



# Safeguarding & Child Protection Policy

Last Reviewed:	August 2025
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Approved by:	Trust Board 04.11.25
Trustee Minute No:	0485

The policy is provided to all staff at the beginning of the academic year and/or at induction. In addition, all staff are provided with Part 1 of the statutory guidance [Keeping Children Safe in Education \(2025\)](#)

This policy will be reviewed in full by the Board of Trustees on an annual basis and updated in line with DfE statutory guidance and best practice principles.

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Academy Trust Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

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Each of us has individual responsibility for safeguarding and promoting the welfare of children. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent Academy's to safeguard and promote the welfare of pupils at the Academy.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- Statutory guidance on the Prevent duty, which explains Academy's duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR).
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Governors and

Headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our Academy to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

KEY CONTACTS		
Role	Name	Contact details
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## 1. PURPOSE & AIMS

The purpose of this Safeguarding Policy is to ensure every child who is a registered pupil within our Trust is safe and protected from harm.

### 1.1 Safeguarding and promoting the welfare of children means:

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

This means we will always work to:

- Create and maintain a safe learning environment for children.
- Protect children at our academies from maltreatment from adults or from their peers.
- Prevent impairment of our children's mental and physical health or development.
- Promote the positive health and wellbeing of all our children, identifying any children who may benefit from early help.
- Ensure **all** staff take appropriate action where there are child welfare concerns.
- Ensure that children at our academy grow up in circumstances consistent with the provision of safe and effective care.
- Ensure that the views of children are always taken into account and decisions taken are always in the best interest of the child.

### 1.2 Definitions

**Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

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

**Children** includes everyone under the age of 18.

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

- The local authority (LA).
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA.
- The Chief Officer of police for a police area in the LA area.

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

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

This policy applies to all children, parents, staff, governors, volunteers and visitors and gives clear direction to all about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at our academy. (For brevity, the term 'parent' is used to refer to anyone with parental responsibility in this policy).

Our Trust fully recognises the contribution it can make to protect children from harm and to support and promote children's welfare. The elements of our policy are prevention, protection and support.

## 2. OUR ETHOS

The child's welfare is of paramount importance. QEGSMAT (the Trust) will establish and maintain an ethos where children feel secure, are encouraged to talk, are listened to and are safe. Children in our Trust will be able to talk freely to any member of staff if they are worried or concerned about something.

Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that staff in our Trust play a particularly important role as they are in a position to identify concerns and provide early help for children to prevent concerns from escalating. **All staff are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned.**

All staff will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child and we will not keep secrets.

Every child will know what the adult will have to do with any information they have chosen to disclose.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the Designated Safeguarding Lead (DSL).

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. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken to refer to a DSL.

All staff will be supported and prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life in order to reduce harm, prevent further issues and develop resilience. Staff should be particularly alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Unexplainable and/or persistent absences from education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Children with special educational needs or disabilities or certain health conditions can face additional safeguarding challenges. All staff will be aware that these children can be more vulnerable to abuse and are disproportionately impacted by behaviours such as bullying and child-on-child abuse. Particular care will be taken to ensure that they feel supported and listened to. For further support on children with special



educational needs, Academies can use the Special Educational Needs and Disabilities Information and Support Services (SENDIASS).

Throughout our curriculum, we provide activities and opportunities for children to develop the skills they need to identify risks and stay safe. Children are supported to develop resilience, independence and essential life skills. This includes:

- A full programme of RSHE which is age and context appropriate.
- Drug & sex and relationship education programmes.
- E-safety education – keeping safe on-line at Academy or at home.
- Nurture group provision for identified vulnerable children as part of our early help process.

At all times we will work in partnership and endeavour to establish effective working relationships with parents and colleagues from other agencies in line with *Working Together to Safeguard Children*.

### **3. CONTEXTUAL SAFEGUARDING**

This is how we approach safeguarding issues specifically in our localities that pose the biggest risk to our pupils and their families. Each of our academies include their own contextual information within their individual policies. We recognise that the different relationships children and young people form in their neighbourhoods, Academy and online can feature violence and abuse. Regular updates on contextual safeguarding are provided to all staff in response to emerging trends, feedback from local serious case reviews and information provided by external partners.

