in the Trust place a student with an alternative provision provider, they will obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that the Trust would otherwise perform.

Adults who supervise students on work experience

When organising work experience, schools in the Trust will ensure that policies and procedures are in place to protect children from harm. The school will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Students staying with host families

Where the school makes arrangements for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), they will request enhanced DBS checks with barred list information on those people. Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, they will work with partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 5: Self harm and suicide decision-making toolkit

Concern	Action	Support to be offered as appropriate to the student
Student presents with superficial cuts/scratches	<ul style="list-style-type: none"> ● Safeguarding team made aware and discuss with the student ● Pastoral support offered, this may include counselling or mentoring ● Parents/carers contacted and advised to take their child to the GP 	<p>WeStrive mentor</p> <p>Mental Health First Aider</p> <p>School counsellor</p>
Student presents with cuts	<ul style="list-style-type: none"> ● Safeguarding team made aware and discuss with the student ● Pastoral support offered ● Parents/carers contacted and advised to take their child to the GP ● School to make a CAMHS referral ● Individual risk assessment composed for the student and shared with relevant members of staff, student and parent/carer 	<p>Pastoral and Assistant Pastoral Directors</p> <p>External links shared:</p> <ul style="list-style-type: none"> ● Kooth ● Young Minds ● Samaritans ● Childline ● Wellbeing apps ● Links counselling.
Student discloses that they have suicidal thoughts	<ul style="list-style-type: none"> ● Safeguarding team made aware and discuss with the student ● Pastoral support offered ● Parents/carers contacted and advised to take their child to A and E ● Individual risk assessment composed for the student and shared with relevant members of staff, student and parent/carer 	<p>Where appropriate advice will be sought from the school nurse, safeguarding borough lead and MASH team</p>
Student discloses that they have attempted suicide out of school hours	<ul style="list-style-type: none"> ● Safeguarding team aware and discuss with the student ● Pastoral support offered ● Parents/carers are contacted and individual discussion takes place to ascertain what has happened and medical intervention. ● Individual risk assessment composed for the student and shared with relevant members of staff, student, parent/carer 	<p>Where appropriate advice will be sought from the school nurse, safeguarding borough lead and MASH team</p>
Student self harms/attempts suicide in school	<ul style="list-style-type: none"> ● Ambulance to be called ● Parents/carers contacted to accompany their child in the ambulance. If parents/carers are not available a member of the pastoral team to accompany. ● Follow up risk assessments and support organised as appropriate to the student 	<p>Where appropriate advice will be sought from the school nurse, safeguarding borough lead and MASH team</p>
The School is notified by an external agency that a student has attempted suicide / self harmed	<ul style="list-style-type: none"> ● Safeguarding team made aware and discuss with the external agency regarding support required. ● Individual risk assessment composed for the student and shared with relevant members of staff, student and parent/carers as appropriate 	<p>Where appropriate advice will be sought from the school nurse, safeguarding borough lead and MASH team</p>

Vanguard Learning Trust



As a group of local primary and secondary schools, Vanguard Learning Trust's mission is to serve its local community by providing outstanding, inclusive education. We have a collective purpose and responsibility to provide effective teaching, through a curriculum based on equality of opportunity and entitlement that allows our students to shine both in and out of the classroom. Each school in the Trust has its own ethos, which also complements the Trust's vision and values, and the common aspiration that all students can achieve their potential.

Safeguarding and child protection policy September 2025

Part B: Hermitage Primary school

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Part B: Hermitage Primary School

1. Key contacts

1.1 The school safeguarding team

The school's headteacher is Nicholas Hingley. The school's safeguarding team is comprised of:

- Designated Safeguarding Lead: Parmjit Kaur Varaitch
- Deputy Designated Safeguarding Lead: Rachel Langford
- Deputy Designated Safeguarding Lead: Georgia Harling
- Deputy Designated Safeguarding Lead: Nicholas Hingley

They can all be contacted through the school email: safeguarding@hermitageprimary.org.uk

The school telephone number is: 01895 234871. The school's designated teacher for looked-after children is Rachel Langford (SENCo).

1.2 Governance

The school's chair of governors is Kirsty Farrell and the school's safeguarding-lead governor is Ann-Marie Taylor Kent. They can be contacted via email:

- Ann-Marie Taylor-Kent: ataylorkent@vlt.org.uk
- Kirsty Farrell: kfarrell@vlt.org.uk

1.3 Third-party contact information

The table below outlines other important information that can be used to contact a third party.

