DANES EDUCATIONAL TRUST

CHILD PROTECTION & SAFEGUARDING POLICY- The Beaconsfield School

RESPONSIBILITIES	
To determine and approve policy and ensure compliance	Danes Educational Trust Board
To implement, deliver and comply	Headteacher and School Board
APPROVAL DATE	August 2026
COMMITTEE	Trust Board
DURATION	1 Year
REVIEW DATE	Summer 2027
SLT LEAD	Director of Inclusion

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STATEMENT OF INTENT

Please note that throughout this policy school boards are referred to as governing bodies.

Danes Educational Trust is committed to safeguarding and promoting the physical, mental and emotional welfare of every child, both inside and outside of each Trust setting irrespective of race, age, ability, gender, language, religion, sexual orientation and culture. We implement this Trust wide preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

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

- Ensuring that members of the Trust Board, Trust Central Services and the governing body, the headteacher and staff of each setting understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to their Designated Safeguarding Lead (DSL).
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any child that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that any Trust employees or volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

BUCKINGHAMSHIRE SAFEGUARDING CHILDREN PARTNERSHIP PROCEDURES

The Trust follows the procedures established by the Buckinghamshire Safeguarding Children Partnership (BSCP); a guide to procedure and practice for all agencies in Buckinghamshire working with children and their families. https://www.buckssafeguarding.org.uk/childrenpartnership/

IMPORTANT CONTACTS

For any Child Protection concerns the first point of contact should be the Designated Safeguarding Lead of the school. In their absence, matters will be dealt with by their deputy DSL.

Parents or members of the public should raise safeguarding concerns by speaking with the DSL of the school. If there are concerns with the school response, they can either make contact with the Trust safeguarding lead or by contacting Children Services directly. Where there are clear concerns about immediate risk of harm to a child, a referral should be made immediately to Children's Services or by contacting the police on 101 (999 in an emergency).

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	**Marc Brannon**	**tbssafeguarding@beaconsfield.school** 01494 673450
Deputy DSL (DDSL)	**Laura Barton-Burrowes**	**tbssafeguarding@beaconsfield.school** 01494 673450
Other staff who have the same level of safeguard training as the DSL and DDSL and are able to deal with safeguarding issues in the absence of the DSL and DDSL are	**Laura Nicholas (DDSL-Maternity cover)** **Emma Young (Interim Head of School)** **Shannon Bates (Head of 6th form)** **(6th form safeguarding only)**	
Local authority designated officer (LADO)	**Mark Blackwell** **secure-LADO@buckinghamshire.gov.uk** 01296 382 070	
School Board Chair of governors	**Felicity Poole**	**fpoole@beaconsfield.school**
Trust Safeguarding Leads	**Mrs Sara Crute-Mussell**	01923 284169
Channel helpline (Preventing Extremism in Education)	020 7340 7264 or counter.extremism@education.gov.uk for non urgent concerns	
Local Authority Children Services	01296 383962	

ACRONYMS

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

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to

		education. The plan identifies any additional support needs or interventions and the intended impact they will have for the child.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC (or CLA)	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT (Academies)	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools

NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Pupils who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which children learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all children. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

DEFINITIONS

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

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

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children' 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.

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

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

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

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

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.

- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
    - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
    - Sharing unwanted explicit content.
    - Upskirting.
    - Sexualised online bullying.
    - Unwanted sexual comments and messages, including on social media.
    - Sexual exploitation, coercion, and threats.

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

For the purposes of this policy, **"making or sharing of nude or semi-nude images and/or videos"** refers to the creation, possession or sharing of nude or semi-nude images and/or videos involving anyone under the age of 18. This includes consensual and non-consensual sharing, AI-generated content where it depicts a child, and content shared

“Deep fakes” and **“deep nudes”** refer to digitally manipulated and AI-generated images, audio or videos that falsely depict a person. Where these involve nude or semi-nude images of a child, they will be managed in accordance with the school's procedures for responding to the making or sharing of nude or semi-nude images and/or videos.

For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

Indecent images also include indecent **“pseudo-images”**, which are images that have been created or manipulated using computer software and/or AI.

For the purposes of this policy, **“abuse”** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the

internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

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

For the purposes of this policy, **"emotional abuse"** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

1. LEGAL FRAMEWORK

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

Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use of Access) Act 2025
- SCHOOLS WITH CHILDREN AGED UNDER 8: The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Children's Wellbeing and Schools Act 2026

Statutory guidance

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales''
- DfE (2023) 'Working Together to Safeguard Children 2023'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2026) 'Keeping children safe in education 2026'
- DfE (2026) 'Working together to improve school attendance 2026'
- DfE (2025) 'Academy trust handbook 2025
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2025) 'Academy trust governance guide'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2025) 'Filtering and monitoring standards for schools and colleges'
- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'
- DfE (2022) 'Meeting digital and technology standards in schools and colleges 2022'
- DfE (2026) 'Restrictive interventions, including the use of reasonable force, in schools 2026'

This policy operates in conjunction with the following Trust and school policies:

- Allegations Against Staff of Abuse Policy
- Anti-bullying Policy
- Attendance (including children missing in education) policy
- Behaviour
- Cyber Response Plan
- Data Security Policy
- Data Protection including Biometrics Policy
- Data Retention Guidelines
- LAC Policy
- Mobile Devices Policy
- Online Safety Policy
- Artificial Intelligence Policy
- Safer Recruitment Policy
- Suspension, Exclusions and Appeals Policy
- Staff Code of Conduct (including ICT and Electronic Devices)
- Staff Disciplinary Policy (also includes what to do with low-level safeguarding concerns)
- Whistleblowing Policy

2. ROLES AND RESPONSIBILITIES

The Board of trustees is responsible for:

- Carrying out their functions to safeguard and promote the welfare of children in all schools within the trust.
- Understanding their safeguarding duties and having regard to any statutory guidance on safeguarding issued by the Secretary of State.
- Taking strategic leadership responsibility for the trust's safeguarding arrangements.
- Ensuring the suitability of staff, supply staff, volunteers, contractors, and proprietors.
- Making sure that all schools within the trust have effective safeguarding policies, procedures and training in place that comply with their statutory obligations.

- Ensuring that the policies and procedures adopted by local governing boards, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.
- Having procedures in place to monitor the implementation of safeguarding policies and procedures regularly.
- Ensuring that all governors and trustees receive appropriate safeguarding and child protection training at induction, and that this training is updated regularly thereafter.
- Commissioning safeguarding audits of each school and the trust.
- Receiving regular reports from the trust executive on safeguarding to the board of trustees delegating operational responsibilities.
- Ensuring that every school within the trust complies with its duties under the above child protection and safeguarding legislation.
- Facilitating training opportunities trust-wide to ensure consistency in the level of training and expertise in safeguarding across the trust's schools.
- Guaranteeing that each school within the trust contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirming that the trust's safeguarding arrangements take into account the procedures and practices of the relevant LAs as part of the inter-agency safeguarding procedures.
- Understanding the local criteria for action and the local protocol for assessment for each school within the trust and ensuring these are reflected in the trust's policies and procedures.
- Ensure that the schools have effective arrangements in place for community-based early help and targeted family help, and that staff understand their role in identifying pupils who may benefit from support before statutory intervention.
- Complying with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensuring that staff in schools working directly with children read at least part one of KCSIE.
- Ensuring that staff in schools read part one KCSIE. **NB:**
- Ensuring that mechanisms are in place to assist staff in schools to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensuring schools within the trust appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Ensuring schools within the trust appoint one or more DDSLs to provide support to the DSL and ensuring that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Ensuring each school within the trust facilitates a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern within a school that is part of the trust, ensuring there are procedures in place to take the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensuring systems are in place within the trust for pupils to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensuring that procedures are in place within the trust so that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Have overall strategic responsibility for filtering and monitoring, seek assurance that the filtering and monitoring standards for schools are being met, and that the effectiveness of filtering and monitoring systems is reviewed at least annually, including that appropriate checks are undertaken on all internet-connected devices and a record of those checks is maintained.