All staff will receive Level 1 Safeguarding Awareness training on induction and on a regular basis, followed up by in-Academy training from the DSL to cover issues and concerns pertinent to the individual academy and actions taken to address and mitigate risk.

### **4. ROLES AND RESPONSIBILITIES**

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, local governors and Trustees across our Trust and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended Academy and off-site activities.

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

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

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

#### **4.1 All staff**

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).

All staff will be aware of:

- Our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the Staff Code of Conduct, the role and identity of the DSL and deputies, the Behaviour Policy, and the Online Safety Policy and the safeguarding response to children who have unexplainable and/or persistent absences from education.
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.

- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at the Academy and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children.
- That a child and their family may be experiencing multiple needs at the same time.
- What to look for to identify children who need help or protection.

#### **4.2 The designated safeguarding lead (DSL)**

The DSL is a member of the senior leadership team. This includes online safety and understanding our filtering and monitoring processes on Academy devices and Academy networks to keep pupils safe online.

During term time, the DSL will be available during Academy hours for staff to discuss any safeguarding concerns.

When the DSL is absent, the deputy will act as cover.

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Have a good understanding of the filtering and monitoring systems and processes.

The DSL will also:

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the Academy's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

The full responsibilities of the DSL and deputies are set out in their job description.

### 4.3 The Board of Trustees

The Board of Trustees is accountable for ensuring the effectiveness of this policy and our compliance with it. Trustees should undertake safeguarding training that equips them with the knowledge to provide strategic challenge to test and assure themselves that the academy safeguarding policies and procedures are robust and effective. Although our Board of Trustees and Governing Bodies take collective responsibility to safeguard and promote the welfare of our pupils, we also have a named Trustee and Governor who champions safeguarding within the Academy and across the Trust.

The Board will:

- Facilitate a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our Trust's local multi-agency safeguarding arrangements.
- Appoint a Trustee to monitor the effectiveness of this policy.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- Ensure that the Academy has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the Academy in meeting these standards.
- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
  - Online safety is a running and interrelated theme within the whole-trust approach to safeguarding and related policies.
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
  - The Trust has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the Academy roll):

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

#### **4.4 Local governing bodies**

Governors on local governing bodies will review the Academy specific elements of the policy after the Trust level policy has been reviewed and approved. The Trust will ensure that the LGB have undertaken safeguarding training that equips them with the knowledge to provide strategic challenge to test and assure themselves that the academy safeguarding policies and procedures are robust and effective.

They will also monitor the implementation of the policy.

Will appoint a member of each local governing body to act as the governor responsible for safeguarding, to liaise with the Academy DSL on local safeguarding issues and report to the local governing body.

Safeguarding responsibilities include:

- Appointing a Safeguarding Governor.
- Ensuring the academy has appointed a designated member of staff to support Looked After Children.
- Monitoring the implementation of the policy.
- Receive outcomes of safeguarding audits and reviews and monitor that any areas identified for improvement are addressed swiftly.

#### **4.5 The CEO**

The CEO is responsible for the implementation of this policy, including identifying a member of the senior leadership team to be the Senior DSL.

- Identifying an alternate member of staff to act as the DSL for safeguarding in his/her absence to ensure there is always cover for the role.
- Ensuring that the DSL has appropriate resources, time and training in order to fulfil their role effectively.
- Ensuring that all staff know and follow policies and procedures regarding safeguarding.
- Ensuring that a single central record (SCR) of all staff and volunteers is maintained in line with statutory guidelines.
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed Whistleblowing Policy and procedures.
- Ensuring that all staff are sensitive to signs that may indicate possible safeguarding concerns. This could include, for example, poor or irregular attendance, persistent lateness, children who have unexplainable and/or persistent absences from

education, risk of being drawn in to anti-social or criminal behaviour, mental health concerns, forced marriage or female genital mutilation.