Post	Contact details
Local Authority Designated Officer (LADO)	Hannah Ives Contact number: 01895 250975 / 07753 431285 Email address: lado.contact@hillingdon.cjsm.net hives@hillingdon.gov.uk
Channel Helpline	Contact number: 020 7340 7264 Email address counter.extremism@education.gov.uk
Hillingdon's Local Safeguarding Children Board	Contact number: 01895 556 006
Lead Child Protection Advisor for School	Nicole Diamond Contact number: 07943097366 Email address: ndiamond@hillingdon.gov.uk
Hillingdon Children's Services Stronger Family Hub	<ul style="list-style-type: none">• 01895 556006 - Monday to Thursday 8:45 am to 5:00pm; Friday 8:45 am to 4:45 pm• 01895 250 111 - Out of office hours, including weekends Do not use this number if a child needs immediate assistance from the Police or Ambulance Services. In these cases, call 999• Portal: click here
Hillingdon Stronger Families	Contact number: 01895 556006 Website: click here
Prevent Lead	Fiona Gibbs Email address: fgibbs@hillingdon.gov.uk

Hillingdon Virtual School	Email: virtualschooladmin@hillingdon.gov.uk
Uxbridge North Local Police Team	020 7161 8170/71
Hillingdon EVOLVE lead (Trips)	Jake Wild jake@evolveadvice.co.uk

2. Promoting culture of safeguarding

Safeguarding is an integral part of how Hermitage Primary School operates at every level. The school embeds an open culture by:

- having a clear commitment to continued professional development for all staff which ensures safeguarding is a regular feature of the day-to-day-life of the school. It is at the forefront of ongoing strategic improvement (regular safeguarding briefings, sequence of safeguarding training for all staff (including volunteers/long term supply staff). It also involves ensuring that all staff are clear about their responsibility when 'low level concerns' are observed and the immediate action that is required (discussion in person with the headteacher;
- immediately addressing concerns raised by students and parents/carers about safeguarding concerns that have taken place offsite and online;
- staff illustrating professional curiosity by stopping and questioning any adult on the school site who is not wearing a school lanyard, and in the case of a red lanyard, ensuring they are not unaccompanied at any time whilst on the school site;
- ensuring children are aware of whom they can speak to in school and signposting them, their families to sources of support making them readily visible, promoted and available;
- empowering children to speak out about concerns for themselves and others both in school and in their wider life. This is mainly achieved through the strong relationships that all staff seek to secure with students at the school;
- ensuring children are acutely aware of the members of the safeguarding team (yellow posters throughout the school, yellow lanyards worn by the DSLs) and encouraging them to speak to any member of staff to whom they feel comfortable in expressing concerns;
- recognising that some groups of children may be more vulnerable than others, therefore the protective characteristics identified in the Equality Act (2010) are regularly discussed with students;
- taking positive action, where it is deemed necessary, to deal with particular disadvantages affecting groups of children with a particular protected characteristic, for example supporting girls if evidence suggested they were being disproportionately affected by sexual harassment; and
- ensuring all children, including those with a particular protected characteristic, have a trusted adult.

3. Student welfare and wellbeing

3.1 The school's approach

Hermitage Primary School has a comprehensive approach towards child welfare and wellbeing with a pastoral approach that involves all staff, in addition to particular targeted support from the school's safeguarding team, SENCo, lead attendance officer, school welfare officer and pupil wellbeing mentor. Children at the school are educated on the roles of these members of staff as well as their location via the '5 Helps' poster found across the school; this encourages children to seek support from a range of different staff members. The school welfare officer has a range of first aid training, along with other members of staff this ensures that medical treatment can be offered swiftly when needed. Further medical intervention based on assessment of injuries will result in a call to 101 or 999 as well as parents/carers being informed immediately. All children with medical health needs have a medical plan,

co-produced with parents/carers and other relevant health services. Plans are held centrally in the medical room as well as in the classroom 'Yellow Medical Bags'.

3.2 Mental health and emotional wellbeing

Children's mental health and wellbeing is a priority across the whole school and a plethora of strategies are embedded to ensure all children can access the support they need. This includes:

- a dedicated mental health pastoral team;
- mentoring and targeted support achieved via the SENCo, DSLs and pupil wellbeing mentor;
- regular assemblies and lesson activities (promoted through World Mental Health Day, Empathy Day and Place 2Be's Children's Mental Health Week);
- weekly Citizenship Time sessions that incorporate grounding activities that teach children how they can manage anxiety via the use of particular strategies;
- daily mindfulness involving all children, activities range from mindful breathing, mindful moves to mindful mark making;
- class 'Kindness Jars' to instil kindness, manners and inclusion for all;
- weekly personal, health, social and economic education (PSHE) lessons via the Jigsaw scheme. This scheme is also used to teach relationships and sex education (RSE), appropriate to the age and stage of the child; and
- 'Worry Eaters' in each classroom, allowing children to share their worries without direct communication with staff members ('Worry Eaters' are checked daily by class staff).

3.3 Working with external agencies

The school also commissions external agencies to support the work of school staff. This includes educational psychologists, speech and language therapists and occupational therapists. The school works closely with other services in the borough, regularly signposting parents/carers to interventions that they can access outside of school (such as Brilliant Parenting, Self-E programme and Bounce Programme – facilitated via Adolescent Development Services, Early Help). Where children are educated off-site during an alternative provision placement, appropriate safeguarding checks are completed by the school to ensure that children are learning in an environment that is safe and secure. Frequent contact with any offsite provision is maintained via weekly reports for attendance and learning.