- Ensuring that a member of the local governing board for each school within the trust is nominated to liaise with the school's LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Ensuring all relevant persons are aware of the trust's safeguarding arrangements, including the board of trustees itself, and each school's DSL, DDSL(s) and SLT.
- Making sure that pupils in each school are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhering to statutory responsibilities by ensuring pre-employment checks are conducted on all staff within the trust who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensuring that staff within the trust are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensuring each school within the trust has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guaranteeing that volunteers within the trust are appropriately supervised.
- Making sure that at least one person on any appointment panel within the trust has undertaken safer recruitment training.
- Ensuring that all staff within the trust receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensuring each school within the trust takes overall strategic responsibility for filtering and monitoring and seek assurance that the filtering and monitoring standards for schools are being met
- Certifying that there are procedures in place within the trust to handle allegations against staff, supply staff, volunteers and contractors.
- Confirming that there are procedures in place within the trust to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guaranteeing that there are procedures in place within the trust to handle pupils' allegations against other pupils.
- Ensuring that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff within the trust.
- Ensuring that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child and teenage relationship abuse within the trust.
- Guaranteeing that there are systems in place for pupils to express their views and give feedback within the trust.
- Establishing an early help procedure and ensuring all staff within the trust understand the procedure and their role in it.
- Appointing a designated teacher for LAC within each school to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensuring that the designated teacher for LAC within each school works with the virtual school head(s) (VSH) to discuss how the pupil premium funding can best be used to support LAC.
- Introducing mechanisms to assist staff within the trust in understanding and discharging their roles and responsibilities.
- Making sure that staff members within the trust have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.

- Putting in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensuring the trust has put in place appropriate safeguarding responses for pupils who go missing from a school within the trust, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and preventing the risk of their disappearance in future.
- Ensuring that all members of the board of trustees have been subject to an enhanced DBS check.
- Creating a culture within the trust where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring that robust safeguarding records are kept in each school and the effectiveness of recordkeeping is monitored.
- Acting in accordance with their obligations under the Human Rights Act 1998 the Equality Act 2010, and the trust's local multi-agency safeguarding arrangements.
- Ensuring each school within the trust has appropriate arrangements are in place to keep children safe where school facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks.
- Ensuring each school within the trust has safeguarding requirements that are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.
- Ensuring each school within the trust has robust health and safety and emergency evacuation procedures.

The Trust safeguarding committee is responsible for:

- Any responsibilities delegated to it by the board of trustees.
- Investigating any activity within its terms of reference.

The designated safeguarding trustee is responsible for:

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

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

- Ensure that the policies and procedures adopted by the trust, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff within the trust with the appropriate policies and information upon induction.
- Ensure that appropriate filtering and monitoring systems are implemented and that staff understand their roles and responsibilities in relation to filtering and monitoring.
- Ensure that the school practises safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in Keeping Children Safe in Education and the Education (Independent School Standards) (England) Regulations 2014 as amended.

- Ensure that, where the school ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS within one month.

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

- Take lead responsibility for safeguarding and child protection within their school, including online safety and understanding the filtering and monitoring systems and processes in place.
- Coordinating the school's approach to community-based early help and targeted family help
- Report on an agreed basis to the school board and the board of trustees via the agreed route of communication.
- Refer cases:
    - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
    - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
    - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
    - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Ensure each member of staff within their school has access to and understands the trust-wide and individual school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the local governing board to ensure their school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Understand the importance of information sharing within the trust, including within school, with the trust's other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Adhere to any other school-level duties outlined in their school's Child Protection and Safeguarding Policy and their job description.
- Adhere to any safeguarding arrangements specified in the trust's funding agreement.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.
- Understand the relevant data protection legislation and regulations, especially the Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act 2025.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically, including through community-based early help, family help and statutory services where appropriate.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
    - Ensuring that the school knows which pupils have or had a social worker.
    - Understanding the academic progress and attainment of these pupils.
    - Maintaining a culture of high aspirations for these pupils.

    - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
    - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- The school within the Trust will ensure that appropriate arrangements are in place to provide effective DSL cover during school hours. Safeguarding information will be shared securely where necessary to ensure continuity of safeguarding arrangements and timely responses to concerns.

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

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

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

- Consider, at all times, what is in the best interests of the pupils in the trust.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide safe environments in which pupils can learn.
- Read and understand at least 'Part one' of KCSIE
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the trust's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and DDSL(s) within the relevant school.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the school's arrangements for community-based early help and targeted family help and understand their role in identifying pupils who may benefit from support before statutory intervention
- Be aware of local safeguarding partnership arrangements and understand the referral pathways to CSCS.

- Support social workers in making decisions about individual children, in collaboration with the DSL within the relevant school.
- Be aware of and understand the trust's procedure to follow in the event that a pupil confides they are being abused, exploited or neglected.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Promote dialogue and understanding, and ensure all pupils feel listened to and understood.
- Empower pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes and challenge it in a professional way if it occurs.
- Be aware of safeguarding issues that, including technology-facilitated abuse, can put pupils at risk of harm.

- Speak to their school's DSL or DDSL(s) if they are unsure about how to manage safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.

3. MULTI-AGENCY WORKING

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

The schools within the trust will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

The trust will develop trusting relationships between families and agencies to protect the welfare of its pupils, through community-based early help processes and targeted family help by contributing to multi-agency plans to provide additional support.

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

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

The trust will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspectives to evaluate provision.
- Prioritising and sharing resources depending on children's needs.
- Celebrating inclusivity and diversity and challenging discrimination.
- Mutually and constructively challenging others assumptions in a respectful manner.

Information sharing

The trust recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet children' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members within the trust and its schools will be made aware that there may be legal or statutory requirements to share information for safeguarding purposes when requested by relevant agencies.

Where decisions are made about sharing or withholding information, these will be based on consideration of the risks to the pupil and, where appropriate, the rationale for decisions will be recorded

4. SUPPORT BEFORE STATUTORY INTERVENTION

Support before statutory intervention means providing help as soon as a problem emerges, at any point in a child's life. This may include support from universal services, community-based early help, or targeted family help, depending on the child's level of need.

Schools within the trust will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.