- Ensuring that visitors to the Trust provide formal identification on arrival, sign in at reception and are supervised whilst on the premises as appropriate.
- Liaise with the LADO in the event of an allegation of abuse being made against a member of staff.
- Represent the Trust at strategy meetings involving a member of staff, volunteer or regular visitor.
- Liaise with police in cases where a crime may have, or has been, committed.
- Ensuring that People & Culture colleagues inform the Disclosure and Barring Service in cases where a member of staff is dismissed or left their employment due to risk/harm to a child.
- Where an allegation is made against the Headteacher, the Director/Safeguarding Lead or CEO will be informed and work together with the LADO.
- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction.
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the Academy and via the Academy website.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

For early years providers and primary Academy's:

- Ensuring the relevant staffing ratios are met, where applicable, including those for pediatric first aid as stated in EYFS statutory guidance.

For early years providers in your Trust, add:

- Making sure each child in EYFS is assigned a key person.
- Toileting and privacy, including balancing privacy with safeguarding and support needs during nappy changes and toileting.
- Overseeing the safe use of technology, mobile phones and cameras in the setting (see EYFS and Esafety Policy for more details).
- Safer eating, including how staff with a valid PFA certificate must be present when children are eating, and getting information on dietary requirements (including preferences, allergies and intolerances and special health requirements).
- Ensuring that those with early years are following safeguarding processes stated in EYFS statutory guidance.

## **5. TRAINING & INDUCTION**

### **5.1 All staff**

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they

understand the Academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

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

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

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

Volunteers will receive appropriate training, if applicable.

## **5.2 The DSL and Deputies**

The DSL and Deputies will undertake child protection and safeguarding training at least every two years.

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

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

## **5.3 Trustees and Local Governors**

All Trustees and Local Governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

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

## **5.4 Recruitment – interview panels**

At least one person conducting any interview for any post at the Academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of

Keeping Children Safe in Education, EYFS statutory framework and will be in line with local safeguarding procedures.

See our Safer Recruitment Policy.

For schools with early years:

### **5.5 Staff who have contact with pupils and families**

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

## **6. PROCEDURES FOR MANAGING CONCERNS**

The Trust adheres to child protection guidance and procedures, both from the DfE and those that have been agreed locally. Records are maintained electronically on MyConcern or CPOMS, the Trust's online system for recording and tracking safeguarding concerns/records.

All staff should be aware that abuse, neglect 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 and volunteers have a duty to report any concerns that they have and pass the information on in accordance with the procedures outlined in this policy. A referral may be justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. On-going concerns should be added to the child's chronology, as appropriate. A reliance on memory without accurate and up-to-date records of concern could lead to a failure to protect.

Safeguarding incidents and/or behaviours can be associated with factors outside the Trust. All staff, but especially the DSLs, should be considering the context within which such incidents occur. This is known as contextual safeguarding, which simply means 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.

The DSL is first point of contact for concerns and queries regarding any safeguarding concern in our Trust. Any member of staff or visitor to the Trust who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL. We have a number of trained DSLs in our academies. In their absence, the matter should be brought to the attention of a senior member of staff.

All concerns about a child should be reported **without delay** and recorded electronically. CPOMS will send an email notification to DSLs and any other relevant



member of staff for that child. It may also be pertinent to bring to the attention of the class teacher/tutor for them to confirm knowledge of the concern. Evidence of injuries, if appropriate, should be recorded on a separate body map.

Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children's Services as required. All information and actions taken, including the reasons for any decisions made and follow-up actions, will be fully documented.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Services straight away by telephone and then followed up with a fully completed referral form following Children's Services procedures. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the CEO. Concerns should always lead to help for the child at some point.

Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the police if:

- The situation is an emergency and the DSL and senior leaders are all unavailable;
- They are convinced that a direct report is the only way to ensure the pupil's safety.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the CEO. If any member of staff does not feel the situation has been addressed appropriately at this point they should contact Children's Services directly with their concerns.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Trust's safeguarding regime and such concerns will be taken seriously by the senior leadership team.

If the Trust receives an allegation relating to an incident where an individual or organisation was using Trust premises for running an activity for children, staff should follow safeguarding policies and procedures and inform the LADO, as you would with any safeguarding allegation.