3.4 LGBTQIA+

The school is aware that children who are LGBTQIA+ can be more vulnerable and targeted by other children. In some cases, a child who is perceived by other children to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+. Hermitage Primary School promotes diversity and equality and recognises the importance of LGBTQIA+ students having a trusted adult with whom they can be open with. School staff tackle all forms of discrimination and signpost support for LGBTQIA+ children and families in addition to ensuring students are exposed to positive role models who are part of the LGBTQIA+ community and allies.

4. Handling concerns

4.1 Raising a concern about a child

Any member of staff who receives a disclosure of abuse or has concerns about the safety or potential abuse of a child must report their concerns to the DSL **without delay**. This includes allegations made against other children. Staff at Hermitage are encouraged to apply the seven R principles:

Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

Reassure

- Reassure the child but only so far as is honest and reliable
- Do not make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'

- Do reassure e.g. you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

Respond

- Respond to the child only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'Did he touch your private parts?' or 'Did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not criticise the alleged perpetrator; the student may care about him/her, and reconciliation may be possible
- Do not ask the child to repeat it all for another staff member. Explain what you must do next and whom you must talk to. Reassure the student that it will be a senior member of staff

Report

- Share concerns with the lead DSL as soon as possible, in her absence with the deputy DSL
- If neither is available with the headteacher

Record

- Complete your written concern on the school's safeguarding reporting platform
- Record the time, place, persons present and noticeable nonverbal behaviour, as well as the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- Complete a body map to indicate the position of any noticeable bruising, marking
- Record facts only and observable things, rather than your 'interpretations' or 'assumptions'

Remember

- Support the child: listen, reassure and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Try to get some support for yourself if you need it

Review (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

4.2 Responding to concerns

On receipt of a concern or disclosure, the school's safeguarding team will carry out the following steps.

- Decide whether to make a referral to Hillingdon multi-agency safeguarding hub (known as 'MASH') based on a child being in **IMMEDIATE HARM or RISK** or to monitor the situation through the school's internal monitoring systems (vulnerable pupils register). Parents/carers will be informed about the concern, where appropriate to do so. The DSL will decide on an appropriate action in consultation with the headteacher.
- Inform the person raising the initial concern of her decision and subsequent monitoring actions necessary.
- Contact MASH immediately for any additional advice/support.
- A telephone referral will be confirmed in writing within 24 hours. Hillingdon's inter-agency referral form will be used. If the outcome is below the threshold for statutory assessment, the school will support a referral to Team Around a Family (TAF). The TAF coordinator will be contacted and parents/carers will need to be in agreement for the referral to commence.
- In the case of suspected Female Genital Mutilation: The Department for Education's Keeping Children Safe in Education explains that FGM comprises 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs'. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a child has already been subjected to FGM, and factors that suggest a child may be at risk, are set out in Part

A of this policy. **Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a child under 18 must immediately report this to the police, personally. This is a statutory duty and teachers will face disciplinary sanctions for failing to meet it. Unless they have a good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate. Any other member of staff who discovers that an act of FGM appears to have been carried out on a child under 18 must speak to the DSL and follow local safeguarding procedures. The duty for teachers mentioned above does not apply in cases where a child is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine children.

- In the case of suspected extremism, if a child is not at immediate risk of harm, where possible, the DSL will agree on a course of action. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a child. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
 - ☒ Think someone is in immediate danger
 - ☒ Think someone may be planning to travel to join an extremist group
 - ☒ See or hear something that may be terrorist-related

4.3 Incidents involving nude/semi-nude images or videos

4.3.1 Immediate response

In the case of an incident involving nude/semi-nude images or videos: (also known as 'sexting' or 'youth-produced sexual imagery'), staff must report it to the DSL immediately. Staff must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a child to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the child to delete it
- Ask the child/children 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 child/children it involves or their, or other, parents/carers
- Say or do anything to blame or shame any child involved

You should explain that you need to report the incident and reassure the child/children that they will receive support and help from the DSL. The phone will need to be confiscated and handed to the DSL. The DSL will also make reference to the Department for Education guidance 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (2024, [click here](#)). If a decision is made to view imagery, the DSL would need to be satisfied that viewing:

- is the only way to decide whether to involve other agencies because it is not possible to establish the facts from any child or young person involved
- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or young person or parent/carer in making a report
- is unavoidable because a child has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network

4.3.2 Initial review meetings

Following a report of an incident, the DSL will hold an initial review meeting with the appropriate school staff. This may include the staff member who reported the incident, as well as a member of the school's senior leadership team. This meeting will consider the initial evidence and aim to determine the following:

- Whether there is an immediate risk to a child/children
- 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 child/children (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 students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents/carers of the children involved (in most cases parents/carers should be involved)

4.3.3 Subsequent actions

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

- The incident involves an adult
- A criminal offence has taken place
- There is reason to believe that a child has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the child's developmental stage or are violent
- The imagery involves sexual acts and any child in the images or videos is under 13
- The DSL has reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

4.3.4 Further reviews and informing others

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 child/children involved (if appropriate). If at any point in the process, there is a concern that a child has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately. 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 student at risk of harm. If a criminal offence has taken place it is necessary to refer an incident to the police, this will be done initially through:

- Contacting Uxbridge North local Police team for advice – 020 7161 8170/71
- Or upon their advice contact 101 or 999

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out below in section 5 of this policy also apply to recording these incidents.