Any pupil may benefit from support before statutory intervention; however, staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Are pregnant or a parent themselves.
- Have exhibited early signs of abusive, violent or harmful behaviours.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Have been repeatedly removed from the classroom.
- Are on part-time timetables.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or including sexual or criminal exploitation.
- Are at risk of being radicalised into terrorism
- Have family members in custody or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a PRU.

The trust will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from community based early help, for example, if they are:

- Bereaved.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Have recently returned home to their family from care.

- Missing education, or are persistently absent from school, or not in receipt of full-time education.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

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

'Early Help' is Buckinghamshire's programme of early help services for families. A directory of early help services is available at https://www.buckssafeguarding.org.uk/childrenpartnership/parent-and-carers/how-to-get-help/ and will help practitioners and families find information and support to prevent escalation of needs and crisis.

Staff within the trust may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the child's situation is not improving or is worsening.

DSLs within the Trust may be required to support external agencies and professionals during a community-based early help or family help assessment and, in some circumstances, may act as the Lead Practitioner, where appropriate and in accordance with local arrangements.

5. ABUSE, NEGLECT & EXPLOITATION

All staff working within the trust will be aware of the indicators of abuse, neglect and exploitation and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, in an institutional or community setting by those known to them or by others online. Staff will also be aware that children can be affected by seeing, hearing or experiencing the effects of abuse.

All staff working within the trust will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. Schools will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

All staff working within the trust will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriate to such concerns in order to safeguard and promote the welfare of all pupils.

All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

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

These harms include, but are not limited to:

- Sexual abuse, including harassment and exploitation.
- Domestic abuse in their own intimate relationships, including physical, sexual, emotional abuse, and stalking.
- Criminal exploitation, including financial exploitation.
- Serious youth violence.
- County lines.
- Radicalisation.

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

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

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

Staff will also understand that child-on-child abuse can occur online and can take the form of:

- Abusive, harassing, misogynistic or misandrist messages.
- The non-consensual making or sharing of nudes or semi-nudes, particularly within group chat.
- Sharing of abusive images and pornography to those who do not wish to receive such content.

Staff will always speak to the DSL or deputy if they are unsure about something in relation to abuse, neglect or exploitation.

6. SPECIFIC SAFEGUARDING ISSUES

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

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

7. CHILD-ON-CHILD ABUSE (including Sexual Harassment & Assault)

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

The trust challenges all forms of abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

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

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up". Staff will understand that recognising

behaviours early and putting in place timely, evidence-based support can be vital in preventing child-on-child abuse.

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

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse – such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Serious Physical assault and harm, or threat of harm with a weapon - his may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

The trust is aware that some children may be particularly vulnerable and have an increased risk of abuse. Each school within the trust will recognise that pupils with SEND or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The school will consider extra pastoral support for those children.

The trust understands that all pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability and will ensure that all schools within the trust give special consideration to, amongst others, pupils who:

- Have SEND.
- Are vulnerable to being bullied.
- Are looked after or living in unsupportive home situations.

DSLs working in schools within the trust will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

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

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

The school's procedures for managing concerns or allegations are outlined in Appendix II of this policy. Staff will follow these procedures, as well as the procedures outlined in the Anti-bullying Policy and Suspension, Exclusion & Appeals Policy, where relevant.

Where there is a suspected case of sexual assault or sexual harassment each school will follow the checklist in Appendix III to ensure a consistent approach is taken with regards appropriate and timely support of the victim(s), alleged perpetrator(s) and others and that staff training and wider curriculum delivery around sexual violence is reviewed after each event.

The school recognises that harmful behaviours exist on a continuum and will respond proportionately, considering the age, developmental stage, intent, frequency and seriousness of the behaviour, as well as the needs of all children involved

8. ONLINE SAFETY AND TECHNOLOGY

Schools will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

The trust will ensure that staff training in online safety in each of its schools covers the four categories of risk as outlined in KCSIE:

- Content - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation, and conspiracy theories.
- Contact - Training will address the risks of harmful online interaction with other users. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.
- Conduct - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as creating, sending, or receiving explicit images, the distribution of other explicit material, and instances of online bullying.
- Commerce - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams. Any concerns that pupils or staff may be at risk will be reported promptly to the Anti-Phishing Working Group or through appropriate safeguarding channels.

The trust will ensure that each of its schools have appropriate filtering systems in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the trust's Data-security Policy. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what children can be taught online. The school will also ensure that it meets the filtering and monitoring standards published by the DfE.

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

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

Communicating with parents

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

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

Reviewing online safety

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the trust and its schools, in accordance with the Staff Code of Conduct and Online Safety policy.

Trust schools will review the effectiveness of its filtering and monitoring systems at least annually. This review will be led by the member of the SLT responsible for filtering and monitoring, with support from the DSL, the Trust Safeguarding lead and ICT support where appropriate. The review will include checks that filtering and monitoring systems are operating effectively on all internet-connected devices in relevant locations, and a written record of the review will be maintained.

Mobile Devices Policy

The Trust approach to mobile phones and smart technology will be set out in the Mobile Devices Policy and will take account of the safeguarding risks associated with pupils having unlimited and unrestricted access to the internet via mobile networks. It will ensure that pupils do not have access to mobile phones throughout the school day, including during lessons, the time between lessons, breaktimes and lunchtime, except where an exemption applies.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent. The trust will ensure that procedures are in place for school DPOs will oversee the planning of any events where photographs and videos will be taken.

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

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

Upskirting

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

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

9. CONSENSUAL AND NON-CONSENSUAL SHARING OF INDECENT IMAGES AND VIDEOS

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

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

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

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes apply to digitally manipulated and AI-generated imagery.

Where a member of staff within the trust becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the affected schools DSL immediately. Further guidance can be found in Appendix I and the approach to dealing with an incident can be found in Appendix III Responding to Incidents of YPSI. The DSL will work to support the affected pupils and inform them of the reporting routes to remove a nude or semi-nude that has been shared online or to prevent an image from being shared online.

10. APPROPIATE PHYSICAL CONTACT WITH PUPILS

Trusts schools will not operate a 'no contact' policy. They will also not agree to any request from parents or staff that would prevent the use of reasonable force and other restrictive interventions where these may be necessary and lawful. A 'no contact' approach could leave staff unable to intervene appropriately to safeguard pupils and others.

Physical intervention and reasonable force may be used in limited circumstances and the subsequent follow actions and records will be in line with the DfE Restrictive interventions, including use of reasonable force, in schools.

The school will adopt sensible policies and practices which will allow and support staff to make appropriate physical contact with pupils where this is necessary, proportionate and in the best interests of the child. There will be circumstances in which physical contact will be appropriate and will not give rise to concerns about the use of reasonable force or restrictive interventions.

Examples of circumstances where physical contact will generally be appropriate include:

- Providing first aid.
- Guiding or escorting pupils, e.g. holding the hand of a younger pupil when moving around the school or on a school trip, supporting a pupil to move to a space they have chosen to access in order to self-regulate, or assisting pupils to move safely.
- Comforting a distressed pupil.
- Congratulating or praising a pupil, e.g. a handshake or a brief pat on the back.
- Demonstrating how to use a musical instrument or techniques during PE lessons or sports coaching.