### **6.1 If a child is suffering or likely to suffer harm, or in immediate danger**

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

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

### **6.2 If a child makes a disclosure to you**

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

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

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

### **6.3 If you discover that FGM has taken place or a pupil is at risk of FGM**

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

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

**Any teacher** who either:

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

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

Unless they have been specifically told not to 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 **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

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

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

#### **6.4 If you have concerns about extremism**

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken.

Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate. Inform the DSL or deputy as soon as practically possible after the referral.

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

The DfE also has a dedicated telephone helpline, 020 7340 7264, which staff can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto: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.

#### **6.5 Allegations of abuse made against other pupils**

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

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our Behaviour Policy, but this Child Protection and Safeguarding Policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

See Appendix 4 for more information about child-on-child abuse.

### **Procedures for dealing with allegations of child-on-child abuse**

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

- You must record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering Academy transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

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

### **Creating a supportive environment in the Academy and minimising the risk of child-on-child abuse**

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse.

- Ensure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra-familial harm and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
  - That even if there are no reports of child-on-child abuse in an Academy, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”.
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to.
    - A friend may make a report.
    - A member of staff may overhear a conversation.
    - A child’s behaviour might indicate that something is wrong.
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
  - That they should speak to the DSL if they have any concerns.
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

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

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

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this.

- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

## **6.6 Sharing of nudes and semi-nudes ('sexting')**

### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately. When an incident might involve an indecent image of a child and/or video, the member of staff can confiscate the device, avoid looking at the device and refer the incident to the DSL (or deputy) as the most appropriate person to advise on the Academy's response.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it. (If you have already viewed the imagery by accident, you must report this to the DSL).
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

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

### **Initial review meeting**

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

- Whether there is an immediate risk to pupil(s).
- If a referral needs to be made to the police and/or 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 pupils involved which would influence risk assessment.
- If there is a need to contact another Academy, college, setting or individual.
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or 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.
- 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 pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to 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 pupil at risk of harm.

#### **Referring to the police**

If it is necessary to refer an incident to the police.

#### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

#### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

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

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

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

### **6.7 Reporting systems for our pupils**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

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

To achieve this, we will:

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

## **7. RECORDS AND INFORMATION SHARING**

If staff are concerned about the welfare or safety of any child at our Academies, they will pass this on to the DSL without delay, who would then record the concern electronically on MyConcern or CPOMS. They should ensure that the concern records all details fully along with their name and date. Any concerns should be passed to the DSL without delay.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care



or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the Academy.

If a child for whom the Academy has, or has had, safeguarding concerns moves to another Academy, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. Academies will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving Academy and/or evidence of recorded delivery.

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

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

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

Whilst the General Data Protection Regulation (GDPR) places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

## **8. WORKING WITH PARENTS & CARERS**

This Trust is committed to working in partnership with parents/family/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

A copy of our Safeguarding and Child Protection Policy is posted on the Trust website and will be provided to parents on request. Parents will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to Children's Services.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a child from harm.

We will seek to share with parents any concerns we may have about their child *unless* to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the Academy has about a child will not prevent the DSL making a referral to Children's Services in those circumstances where it is appropriate to do so.

In order to keep children safe and provide appropriate care for them, the Trust requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives;
- Full names and contact details of all persons with parental responsibility (if different from above);
- Emergency contact details (if different from above);
- Full details of any other adult authorised by the parent to collect young children.

Academies will retain this information on the pupil file. Academies will only share information about children with adults who have parental responsibility for the child or where a parent has given permission and the academy has been supplied with the adult's full details in writing.

## **9. PUPILS WITH SPECIAL EDUCATIONAL NEEDS, DISABILITIES OR HEALTH ISSUES**

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

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

We offer extra pastoral support for these pupils.

## **10. PUPILS WITH A SOCIAL WORKER**

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to

further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

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

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

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

## **11. LOOKED-AFTER AND PREVIOUSLY LOOKED-AFTER CHILDREN**

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

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

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

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

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
- Work with virtual Academy 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.