5. Recording information

Staff log all concerns and disclosures onto the school's secure online safeguarding reporting system. Staff are expected to observe the following expectations:

1. Factual information only - information must be objective
2. Use initials for students/staff in the body of the report
3. Do not use the system for sharing messages between staff
4. Use direct quotes from children (ie. their own language), avoiding staff translation or opinions
5. Ensure the date/time are correctly selected
6. Bullet point presentation only, using hyphens at the start of each line/sentence
7. Apply the following structure in the body of the report, where appropriate:

- a. Child voice
- b. School actioned (ie. any steps taken to resolve the risk of harm)
- c. School to action (necessary next steps)

All subsequent actions/responses taken by the DSL team are also recorded onto the safeguarding reporting platform using the 'add action' feature. Any evidence linked to the concern is also uploaded to the platform (visuals, student accounts, emails etc) by the DSLs. Records may be used at a later date to support a referral to an external agency or for legal proceedings. Within the safeguarding reporting platform, higher access is only available to key staff. Confidential information is held securely in either student school files or their historical paper safeguarding files.

6. Multi-agency working and referral process

Referrals to outside agencies may be necessary for a variety of reasons; examples include referrals to the local authority's 'early help' services, which can provide access to timely support and resources that can support young people and their families, as well as referrals to the local authority's attendance team that can be made where children are at risk of missing education. Where a referral is considered necessary, a member of the DSL team will take the lead on the referral process. DSLs will also utilise direct support from MASH by making a phone call to Hillingdon Stronger Families to speak with the duty social worker (section 1 contains contact details). A written referral is then made through the online portal Stronger Families Hub ([click here](#)), normally within 24 hours of the concern being raised. The type of referral made is considered in relation to harm or the risk of harm to the child. Referrals are normally made in agreement with parents/carers, however, upon Children's Services advice, an agreement is not sought when it increases the level of harm or risk to a child. The DSL will keep each case under constant review and the school will consider another referral to local authority children's social care if the situation does not seem to be improving. If a teacher makes a referral directly, they must tell the DSL/DDSL as soon as possible, in person. The DSL team will always seek feedback on a referral if they have not heard anything from Children's Services. Children's Services through written communication will indicate an outcome to the referral made:

- Referral has met the threshold for a child and family assessment
- The referral has not met a threshold for an assessment, and the school is advised of alternative supports for the child/family. Where this is the case, the DSL team act upon the advice and signpost support for the child/family as well as any subsequent referrals to the local authority's 'Early Help' team, SEND team etc.

Further information on the Stronger Families referral process and escalation can be found on the local authority's website ([click here](#)). When statutory social care assessments take place in school, a private room will be provided for the assessment to take place. Children will always be asked if they prefer a member of the safeguarding team to stay with them during these assessments.

7. Information sharing

Timely information sharing is essential to effective safeguarding. Staff have due diligence to the General Data Protection Regulation (GDPR) and Data Protection Act 2018, however, recognise that this does not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. Information will be shared with due regard to the seven golden rules set out in the Department for Education document 'Information Sharing: Advice for practitioners providing safeguarding services' (2024, [click here](#)). An excerpt is provided below. Before sharing information with the police, a 'Record of Information Passed to the Police' form will need to be completed and saved via the school's online safeguarding reporting platform. The form details the information required by the police, the purpose and the relevant permissions. The form should be completed and authorised by a member of the school's senior leadership team. Staff will ensure the information they share is necessary for the purpose for which they share it. They will share it only with those people who need to have it, information will be accurate, up-to-date, shared in a timely fashion and also shared securely via the school's safeguarding reporting platform. If staff are in any doubt about sharing information, they should speak to the DSL or DDSL. Hermitage Primary School uses a secure platform for recording, reporting and communicating information

linked to safeguarding and child protection issues. A secure email information sharing platform is used to share confidential information with police, medical, educational and social care agencies.