When deciding whether physical contact will be appropriate in a particular situation, staff will use their professional judgement will have regard to:

- This policy and any other relevant policy.
- Any current risk assessments in place for a pupil
- The context and circumstances, including whether other adults are present.
- The individual pupil's age and level of understanding.
- Any other relevant factors, including, but not limited to:
- Whether the pupil has SEND or other vulnerabilities.
- Whether alternative strategies that do not involve physical contact could be used.

Seclusion and Environmental Restraint

- Seclusion: a non-disciplinary intervention involving keeping a pupil confined to a place away from others and prevented from leaving. Under 2026 rules, it is only lawful as a safety measure to protect others from harm when a pupil is experiencing high levels of emotional or behavioural dysregulation. The place to which the pupil is confined should be safe and not feel threatening or intimidating to the pupil. The pupil should be supervised at all times during the period of seclusion.
    - An incident involving the use of seclusion must be recorded and reported in accordance with the procedures outlined in the section on Recording and reporting duties.
- Distinction from "Time-Out": Seclusion is strictly a safety measure and must be distinguished from "Time-Out" or "Withdrawal." Time-out (where a pupil is asked to go to a quiet area to de-escalate) is not seclusion, provided the pupil is physically free to leave the area at any time.
- Environmental Restraint: Changing the environment to restrict movement (e.g., locking a door or using high-handled latches). This must be noted in a pupil's Individual Risk Assessment.

Incidents of restrictive interventions or seclusion must be recorded as soon as practicable after the event. It should be recorded by the staff member(s) involved and they should endeavour to do this no later than the same day.

The record must clearly detail:

1. The names of all pupils and staff involved and any relevant information of the pupil
2. A brief account of the incident, including
    a. identified or potential triggers
    b. any preventative or de-escalation strategies used
    c. Where relevant what type of reasonable force was applied, the degree of force, and details of any physical injuries sustained
3. The de-escalation strategies attempted prior to the intervention.
4. Details of any injuries sustained by pupils or staff and the post incident support provided
5. Record of parent/carer informed of the incident
6. Details of the repair phase including demonstrating on going duty of care

Trust safeguarding will monitor the use of restrictive intervention to ensure school leaders are identifying and improving their practice, including providing accredited training for staff. Working to understand pupils repeat patterns and triggers to minimise the restrictive interventions.

11. CONTEXT OF SAFEGUARDING INCIDENTS

Safeguarding incidents can occur outside of schools within the trust and can be associated with outside factors. All staff, particularly DSLs and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

12. PUPILS POTENTIALLY AT GREATER RISK OF HARM

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

Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage, including barriers to attendance, learning, behaviour and mental health.

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

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

Children who are absent from education

The Trust recognises that pupils who are absent from education for prolonged periods and/or on repeated occasions may be at increased risk of abuse, neglect, CCE and CSE, including county lines.

Trust schools will respond to concerns relating to attendance in accordance with its Attendance and Absence Policy (which includes Children Missing Education) and will work with CSCS and other agencies where absence gives rise to safeguarding concerns.

Home-educated children

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

In line with the School Attendance (Pupil Registration) (England) Regulations 2024, each school within the trust will ensure it informs their LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a child from school for EHE, the school, will consult with the LA and other key professionals, to see whether a meeting with the parent is beneficial, before the final decision has been made, particularly if the child has SEND, is vulnerable, and/or has a social worker.

Pupils requiring mental health support

The Trust recognises that mental health problems can, in some cases, develop into safeguarding concerns. This may include self-harm, signs of an eating disorder, suicidal ideation or suicide, or indicate that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Only appropriately trained professionals will make a diagnosis of a mental health condition; however, all staff will play an important role in promoting positive mental wellbeing, identifying pupils who may require support, ensuring there is early intervention and the referral concerns where appropriate.

Where support is required, the DSL or deputy will consider whether parents should be informed where doing so will not place the pupil at additional risk. Where safeguarding concerns are linked to a pupil's mental health or emotional wellbeing, the DSL or deputy will liaise with the school's senior mental health lead to ensure the pupil receives coordinated support.

Trust schools will maintain a whole-school approach to promoting positive mental health and wellbeing and will make use of appropriate internal and external support services where required.

Looked After Children and Previously Looked After Children (also known as CLA)

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

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

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.

- Care arrangements and the levels of authority delegated to the carer by the authority looking after the child.

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

Young Carers

The Trust recognises that caring responsibilities may have a significant impact on a pupil's attendance, attainment, behaviour and wellbeing.

The schools will seek to identify young carers at the earliest opportunity and will work with pupils, families and external agencies to ensure that appropriate support is provided.

Pupils with SEND

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

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability.
- Pupils with SEND can be disproportionately impacted by issues such as peer isolation, bullying, and prejudice-based bullying without outwardly showing any signs.
- Communication barriers may exist, as well as difficulties in overcoming these barriers.
- Pupils with SEND may not always recognise that what is happening to them is abuse.
- Pupils requiring increased adult care, intimate care or who are more isolated from others may be at increased risk.
- Pupils may have difficulty understanding the difference between fact and fiction online or understanding the consequences of their online behaviour.

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL in the affected school will liaise with the school's SENCO and consider if additional pastoral or communication support is required. The pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

Pupils with medical conditions

The Trust recognises that pupils with medical conditions or allergies may require additional safeguarding consideration.

A safeguarding referral will not be made solely because of an incident relating to the management of a pupil's medical condition; however, where concerns indicate that a pupil may be at increased risk of neglect, abuse or exploitation, for example where essential medical information or medication is repeatedly not provided, the school will respond in accordance with its safeguarding procedures.

Pupils will be supported in accordance with the schools Supporting Pupils with Medical Conditions Policy.

Pupils who are lesbian, gay or bisexual

The fact that a pupil is lesbian, gay or bisexual is not in itself an inherent risk factor for harm; however, staff will be aware that these pupils and those who are perceived by others to be lesbian, gay or bisexual can be just as vulnerable to discriminatory bullying. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out, respond to bullying to ensure pupils feel safe and supported.

Pupils who are questioning their gender

The Trust recognises that some pupils may question their gender and that they may have additional vulnerabilities, including mental health or psychosocial needs.

The schools will take time to understand the individual circumstances of pupils who are questioning their gender and will respond on a case-by-case basis, acting in the best interests of the pupil and taking account of the safety and wellbeing of all pupils.

The school will not initiate action relating to social transition. Where a request for support is received from a pupil or their parent, the school will respond in accordance with the latest DfE guidance, taking a cautious approach, involving the DSL and, except where doing so would place the pupil at risk of significant harm, working in partnership with parents.

Where a pupil discloses that they are questioning their gender or requests support in relation to social transition, staff will listen carefully and respond sensitively. Staff will not promise confidentiality and will explain that any information shared may need to be discussed with the DSL in order to safeguard and promote the pupil's welfare.

The school will maintain a culture in which bullying is not tolerated and will ensure that pupils who are questioning their gender receive appropriate safeguarding support and are able to raise concerns with trusted members of staff.

The DSL will ensure that appropriate records are maintained of any requests relating to social transition, the factors considered, decisions made, and the reasons for those decisions. Records will be kept securely in accordance with the Data Protection Policy.