## **12. PUPILS WHO ARE LESBIAN, GAY, BISEXUAL OR GENDER QUESTIONING**

The section of KCSIE 2025 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as a complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

### **13 CHILD PROTECTION REVIEW CONFERENCES**

Children's Services will convene a Child Protection Review (CPR) conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A CPR will take place once a child has been made the subject of a Child Protection Plan in order to monitor the safety of the child and the required reduction in risk.

Staff members may be asked to attend a CPR or core group meetings on behalf of our academies in respect of individual children. The DSL will usually attend all CPRs. In any event, the person attending will need to have as much relevant up to date information about the child as possible; any member of staff may be required to contribute to this process.

All reports for CPRs will be prepared in advance wherever possible. The information contained in the report will be shared at the conference as appropriate and will include information relating to the child's physical, emotional and intellectual development, the child's presentation at school and any concerns that we have. In order to complete such reports, all relevant information will be sought from staff working with the child in that Academy.

Clearly CPRs can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose child has been referred to Children's Services or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children and our aim is to achieve this in partnership with our parents.

#### **14. SAFER RECRUITMENT – see also Safer Recruitment Policy**

We will ensure that the CEO and at least one member of the Board of Trustees have completed appropriate safer recruitment training. At all times the CEO and Board of Trustees will ensure that safer recruitment practices are followed in accordance with DfE requirements.

We will use the recruitment and selection process to deter and reject unsuitable candidates. We require evidence of original academic certificates. We do not accept testimonials and take up references prior to interview. We will question the contents of application forms if we are unclear about them, we will undertake Disclosure and Barring Service checks and use any other means of ensuring we are recruiting and selecting the most suitable people to work with our children. We will inform shortlisted candidates that we may conduct an online search as part of due diligence checks in the recruitment process.

We will maintain a Single Central Register of all safer recruitment checks carried out in line with statutory requirements.

#### **15. SAFER WORKING PRACTICE**

All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so. This includes supply staff and volunteers.

All staff will be expected to know our **Safeguarding and Child Protection Policy, Staff Behaviour Policy** and **Use of Reasonable Force Policy** and carry out their duties in accordance with this advice. There will be occasions when some form of physical contact is inevitable, for example if a child has an accident, is hurt or is in a situation of danger to themselves or others around them. However, at all times the agreed approach for safe restraint will be adhered to. A list of staff that have accessed positive intervention training will be retained.

If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts, who they are with and for how long. Doors should be left open when appropriate.

It is accepted that staff or volunteers will have mobile phones but these should be stored securely and accessed only during breaks, except in cases of emergency. Staff or volunteers should not use their personal mobile devices to photograph children. See **Acceptable Use of IT Policy**.

Photographs are used to validate children experiences, achievements and to evidence progress but these should only be taken on approved Trust devices and only stored on secure servers. Parental permission for photographs forms part of the admission procedures. Parents are reminded at all Academy events that photographs are for

their own and their family's memories and asked not to upload photographs that may include other children on to unsecured social media platforms.

Primary aged children are not permitted to bring mobile devices into the Academy. If they need to have one due to parental after school care arrangements, then these should be stored securely at the Academy office during the Academy day.

#### **16. WHISTLEBLOWING – see Whistleblowing Policy**

All staff should be aware of their duty to raise concerns they may have regarding the attitude or actions of colleagues, identification of unsafe practice, non-adherence to policy and processes or other incidence where they perceive that the Academy is not fulfilling its duty to safeguard.

#### **17. MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS – see Allegations of Abuse Against Staff Policy**

Our aim is to provide a safe and supportive environment which secures the wellbeing and positive outcomes for all children in our Trust. We recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children, but also that some allegations may be unfounded or malicious.

We will take all possible steps to safeguard our children and to ensure that the adults in our Trust are safe to work with children. We will ensure that local safeguarding partnership procedures and Part 4 of *KCSIE* are adhered to and will seek appropriate advice from the LADO. This guidance uses the following definitions of allegations that might indicate a person would pose a risk of harm if they:

- 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 would pose a risk of harm if they work regularly or closely with children.
- Behaved or may have behaved in a way that indicates that they may not be suitable to work with children

If an allegation is made or information is received about any adult who works in our Trust, including agency supply staff, that indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the CEO and/or the Trust DSL immediately. Should an allegation be made against the CEO, this will be reported to the Trust DSL/Board of Trustees. People & Culture should then be informed in order to provide further support and advice.