The Seven golden rules for sharing information (including personal information):

- 1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them.** The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework¹ to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.
- 2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child²and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why.** You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).
- 3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.** You need a lawful basis³ to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm⁴, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.
- 4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.** Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. Instead, find out who in your organisation/agency can provide advice about what information to share and with whom. This may be your manager/supervisor, the designated safeguarding children professional, the data protection/information governance lead (e.g., Data Protection Officer⁵), Caldicott Guardian, or relevant policy or legal team. If you work for a small charity or voluntary organisation, follow the NSPCC's safeguarding guidance.
- 5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.**

6. **Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services.** Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.
7. **Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.** When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

Hermitage Primary School is part of the police initiative ‘Operation Encompass’ and receives confidential safeguarding alerts from the police regarding incidents of domestic abuse, where Hermitage students have been present. Any information received is transferred onto the secure safeguarding platform by the DSL and appropriate pastoral action is taken. When children leave the school their original safeguarding file is either:

- sent securely via recorded delivery (this is normally the case when the child/family have moved out of the borough)
- or hand delivered directly to another local school by a member of the DSL team.

Files are sent within 5 working days of the child leaving the school. Written signatures via a form are required from the recipients of the file. If the student is elective home-educated their safeguarding file is archived. As per ERMS Document Retention Guidelines, students’ files will be kept until they turn 25 years old. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

8. Child-on-child abuse

8.1 Minimising the risk of harm

All staff are made aware of types of child-on-child abuse (as outlined in Part A of this policy) and should report any incidents of child-on-child abuse to the DSL team. The school attempts to minimise the risk of child-on-child abuse by:

- challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images;
- providing a developmentally appropriate PSHE/RSE curriculum which develops children's understanding of acceptable behaviour and keeping themselves safe;
- having systems in place for any child to raise concerns with staff, knowing that they will be listened to, believed and valued;
- delivering targeted work on assertiveness and keeping safe to those students identified as being at risk;
- developing robust risk assessments and providing targeted work for children identified as being a potential risk to other children;

- being vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys;
- ensuring the curriculum helps to educate students about appropriate behaviour and consent
- ensuring children know they can talk to staff confidentially by speaking to staff at any time, allowing their parents/carers to help them share;
- engaging with specialist support services and intervention;
- considering intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment;
- ensuring staff are trained to understand that a child harming another child could be a sign that the child is being abused themselves and that this would fall under the scope of this policy;
- all children access the NSPCC 'Stay Safe Speak Out' assembly annually between Years 1 and 6, in addition to covering the NSPCC Pants Rule between Nursery and Year 6 annually. It is covered in EYFS on a termly basis; and
- all children accessing 'online safety, including cyber bullying' lessons, during the autumn 1st half term as well as thereafter at the start of each half term.

8.2 Tackling sexualised comments

The school recognises that some children will sometimes negatively affect the learning and wellbeing of others; this will not always fall under the category of abuse and their behaviour will normally be dealt with under the school's behaviour policy. However, occasionally, allegations may be made against children by others in the school which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Such abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". The school recognises the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter," or "boys being boys," or "girls being girls" for example, can lead to a culture of unacceptable behaviours, an unsafe environment for children and in the worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

8.3 Handling allegations

When an allegation is made by a child against another child, if there is a safeguarding concern:

- a member of the DSL team must be informed;
- a factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances;
- the DSL should record all decision making on the 'Anti-Bullying' proforma;
- the DSL should consider whether the complaint raises a safeguarding concern with respect to either child;
- the DSL may contact the local authority Children's Services to discuss the case;
- the DSL will follow through with the outcomes of the discussion and make a social services referral where appropriate;
- parents/carers of both children should be informed - any inability to make contact should not delay a referral being made or further action to safeguard the child being taken;
- the DSL will make a record of the concern, the discussion and any outcome and keep a copy of this documentation in both children's files on the school's online safeguarding reporting platform;
- in situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a behaviour support plan;
- the school will take appropriate measures working with parents/carers and professionals to support both the victim and alleged perpetrator; and
- the school will allocate a different member of the safeguarding team to each child and their family, who will liaise with external agencies.

If the allegation indicates that a potential criminal offence has taken place, the following guidance should be followed:

- The police should be contacted at the earliest opportunity. Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual consequences procedures.
- When one child makes allegations of a criminal nature against another child, both sets of parents/carers should be contacted but such action must not delay the due process of reporting such allegations and must be considered appropriate by the DSL.

8.4 False or malicious allegations

There is recognition that there may be occasions when allegations made by one child against another are malicious. However, in the first instance, the school should prioritise the needs of the person making the allegation. Children's Services and the police will have their own thresholds to decide whether further action is required and the school should not do anything, beyond securing the immediate safety of both children, which may negatively affect the investigations of these agencies. If it is later proven that the allegation made by one child against another is false and malicious, the school will invoke its Behaviour Policy. Records will be reviewed regularly so that the potential for concerning, problematic or inappropriate behaviour can be addressed. All concerns, discussions and decisions made, and the reasons for those decisions should be recorded on the school's safeguarding reporting platform. In instances of cyberbullying, as with all instances of bullying, the school will deal with this in accordance with the anti-bullying policy. Where incidents require the searching of phone content; this will be done in line with Searching, Screening and Confiscation (2022, [click here](#)). The search of the phone should be carried out by a DSL only and with the cooperation and consent of the child where possible. If the child does not give consent the DSL can carry out the search if there is good reason to believe it contains information that:

- poses a risk to staff or students; and/or
- contains evidence in relation to an offence.