13. USE OF THE SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES

Where schools within the trust hire or rent out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep children safe. The trust will ensure schools refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

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

Where activities are provided separately by another body, this may not be the case; therefore, the school board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The school board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The school board will ensure safeguarding requirements are included in any transfer of

control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

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

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

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

14. ALTERNATIVE PROVISION

The trust will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the schools within the trust will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff. In addition, regular opportunities for communication with the pupil will be included and documented at any review of provision.

Those responsible for the commissioning of alternative provision will be aware that pupils in alternative provision will often have complex needs - they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

When an alternative provision has been commissioned for a pupil, the following steps will taken by the schools

- The school will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out and written confirmation that the alternative provider will inform the school of any arrangements that may put the pupil at risk.
- The school will continue to carry out safeguarding checks and conduct its own due diligence to ensure that the AP is appropriate for meeting each pupil's individual needs
- The school will ensure that the location of pupils placed at AP is always known and will maintain records of the address of the alternative provider and any subcontracted provision or satellite sites the pupil may attend.
- AP placement reviews will take place at least half termly to ensure that pupils are regularly attending, and the placement continues to be safe and meets their needs.
- Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

15. WORK EXPERIENCE

The trust will ensure that schools have the appropriate procedures in place to ensure that providers of work experience have appropriate safeguarding policies and procedures in place. Where pupils are undertaking work experience at the trust or one of the schools within the trust, an enhanced DBS check will be obtained if the pupil is over the age of 16. Schools will not allow someone on the barred list to engage in regulated activity with a pupil on a work experience placement.

16. HOMESTAY EXCHANGE VISITS

School-arranged homestays in UK

Where schools within the trust are arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, schools will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

The trust will ensure that schools within the trust are aware of their responsibility to liaise with partner schools to discuss and agree the arrangements in place for the visit. Schools within the trust will be expected to consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK.

Each school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs, or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement, and the individual trust school is not the regulated activity provider.

Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a pupil with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

17. REPORTING AND RESPONDING TO CONCERNS ABOUT PUPILS

The trust and its staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. Staff will always act in the best interests of a pupil when they are concerned about their welfare.

Staff will be aware that data protection laws do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If there is any doubt about sharing information, staff will speak to the DSL or deputy. Fears about sharing information will not stand in the way of the need to safeguard and promote the welfare of children.

The Trust will approve and continuously monitor the procedures within each school for reporting concerns about pupils' welfare. Including when the DSL or Deputy DSL are unavailable. Monitoring visits will be conducted by the designated safeguarding trustee at least termly and will assess whether each school:

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

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

Staff will not assume that a colleague or other professional will take action and share information that might be critical in keeping pupils safe. Staff will be mindful that early information sharing is vital for effective identification, assessment, and allocation of appropriate service provision. The trust will ensure that all staff members, including those working within the trust's schools, are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the Communication and confidentiality section of this policy.

The trust does not tolerate child-on-child abuse, which is defined as abuse between children under the age of 18.

Determining the appropriate response

Following a report, the DSL or deputy DSL will consider the information provided, the pupil's level of need and any known history before determining the most appropriate course of action.

This may include:

- Managing any support for the pupil internally via the school's pastoral support processes, informing parents whilst considering where doing so does not place the pupil at additional risk.
- Undertaking a family help assessment or making a referral to statutory services.

Where a community-based early help or family help assessment is undertaken, the DSL and relevant school staff will coordinate and contribute regularly to the school's involvement with partner agencies.

Staff members will be advised to read the DfE's guidance on information sharing to support them in the event that they need to make a decision about sharing information.

Referrals and multi-agency working

Where a pupil is suffering, or is likely to suffer, significant harm, or is in immediate danger, a referral will be made immediately to CSCS and/or the police, as appropriate. Where a criminal offence is suspected, including incidents of sexual violence, the police will be notified without delay.

The reporting and referral process outlined in the DfE's flowchart setting out the actions taken where there are concerns about a pupil will be followed accordingly.

The DSL will be familiar with local safeguarding partnership referral arrangements and will provide advice and support to staff where required. Information will be shared with external agencies in accordance with data protection legislation and the school's confidentiality procedures.

Where the school makes a referral, the DSL will expect to receive confirmation of the LA social worker's decision within one working day. Where this information is not forthcoming, the DSL will follow this up. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

The DSL will maintain effective liaison with CSCS, the police and other relevant agencies to support the pupil's welfare and ensure that the school does not compromise any ongoing investigations.

The school will not wait for the outcome of a statutory or criminal investigation before taking appropriate action to safeguard and support the pupil. Where statutory intervention is not required, the school will continue to consider appropriate support through community-based early help, family help, pastoral support or other suitable interventions.

Supporting pupils and recording concerns

The reporting and referral process outlined in Appendix V will be followed accordingly.

Where safeguarding concerns arise, the school will ensure that the pupil's wishes and feelings are taken into account and that pupils are given opportunities to express their views. Staff will respond calmly and supportively, ensuring pupils feel listened to, taken seriously and supported.

Discussions with parents will take place where appropriate and where doing so will not place the pupil or others at increased risk of harm. The school will work with parents and partner agencies, where appropriate, to support the pupil's safety and wellbeing.

All safeguarding concerns, discussions, decisions and the reasons for those decisions will be recorded promptly by the DSL or deputy DSL and stored securely in accordance with the school's record management procedures.

18. CONCERNS ABOUT SCHOOL SAFEGUARDING PRACTICES

Any concerns regarding the safeguarding practices at the school will be raised with the SLT of the school, and the necessary whistleblowing procedures will be followed, as outlined in the Trust

Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

19. SAFEGUARDING CONCERNS AND ALLEGATIONS AGAINST STAFF OF ABUSE

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

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

- Behaved in a way that has harmed a child, or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Low-level concerns will be handled in line with the Trust Disciplinary Policy.

20. COMMUNICATION AND CONFIDENTIALITY

When recording, holding, using and sharing information, the DSL at each school will ensure that they:

- Understand the importance of information sharing, both within the school and the trust and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

All child protection and safeguarding concerns will be treated in the strictest of confidence.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the headteacher and DSL in the affected school will agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

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

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a child at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

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

21. SAFER RECRUITMENT

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

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

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

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

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

The trust will also ensure that trainee teachers and other individuals undertaking placements are subject to the appropriate safeguarding and recruitment checks in accordance with KCSIE and the Safer Recruitment Policy.

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

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

Referral to the DBS

The trust will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended or would have been removed had they not resigned, retired or otherwise left their role

22. SINGLE CENTRAL RECORD (SCR)

The trust will maintain a SCR detailing the checks conducted in each academy within the MAT.

The information contained within the SCR will be recorded in such a way that allows for details for each individual school to be provided separately, and without delay, to all who need to see it, including Ofsted.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

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

The SCR will also record:

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

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

23. TRAINING

The trust will ensure that staff working in each of its schools undergo safeguarding and child protection training at induction, which will be updated on a regular basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- Anti Bullying Policy
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour Policy.
- The Attendance Policy which includes Children Missing from Education.
- Appropriate child protection and safeguarding training, including online safety training - which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.

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

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE, CSE, modern slavery and trafficking, and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

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

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

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.

- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

24. MONITORING AND REVIEW

This policy is reviewed at least annually by the Trust Safeguarding Lead and is then sent to the DSL and the headteacher of each school. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

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

APPENDICES

APPENDIX I: SPECIFIC SAFEGUARDING ISSUES (including Children Missing in Education)

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

Here are the issues covered:

1. Domestic abuse
2. Homelessness
3. Children Absent from Education
4. Children Missing from Education
5. Child abduction and community safety incidents
6. Child criminal exploitation (CCE)
7. Consensual and Non-Consensual sharing of indecent images
8. Cyber-crime
9. Child sexual exploitation (CSE)
10. Modern slavery
11. FGM
12. Virginity testing and hymenoplasty
13. Forced marriage
14. Radicalisation
15. Pupils with family members in prison
16. Pupils required to give evidence in court
17. Mental health
18. Serious violence

Domestic abuse

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

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

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

Homelessness

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

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

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

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

Children Absent from Education

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

Schools within the trust will follow the DfE’s guidance on improving attendance where there is a need to work with children’s services due to school absences indicating safeguarding concerns.

Admissions register

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

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

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

The full name of the parent with whom the pupil will live

The new address

The date from when the pupil will live at that address

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

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

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

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

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

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

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

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

Children Missing from Education

All children are entitled to a full-time education, regardless of their circumstances. Unfortunately, children missing from education (CME) risk underachieving, and not being in education, employment or training (NEET) in later life, and it can act as a vital warning sign of a range of safeguarding concerns, including abuse and neglect.

The LA has a legal duty to identify when there are CME and help them back into education.

For the purposes of this section, a "child missing from education" is defined as a child of compulsory school age who is not registered at a school, not placed in alternative provision by an LA, and not receiving a suitable education elsewhere. This definition also encompasses children who are receiving an education, but not one that is suitable. A child is not defined as missing from education if they have a school place but are not attending regularly, if they are being home educated or if they attend alternative provision such as a college or Education Support Centre. Procedures for addressing instances where pupils are not attending regularly are instead set out in the school's Attendance and Absence Policy. Some children, often the most vulnerable, are at greater risk of going missing from education.

Reasons for children missing in education

Trust schools will ill be alert to the following circumstances, which may result in a child becoming CME, and will notify the LA in line with statutory requirements including the following

- failing to be registered at school at the age of five
- failing to make a successful transition
- Exclusion
- mid-year transfer of school
- families moving into a new area, including those new to the country
- Children who are awaiting the outcome of a school application or have not taken up a place offered
- Children whose whereabouts are unclear, or who have been recorded as CME for an extended period

The school will be clear that pupils who are on a school roll but are absent because of illness, persistent absence, or other reasons will not be CME if they are receiving suitable education arranged by the school or the LA. These cases will be managed as persistent absence under the Attendance and Absence Policy and safeguarding procedures, with appropriate referrals made where necessary.

Aside from these reasons, if a child is missing from education, particularly repeatedly, this can act as a vital warning sign of a range of safeguarding concerns, such as the following:

- Abuse and neglect, including child sexual exploitation (CSE) and child criminal exploitation (CCE), potentially involving county lines
- So-called 'honour-based' abuse, including FGM and forced marriage
- Mental health issues
- Risk of substance abuse

- Risk of travelling to conflict zones

Staff will be aware that early intervention is essential to identify the existence of any underlying safeguarding relating to CME and to help prevent the risks of a pupil going missing in the future. All staff will be made aware of unauthorised absence procedures and this policy to ensure they know how to respond to possible cases of CME.

Children at particular risk of missing education

As there could be many reasons for a child to be missing from education, the school will use its professional judgement on a case-by-case basis. The following list, however, indicates groups of pupils who are most at risk of missing education and the procedures the school will follow in response:

- **Children at risk of harm or neglect** – where this is suspected, local child protection procedures will be followed; however, if a child is in immediate danger or at risk of harm, a referral will be made immediately to children's social care services (CSCS), and the police if appropriate. The LA officers responsible for CME will check whether a referral has been made and will contact CSCS if this is not the case. Should there be a reason to suspect a crime has been committed or the child's safety is at risk, the LA will contact the police.
- **Children from Gypsy, Roma and Traveller (GRT) families** – when a child from a GRT family leaves the school without naming their next destination school, the school will contact the LA for advice on the best strategies to ensure minimal disruption to the child's education.
- **Children of service personnel** – the school will contact the Ministry of Defence Children's Education Advisory Service for advice to ensure continuity of education for these children.
- **Missing children and runaways** – should the school suspect a child has gone missing or run away, an appropriate staff member will consult the DfE for advice on missing children.
- **Children and young people supervised by the Youth Justice System** – in this case, LA youth offending teams are responsible for supervising children (aged 8 to 18). Where a young person is registered at the school prior to custody, the school will keep the place open for their return.
- **Children who cease to attend school** – where the reason for a child who has stopped attending a school is not known, the LA will investigate the situation.
- **Children of migrant families** – the school will remain vigilant to the increased risk of a child missing education if they are part of a new migrant family who may not yet have settled into a fixed address, or may have arrived into an LA area without the authority becoming aware.

Working with others

The statutory duty to identify CME rests with the LA; however, the school will take a proactive and preventative approach before working jointly with the LA to locate a pupil at risk of becoming a CME. Where it is necessary to submit a CME referral to the LA.

Families moving from one LA to another can sometimes lead to a child being lost in the system and consequently missing education. When a child moves, LAs will work with other LAs, regionally or nationally, to ensure this does not happen.

The LA will raise awareness of its procedures with local schools, partners and agencies working with children and families. The school will ensure that staff are familiar with these procedures and when they need to be followed.

The school uses a secure system to allow schools to transfer pupil information when a child moves to another education setting.

If a pupil with a social worker is absent from school for an unexplained reason or they are missing from education, the school will inform the pupil's social worker.

Safeguarding

Schools within the trust recognise that CME can act as a vital warning sign to a range of safeguarding issues. The school will play an active role in its involvement to identity and support CME and ensure this approach is child centred. Where there are concerns that a pupil missing from education is linked to a safeguarding issue, action will be taken in line with this Child Protection and Safeguarding Policy.

In line with the Children Act 2004, the school will follow appropriate procedures when carrying out reasonable enquiries, such as the DSL conducting discussions with neighbours, relatives or landlords, to determine whether a child may be at risk of harm.

For the purpose of this policy, **"reasonable enquiries"** are defined as limited, investigative powers that the school may action to determine a child's whereabouts and whether they may be in danger.

The DSL of each school will record that they have completed these procedures and, if necessary, make a referral to CSCS or the police.

Where the whereabouts and safety of a child is unknown, the school, in conjunction with the LA, may carry out the following actions:

- Make contact with the parent, relatives and neighbours using known contact details
- Share information from school's records and collaborate with the LA
- Check local databases
- Check data transfer systems
- Follow local information sharing arrangements, and make enquiries via other local databases and agencies where possible
- Check with UK Visas and Immigration and/or the Border Force
- Check with agencies known to be involved with the family
- Check with the LA and school from which the pupil moved originally
- Check with the LA where the pupil lives, if this is different to where the school is located
- Check with the Ministry of Defence Children's Education Advisory Service in the case of children of service personnel
- Conduct home visits via an appropriate team, following local guidance concerning risk assessments, and make enquiries with neighbours or relatives, if appropriate

Please note: This list is not exhaustive – the school and LA will use their judgement towards what reasonable enquiries are appropriate, once all the facts of the case have been taken into account.