The Trust will seek advice from the LADO without delay. No one will undertake further investigations before receiving advice from the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns with the CEO or Trust DSL should contact People & Culture or the LADO directly.

The Trust has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our Academy, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or People & Culture.

The following definitions should be used when determining the outcome of allegation investigations:

- 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 cause harm to the person 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. The term, therefore, does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

The Trust acknowledges that it has a duty of care to its employees. We will take all possible actions to manage and minimise the stress inherent in the allegations process. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action. Decisions on whether a suspension is warranted must be discussed and confirmed with People & Culture and with final agreement of the CEO. Every effort will be made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. Further details are to be found in our appropriate People & Culture policy.

If an allegation is determined to be unsubstantiated or malicious, the DSL will consult with the LADO in order to determine whether this matter warrants further investigation from Children's Services as the child may be in need of support. The CEO should consider whether any disciplinary action is appropriate against the child who made it or whether police should be asked to consider if action might be appropriate, whether the person making the allegation is a pupil or not.

#### **18. PREVENT DUTY – extremism, radicalisation and terrorism**

Protecting children from the risk of radicalisation is part of our safeguarding duty to protect children from risk of harm. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Specific background factors may contribute to susceptibility which are often combined with particular influences such as family, friends or online. The CEO, and the Trust DSL and the Safeguarding Trustee will assess any susceptibility and put actions in place to reduce this. Risk assessment may include the use of Trust premises by external agencies, Anti

Bullying Policy and other issues specific to the Trust's profile, community and philosophy.

All staff receive Prevent training as part of their induction with regular updates on an ongoing basis.

Academies have a duty under section 26 of the Counterterrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn in to terrorism". [Revised Prevent duty guidance for England](#) All staff and volunteers should be alert to changes in children's behaviour which may indicate they are in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately. All such concerns will be recorded and reported to the DSL as per child protection procedures.

The DSL will make referrals to Channel Programme or direct to the police and seek their advice in concerns regarding radicalisation.

We recognise that the use of social media in particular has become a major factor in the radicalisation of children and young people. Specific firewall software is in place on our IT system to identify searches which may be deemed inappropriate and require further investigation.

## **19. ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY see Safety/Online Policy**

### **19.1 Online safety and the use of mobile technology**

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, the Trust aims to:

- Have robust processes in place (including filtering and monitoring) to ensure the online safety of pupils, staff, volunteers and Governors.
- Protect and educate the whole Academy community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole Academy community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

### **The four key categories of risk**

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or



young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as 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** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

**To meet our aims and address the risks above, we will:**

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology.
  - Keeping personal information private.
  - How to recognise unacceptable behaviour online.
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and their expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regard to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to the Academy for their own use but will limit such use to non-contact time when pupils are not present.
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Make all pupils, parents/carers, staff, volunteers and Governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in Academy, use of the Academy's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the four key categories of risk (described above) from the Academy's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our Academy community.
- Review the Child Protection and Safeguarding Policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For more details, please refer to our Staff Behaviour Policy.

### **19.2 Artificial intelligence (AI)**

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

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

QEGSMAT will treat any use of AI to access harmful content or bully pupils in line with this policy .

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the Trust.

<h2><b>20. MONITORING THE EFFECTIVENESS OF THIS POLICY See Safeguarding Quality Assurance Framework</b></h2>
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This policy will be monitored, and its effectiveness judged in a number of ways:

- This policy will be reviewed annually by the DSL and CEO. At every review, it will be approved by the full Board of Trustees and the locally set sections then reviewed by the Headteacher and local governing body.
- Updated and reviewed regularly, with the DSL working with the Trust.
- Feedback from parents.
- Annual safeguarding audit.
- Termly SCR and compliance audits.
- Regular reports to Trustees and Governors.

Robust safeguarding practices and procedures are key to supporting and safeguarding the children and young people that access services from QEGSMAT. Effective quality assurance measures are essential in ensuring the practices and procedures are fit for purpose.