Two members of staff will always be present during the search with a parent/carer of the child's phone (where possible). Appropriate agencies such as the police and/or Children's Services/MASH will be informed if the DSL conducting the search suspects they may find indecent images of a child; they will follow the guidance set out in section 4. Section 25 in Part A details how 'safeguarding separation' will be applied when managing a serious incident which requires a child to be removed from school.

9. Staff and governor training

9.1 All staff, including contractors

All staff members will undertake safeguarding and child protection training at induction or annually (as appropriate), including whistleblowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three statutory safeguarding partners. All staff will have annual training on the government's anti-radicalisation strategy 'Prevent', to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates (for example, through emails and staff meetings) as required. Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training. Volunteers will receive appropriate safeguarding information/training.

9.2 DSL and DDSLs

The DSL and DDSLs will undertake child protection and safeguarding training to a Level 3 standard at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs or taking time to read and digest safeguarding developments). They will also undertake a suite of other training linked to safeguarding issues to broaden and extend their understanding, skill and knowledge. Members of the DSL team are also trained in Mental Health First Aid and will continue to deliver relevant training sessions to staff and parents/carers.

9.3 Governors

All governors receive annual training about safeguarding from opportunities organised by the Trust and by members of the safeguarding team at a local level, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose. The governing board will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation. The local governing body has appointed a link governor, to monitor the effectiveness of this policy in conjunction with the full governing board. The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate. All governors will read the latest version of the Department for Education's statutory guidance 'Keeping children safe in education'. Proof that they have the document will be obtained via signature and stored in their personal file. The Trust will continue to provide yearly safeguarding training for all governors.

10. Opportunities to teach about safeguarding

Hermitage Primary School has an ethos of respect and a culture that values, involves and listens to children. The school supports children in a myriad of ways and for many different reasons. The school helps children to understand what is and is not acceptable behaviour towards them and how to speak up if they have worries. Children are encouraged to speak up about concerns they may have for their peers. Children are taught about the issues linked to sexting at an age-appropriate level ('keeping our private parts private', NSPCC PANTS programme for example), as part of the school's relationships and sex education (RSE) and online safety sessions. Children are not taught specifically about sexting (for age-appropriate reasons) but parents/carers are encouraged via the regular safeguarding and wellbeing updates to ensure that their children are using the internet and mobile phones safely. The Department has produced a one-stop page for teachers on GOV.UK ([click here](#)). Safeguarding information and online safety advice is shared appropriately with children as part of the curriculum and during specific group sessions, where necessary – curriculum-led PSHE and RSE sessions, road safety programmes, and swimming lessons (including water safety) for example. This includes teacher-training modules on the RSE topics and non-statutory implementation guidance. Children's experience of Jigsaw sessions (the school's PSHE and RSE curriculum) is fun, engaging and memorable. Children have discussions and watch short films about healthy eating, legal and illegal drugs and their effects, the body and how it works, friendships and their influence, and how choices and behaviours can affect children's health and education outcomes. Interventions include challenging social norms, misperceptions of peers' engagement with risky behaviour, to engender more positive behaviours. Throughout the year the school curriculum is enhanced through themed weeks and special events. These include:

- Children's Mental Health Week and World Mental Health Day, Empathy Day
- Anti-bullying Week
- Equality and Diversity Week
- Targeted assemblies (from within the school as well as via external agencies)
- Workshops with the local MET police
- Online safety
- Workshops from outside agencies with specific focuses
- Junior Citizenship
- Road safety
- Bike-ability

11. Children with special education needs and/or disabilities (SEND)

All staff are made aware of children with SEND and the effect that this might have on a child's identity, belonging and ability to share their voice and experiences. The school recognises that children with SEND can face additional safeguarding challenges and barriers. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

The school offers extra pastoral support for children with SEND. This includes:

- 1:1 and group sessions with SEND TAs
- Additional training via SENCo for children and parents/carers (strategies to support social communication, speech and language, cognition and social and emotional well-being). The SENCo works closely with families of children with SEND, ensuring the support is collaborative and consistent.
- Individual care plans co-produced by the SENCo, class teachers and parents/carers
- Specific and personalised interventions
- SEND parent/carer support and individual meetings with specialists such as the educational psychologist or the speech and language therapist, as well as 'information sharing' drop-in sessions with professionals from specialist agencies

12. Looked-after children

The school ensures that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, the school will ensure that appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements. The DSL has details of children's social workers and relevant virtual school heads (see Section 1) stored within the school's safeguarding reporting platform. Vulnerable students are regularly discussed at weekly DSL meetings within the school. The designated teacher is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role. As part of their role, the designated teacher will:

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

13. Mental health – a whole school approach

All staff are aware that 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. Only mental health first aid trained staff make an assessment of a mental health concern but all staff are well placed to observe children and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one. The school is aware that there are significant influences that can negatively affect a child's mental health and has a clear set of whole-school approaches that support children, all of which are detailed in the school's behaviour policy. Where concerns arise, the school follows the ALGEE model of support as displayed on the following page.