Information sharing

The school will share information with the LA in line with statutory requirements and local CME procedures. This can include, providing statutory returns to the LA when a pupil is added to or removed from the admission register or share relevant pupil information promptly where a child leaves the school without a confirmed destination.

The school will ensure that all information sharing complies with data protection legislation and statutory guidance, and prioritises safeguarding.

Referral process for children believed to be missing from education
The referral procedure for children believed to be missing from education is followed by the school if a child they believe to be missing from education comes to their attention.
Anyone who believes a child may be missing from education can contact the CME Officer for advice
A copy of the referral form will be sought from the relevant Local Authority.

Child abduction and community safety incidents

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

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

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

Child criminal exploitation (CCE)

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

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

Specific forms of CCE can include:

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

All staff within the trust's schools will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

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

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

County lines

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

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

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

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

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

Consensual and Non-Consensual sharing of indecent images

The trust understands that creating and sharing an indecent image of an individual under the age of 18 is illegal, even if the individual sends one of themselves. Similarly, the trust understands that the sharing of an image of a child – even if it has been shared with consent – is a criminal offence. As such, the school will take its approach towards YPSI very seriously and all cases will be fully investigated (see Appendix III).

The trust also understands that the law surrounding creating and sharing indecent imagery of those under 18 was intended to criminalise adults seeking to sexually abuse under 18-year-olds, and not to criminalise under 18-year-olds. Individuals under the age of 18 will not be unnecessarily criminalised.

Cyber-crime

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

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

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

Child sexual exploitation (CSE)

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

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

Staff will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any child who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

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

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

- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Modern slavery

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

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. DSLs will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism. The trust has a modern slavery statement available on its website.

FGM

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

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

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

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

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

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

Indicators that FGM may take place soon include:

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

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

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

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

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

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

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

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

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

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

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

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues

- A pupil discloses other concerns that could be an indication of abuse, e.g they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

Schools within the trust will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

Forced marriage

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

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

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

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

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

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to the country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.

- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

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

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

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

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

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

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

Trust schools will support any victims to seek help by:

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

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

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

Schools will take a whole school approach towards educating on forced marriage in the school curriculum and environment at the appropriate age – Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

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

Radicalisation

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

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

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

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

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

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

The Prevent duty

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

Pupils with family members in prison

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

Pupils required to give evidence in court

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

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

Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff within the trust and its schools who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the school Mental Health Lead, DSL or deputy DSLs.

The trust will ensure its schools can access a range of advice to help staff members identify pupils in need of additional mental health support, including working with external agencies. It will also ensure that there is a wide variety of advice and support offered to its schools while ensuring an ethos that is positive towards being open about mental health is adopted and implemented in each school.

Serious violence

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

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

- Unexplained gifts or new possessions.

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

- Being male.
- Having been frequently absent from school or spent time in AP
- Having been permanently excluded from school.
- Having used drugs or alcohol in adolescence
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

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

APPENDIX II: HOW PUPILS CAN REPORT CONCERNS OR ALLEGATIONS

Where there is a safeguarding concern, we will aim, where possible, to take the pupil's wishes and feelings into account when determining what action to take and what services to provide. Where this may not be possible, the reason why will be recorded.

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

To achieve this, we will:

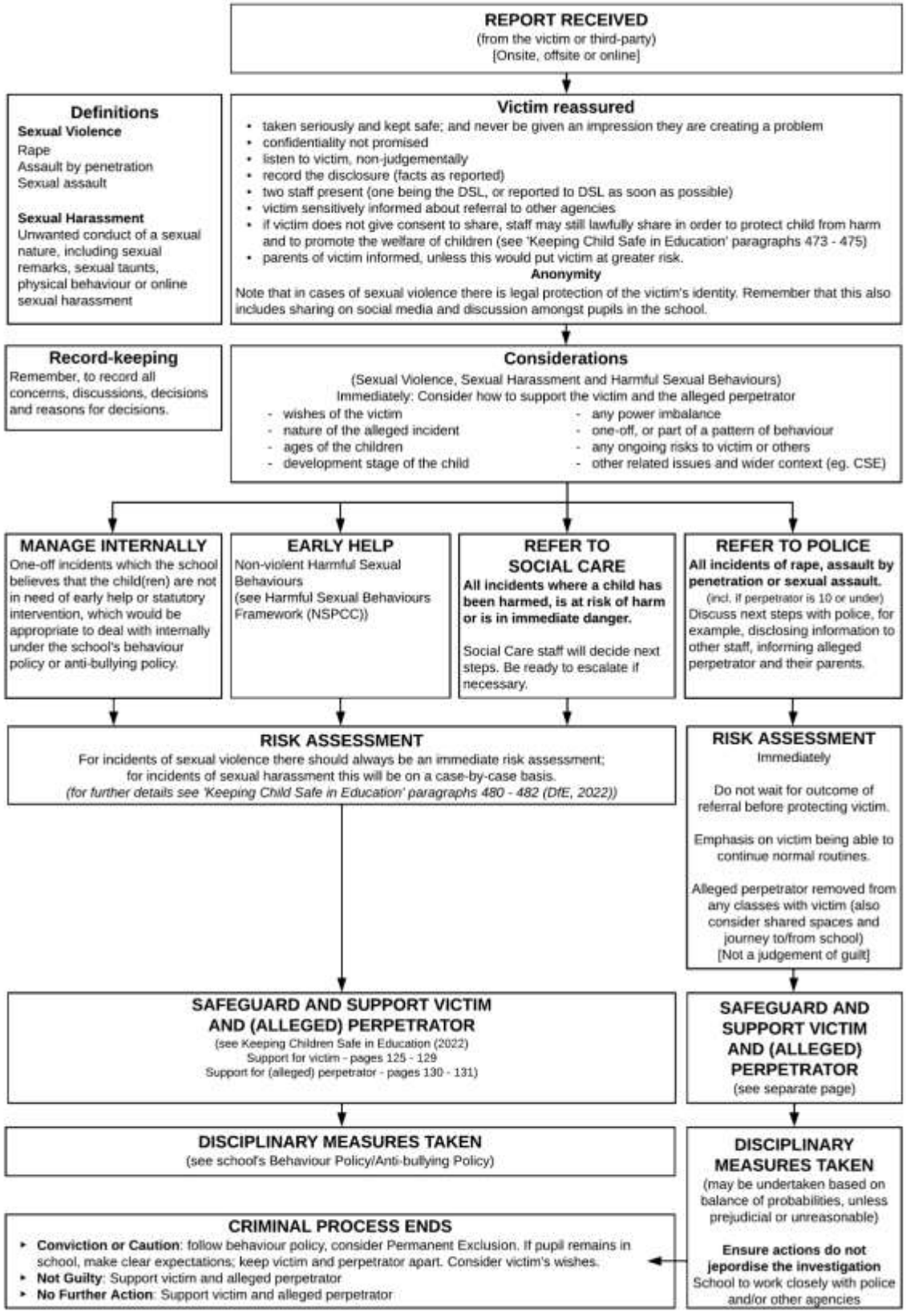
- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