Onsite assurance visits will be conducted in each Academy, at least once an academic year.

The Trust will provide effective and robust feedback to Academies that will support their ongoing evaluation and improvement work at a strategic level.

## **21. RELEVANT POLICIES**

To underpin the values and ethos of our Trust and our intent to ensure that children at our Academy are appropriately safeguarded the following Trust policies are also included under our safeguarding umbrella:

- Staff Behaviour and Code of Conduct Policy
- Disciplinary, Capability, Grievance and Appeals
- Allegations of Abuse Against Staff
- Whistleblowing
- Acceptable Use of IT
- Health and Safety
- Special Education Needs & Disabilities
- Supporting Pupils with Medical Conditions
- Offsite visits
- Children Missing from Education
- Use of Reasonable Force
- EYFS Policy

## **22. APPENDICIES**

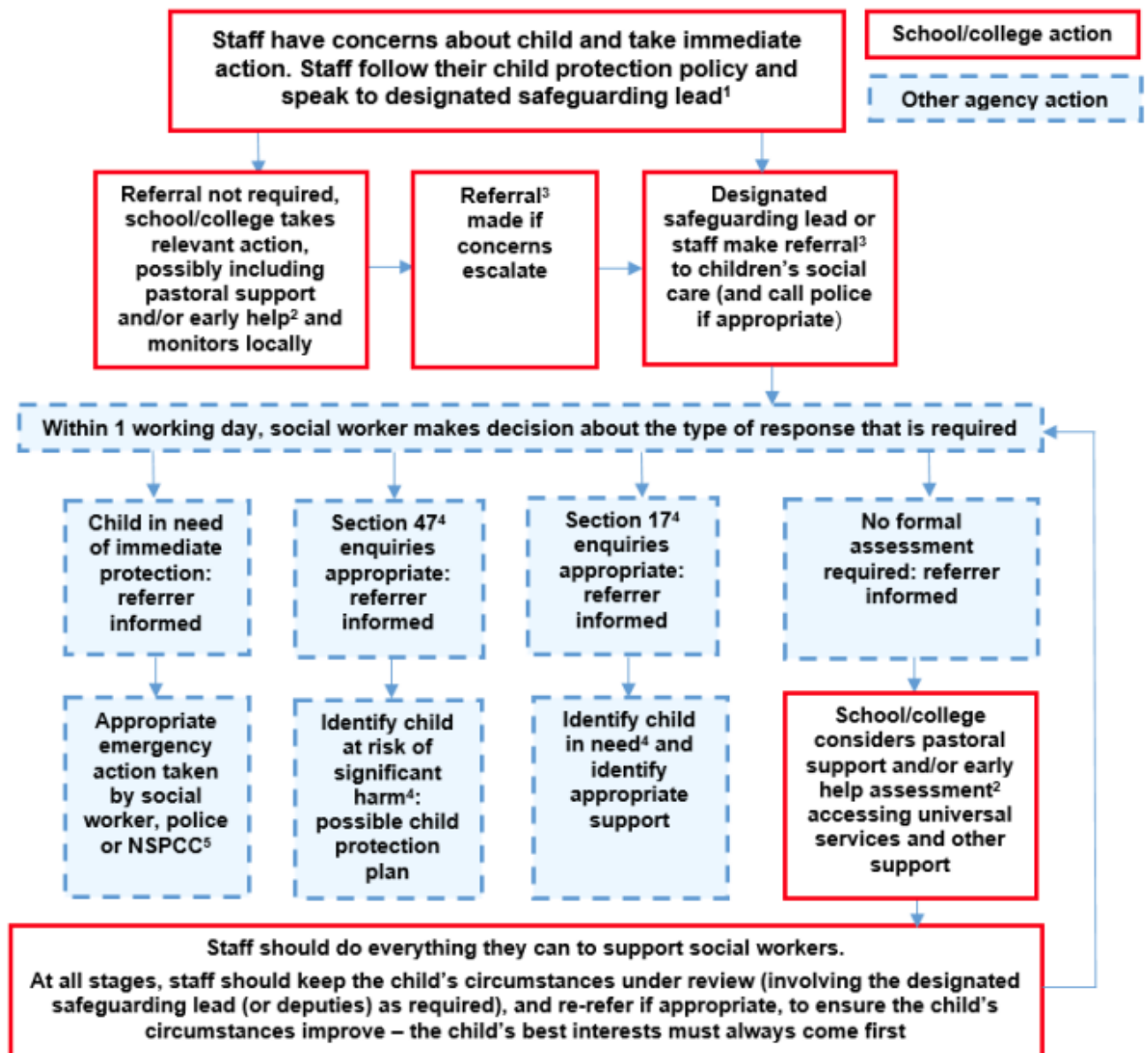
Appendix 1: Concerns about a child flow chart