ALGEE model of support:



- A**pproach, assess and assist with any crisis
- L**isten non-judgmentally
- G**ive support and information
- E**ncourage appropriate professional help
- E**ncourage other supports

More information can be found in the Department for Education's guidance: 'Mental health and behaviour in schools' regarding routes to escalate, as well as referral and accountability systems ([click here](#)). Advice and support options for staff are also available within the staff wellbeing policy as well as through the fortnightly wellbeing and safeguarding updates (via the school newsletter) for staff and parents/carers. The Trust's wellbeing and safeguarding information sharing platform also holds key information.

14. Children absent from school, children missing from education

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

- are at risk of harm or neglect;
- are at risk of forced marriage or FGM;
- come from Gypsy, Roma, or Traveller families;
- come from the families of service personnel;
- go missing or run away from home or care;
- are supervised by the youth justice system;
- cease to attend school; and/or
- come from new migrant families.

The admissions and attendance office lead at school works closely with the deputy headteacher to ensure that multiple attendance and monitoring tasks are applied effectively and that no child is left to go under the radar when it comes to good attendance. The school will inform the LBH attendance team of any child who fails to attend school regularly or has been absent, without notification from the family for a continuous period of 10 school days. For children who are on the school's vulnerable pupil's register, contact with the social worker or other relevant professional is made within 24 hours of any unauthorised absence. Attendance and punctuality for all children are monitored daily (further details of this monitoring as well as subsequent actions are available in the school's attendance policy). Only once the school has confirmation from the local authority's attendance team that it is safe to remove a child from the school roll, or the school has confirmation that they have started at a new school, will the child be removed from the school roll. Staff are regularly trained in the 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 missing, such as travelling to conflict zones, FGM and forced marriage. If a staff member suspects that a child is suffering from harm or neglect, the school will follow local child protection procedures, including with respect to making reasonable enquiries. Section 17 in Part A offers detailed information about various groups of children who are at increased risk and/or are more vulnerable.

15. Online safety, mobile phones and social media

15.1 Overview

The school recognises that the use of technology presents challenges and risks to children and adults both inside and outside of school. The school has an online safety policy which outlines procedures and strategies on how children are kept safe in school and outside of the school environment. Parents/carers

and staff receive fortnightly safeguarding and wellbeing updates via the ~~school~~ Wednesday Wellbeing and Safeguarding Newsletter, equipping them with up-to-date knowledge and skills linked to e-safety, wellbeing and safeguarding. E-safety lessons take place in September for all year groups, then each half term. They cover a range of social media concerns and scenarios that allow children to make good decisions whilst online. Any concerns regarding online behaviour are reported to the DSL and dealt with in reference to Section 22 in Part A of this policy.

15.2 Mobile phones

Parents/carers of children in Year 6 are required to complete a signed form for bringing in a mobile phone to school. Upon arrival at school, phones are stored in the teacher's cupboard only to be returned at the end of the school day. Mobile phones are not to be used by adults in an environment where there are children. Staff can use their phones in the staffroom for example, but not in the classroom.

15.3 Protecting children from online harm

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The school's approach to online safety aims to protect and educate students, parents/carers and staff in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate, by involving parents/carers and students in increasing awareness of potential dangers. These include dangers to mental health in children. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content** involves children being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **contact** involves children being subjected to harmful online interaction with other users; for example: 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** involves personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce** involves risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Consideration of the '4 Cs' form the basis of the school's approach to online safety. The following resources are used, where appropriate, to develop teaching opportunities about current safeguarding issues in school:

- DfE advice for schools: teaching online safety in schools:
- UK Council for Internet Safety (UKCIS) guidance: Education for a connected world;
- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people;
- The UKCIS external visitors guidance – helping schools to ensure the maximum impact of any online safety sessions delivered by external visitors;
- National Crime Agency's CEOP education programme: Thinkuknow;
- National Online Safety hello@nationalonlinesafety.com

School staff can also refer to the social media policy for more guidance on online safeguarding and expected behaviours. All concerns about online behaviour are logged on the school's safeguarding reporting platform and discussed by the DSL team.