Appendix 2 :Safeguarding and child protections risks – to be read with Annex A of [KCSIE 2025](#) (Pages 136-141)

Appendix 3:Annex B further specific safeguarding information

## APPENDIX 1

### Actions where there are concerns about a child



## APPENDIX 2 – Safeguarding and Child Protection Risks

These appendices are based on the Department for Education's statutory guidance

### Types of Abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).

- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers).
- Ensure access to appropriate medical care or treatment.

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

### **Appendix 3**

**Annex B further specific safeguarding information** should be read and referred to regularly.

#### **Assessing adult-involved nude and semi-nude sharing incidents**

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

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

#### **Sexually motivated incidents**

In this type of incident, an adult offender obtains nude and semi-nudes directly from 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 platform.
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes.
- Offered something of value such as money or gaming credits.
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images.

### **Financially motivated incidents**

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them. 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.
- 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 platform.
- Pressured into taking nudes or semi-nudes.
- Told they have been hacked and they have access to their images, personal information and contacts.
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

### **Child abduction and community safety incidents**

This is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Other community safety incidents in the vicinity of the Academy can raise concerns amongst parents and children.



### **Child criminal exploitation**

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

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

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

Indicators of CCE can include a child:

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

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

### **Child sexual exploitation**

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

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

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

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

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

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

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

### **Children missing from education**

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This is unexplainable and/or persistent absences from education. 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. See also Children Missing from Education Policy

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 an Academy.
- Come from new migrant families.

We will follow our procedures for unauthorised absence 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 Academy without a new Academy 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, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. This can be very stressful for children and they will need appropriate support.

### **Children with family members in prison**

Approximately 2000,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

### **County lines**

This is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of 'deal-line'.

It can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell 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 the Academy or in the wider community.

### **Cybercrime**

Criminal activity committed using computers and/or the internet. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cybercrime. Referrals can be made to the Home Office Cyber Choices programme.

### **Domestic abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. It introduces a statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The definition ensures different types of relationships are captured, including ex-partners and family members. It captures a range of different abusive behaviours, including physical, emotional and economic abuse, and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected".

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and

psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

### **Female genital mutilation (FGM)**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Where a member of staff has concerns that an act of FGM appears to have been carried out or a girl is at risk of such a procedure they must inform the DSL or head/principal without delay. There is a specific legal duty on Academies to report such concerns to the police.

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. 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. Some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Academies can play an important role in safeguarding children from forced marriage. Since February 2023, it's been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

### **Homelessness**

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

### **Mental Health**

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education. Attendance can also be impacted by mental health.

### **Modern slavery**

This encompasses human trafficking and slavery, servitude and forced or compulsory labour. There is a national referral mechanism for reporting suspected cases.

### **Preventing radicalisation**

Children are susceptible/vulnerable to extremist ideology and radicalisation. Protecting children from this risk should be part of an Academy's safeguarding approach. Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration.

## **Sexual violence and sexual harassment between children in Academies**

Sexual violence and sexual harassment can occur:

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

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 Academy.

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 Academy that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours.
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

## **Serious violence**

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from the

Academy, a change in friendships, involvement with older individuals or groups, significant decline in performance or signs of injury.

**So-called ‘honour-based’ abuse (HBA)**

This encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Further information and links to support services can be found in Annex B of KCSIE