15.4 Filtering and monitoring

The deputy headteacher (DSL), as well as the school's IT provider, have overall responsibility for monitoring the effectiveness of these two safeguarding systems. A record of monitored online activity is accessed by the DSL at school, who completes regular checks by utilising tools shared via the Trust's DSL information-sharing platform. Reports are then disseminated where appropriate with the wider school

leadership. Once attempted breaches have been identified, relevant school staff are made aware alongside additional actions of support. The criteria for inappropriate and harmful content is maintained by the IT provider. The DSL completes weekly checks on reports from the IT provider, to make sure that students are kept safe from particular content, e.g. pornography, hate crime. The IT provider checks that filtering systems are up to date and monitors for appropriate words for example. Tests and monitoring reports from the IT provider are accessed weekly by the DSL as evidence of the filtering systems working effectively. Staff also receive regular updates as discussed in earlier sections as well as complete annual online safety training via the National College. Section 22.4 in Part A discusses the trust's safeguarding response and mitigation of risks linked to the use of artificial intelligence (AI) and educational technology (EdTech), as well as information security.

16. Safer recruitment

The school has robust and clear processes to ensure that all staff and volunteers are suitable and safe to work with children. These processes are detailed in the school's safer recruitment policy. ID documents are held within a staff/volunteer's file. Hard copies of DBS certificates are not taken; however, a note of the hard copy being seen is recorded within the staff file. At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, *'Keeping children safe in education'*, and will be in line with local safeguarding procedures. There will always be a governor who has had safer recruitment training when recruiting a headteacher.

17. Visitors to school site

All visitors sign in using the electronic system at reception. During this signing-in process, visitors are made aware of safeguarding procedures as well as fire procedures. Photos of the safeguarding team are shown on the school's digital signage system and around the school building for all to see. All fully vetted visitors (volunteers, contractors, peripatetic teachers, school health, children's services etc) who have had their DBS and ID checks verified by the school receive a yellow lanyard. Where a visitor is not vetted, they receive a red lanyard and are then fully supervised by a staff member throughout the duration of their visit to the school. Parent/carer volunteers and external volunteers to school are fully inducted via the procedures outlined in the school's volunteer policy. Photos of all new volunteers are shared with all staff via email by the DSL. Where the school plans workshops by external providers, they are advised to bring a DBS certificate dated within the last three years, as well as appropriate ID ahead of any visit to school. All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. 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 children or staff.

18. Use of premises by outside organisations

The school will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be an enhanced DBS check with barred list information for contractors engaging in regulated activity. The school will obtain the DBS check for self-employed contractors. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. The school will check the identity of all contractors and their staff on arrival at the school. For self-employed contractors such as music teachers or sports coaches, the school ensures that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When the school decides that an individual falls outside of the scope of these regulations and does not carry out such checks, a record of an assessment is retained. This will include an evaluation of any risks and control measures put in place and any advice sought. Where a letting/club takes place at the same time as children may reasonably be expected to be on site, the hirer will be required to provide evidence of a valid DBS check. Outside of normal school hours, compliance with the relevant safeguarding procedures is the sole responsibility of the hirer. Further details can be found in the school's letting agreement.

19. Safeguarding monitoring arrangements

The Trust's safeguarding lead visits the school to provide supervision at least once a half-term. Detailed information about the supervision process can be found in Part A, section 6.1.6. The school completes a self-audit every term via the Trust's compliance safeguarding checklist. This, along with a school safeguarding action plan is shared with the school's safeguarding link governor upon their termly visits. The safeguarding link governor shares this information with the rest of the LGB as a standing item during every meeting. The school's safeguarding link governor reviews processes and key safeguarding data which includes monitoring the single central record checking log (check 3), which is completed by the headteacher (check 1) and DSL (check 2). This visit will include meetings with students and staff as well as a safeguarding walk around the school site. The Trust's safeguarding and child protection policy, Parts A and B, will be reviewed annually. The school's success criteria of this policy includes the following:

1. Staff report that they feel confident that they know what to do, or who to contact when they have concerns about children or their families (staff voice is collected via Google Forms as well as staff questionnaires).
2. Information on pastoral concern forms shows that they are being completed appropriately and that incidents are being appropriately followed up. This includes audits of casework (individual case files and school monitoring records).
3. Staff say that they believe that safeguarding procedures set out in the policy are being consistently followed throughout the school.
4. The content of the policy remains up to date with reference to Hillingdon local safeguarding procedures and all other national legislation.

20. Links to other school-based policies

This policy needs to be read in conjunction with other policies, in particular:

- *Attendance policy*
- *Behaviour policy*
- *Exclusion policy*
- *Bereavement policy and suicide plan*
- *Dealing with allegations against staff policy*
- *Educational visits policy*
- *SEND policy*
- *Safer recruitment policy*
- *Volunteer policy*
- *First aid policy*
- *Health and safety policy*
- *Supporting pupils with medical needs policy*
- *Online safety policy*
- *PSHE/RSE policy*
- *Remote learning policy*
- *Whistleblowing policy*

Approval / revision history

Revision date	By	Summary of Changes Made
July 2025	LGB	Updated for September 2025 KCSIE
July 2024	LGB	Updated for September 2024 KCSIE
July 2023	LGB	Updated for September 2023 KCSIE
July 2022	LGB	Updated for September 2022 KCSIE
September 2021	LGB	Update for September 2021 KCSIE
September 2020	LGB	Update for September 2020 KCSIE