At The Beaconsfield School pupils are able to confidentially report safeguarding, child-on-child or any other concerns in the following ways

How pupils can report concerns or allegations	Pupils can report safeguarding concerns about themselves or about another person by: • Speaking in person to any member of staff • Speaking to their class teacher, form tutor, head of year, pastoral support officer or the safeguarding team • Emailing their form tutor, pastoral support officer, head of year or the safeguarding team Students can also report safeguarding concerns about anyone anonymously by filling in the safeguarding concern form via the Student Sharepoint page in the following section: Wellbeing & Safeguarding
How the reporting systems and processes are shared with pupils	Reporting systems are shared with students on a regular basis through assemblies, PSHE and RSHE lessons and Personal Development Days. Form tutors remind students of the school's reporting processes regularly throughout the year during tutor time.
How pupils are made to feel safe when submitting concerns	All staff are trained on how to handle disclosures from pupils in a sensitive and supportive manner. Staff know how to assure the child that they have done the right thing by reporting a safeguarding concern and the child is always believed when the disclosure is made. Staff know that they cannot keep a disclosure a secret and they will always tell the pupil that the DSL will be informed, as well as how they will continue to be supported.
Procedures staff will follow where concerns or allegations are raised by pupils	When a concern is raised by a pupil to a member of staff, the member of staff: ● puts the pupil at ease and thanks them for disclosing ● assures them that they have done the right thing by telling a trusted adult

	● explains to the pupil that the safeguarding team will continue to support them and that the DSL will be informed ● makes clear and detailed notes of what the child has said without subjectivity or personal comment ● reports the incident to the safeguarding team immediately ● Logs the incident on CPOMS for the safeguarding team to take action As well as face-to-face reporting of safeguarding concerns to the safeguarding team, any concerns or incidents are also picked by the team on CPOMS within the hour and triaged immediately.

APPENDIX III: RESPONDING TO REPORTS OF SEXUAL VIOLENCE & SEXUAL HARASSMENT



Source:
**Keeping Children Safe in Education September 2022 (DfE, 2022)*

2022 SVSH Flowchart

Safeguarding and supporting victims and alleged perpetrators

Victim	Alleged Perpetrator	Other children
• needs and wishes of victim are paramount • not made to feel they are the problem • consider proportionality of response • aim for victim to carry out normal routine • recognise that they may struggle in class and may need time out (if they wish) • be aware that they may not disclose the whole picture immediately • prepare for support over a long period and consider who is involved (internal and external) • if victim moves school, the Designated Safeguarding Lead (DSL) informs the new school of the need for continued support	• possible tension between discipline and support (these are not mutually exclusive) • consider age/ developmental stage/any SEND • proportionate response • consider unmet needs (for example, harmful sexual behaviours (HSB) in younger children may be a sign or abuse or trauma) • if (alleged) perpetrator moves school, the Designated Safeguarding Lead (DSL) informs the new school of the issues and transfers the child protection file	• witnesses may need support (especially in cases of sexual violence) • avoid allowing pupils to 'take sides' • minimise potential for bullying or victimisation in school and on school transport • be aware of any social media use and inappropriate or even illegal posts (especially in cases of criminal investigation where anonymity is legally guaranteed) • develop safeguarding culture • constantly review reporting procedures and responses • consider potential for systematic and environmental weaknesses

Sexual Violence and Sexual Harassment – Implementation Checklist

Staff Learning and Development

- Senior Leadership Team
- Governing Body
- Designated Safeguarding Leads
- Pastoral Leads
- PSHE/SRE Leads
- All staff

Consider how specialist, external organisations could support the development of staff knowledge and understanding in this area.

Pupil Curriculum

- Developing healthy, respectful relationships
- What is consent?
- What is sexual violence/sexual harassment?
- Content in SRE/PSHE, other curriculum areas?

APPENDIX IV: RESPONDING TO INCIDENTS OF YOUTH PRODUCED SEXUAL IMAGES (YPSI)

All incidents of YPSI will be handled in accordance with the Trust's Child Protection and Safeguarding Policy.

Staff will receive appropriate and regular training on identifying and responding to incidents of YPSI.

The school will remain aware that not all instances of YPSI will be between pupils and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing of the nude or semi-nude images. These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered money or gifts.
- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

Financially motivated incidents

Financially motivated incidents of YPSI involving adults may also be called **"sextortion"**, where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, e.g. paying money. In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
- Use images that have been stolen from the child or young person, e.g. via hacking.
- Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing sexual images first.
- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked in order to obtain images, personal information, and contacts.
- Being blackmailed into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.

Coordinating a response to incidents of YPSI

When responding to incidents the school will be guided by the principle of proportionality, with the primary concern at all times being the welfare and protection of any pupils involved.

To help understand an incident, the DSL will be aware and refer to guidance and frameworks such as Brook's Sexual Behaviours Traffic Light Tool to help identify when a child or young person's sexual behaviour is a cause for concern in relation to their development.

The school understands that the law surrounding the creation and sharing of the indecent imagery of children was intended to criminalise adults seeking to sexually abuse children, and not to criminalise the children themselves.

Where a YPSI incident occurs, the school will initiate the following response:

- The incident will be referred to the DSL immediately
- The DSL will hold an initial review meeting with the necessary school staff
- The DSL, and other relevant staff members if appropriate, will conduct interviews with all pupils involved
- Parents of the pupils involved will be informed as soon as possible and involved in the school's response, unless doing so would put a child at further risk of harm
- Where a child has been physically harmed, or is at risk of physical harm, the incident will be referred to children's social care and/or the police without delay
- If the incident involves child abuse imagery the police will be informed immediately after the incident has been referred to the DSL

Disclosure

All staff have a duty to recognise and refer any incidents involving YPSI and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

Staff will be made aware that a pupil who discloses that they are the subject of an incident of YPSI is likely to be embarrassed and worried about the consequences. It is likely that disclosure of their concerns within school is a last resort, and they may have already tried to resolve the issue themselves.

When a disclosure is made, staff will ensure the pupil is feeling comfortable and that appropriate and sensitive questions are asked, in order to minimise further distress or trauma to them.

The initial review meeting

During the initial review meeting, the DSL will meet with any and all relevant staff members, and aim to establish:

- Whether there is an immediate risk to the pupil or pupils involved.
- If a referral should be made to children's social care and/or the police.
- Whether it is necessary for the DSL to view the imagery and/or message (see guidance later).
- What further information is needed to decide on the best course of action.
- Whether the imagery and/or message has been shared widely and via what services or platforms, e.g. on social media.

- Whether immediate action needs to be taken to delete or remove images and/or messages from devices or other platforms.
- If there are any relevant facts about the pupils involved that need to be considered when conducting assessment of risk.
- If any other schools, colleges, settings or individuals need to be contacted.
- How parents will be informed and involved in the school's response.

Assessment of risk

Assessing risk will be aided by considering behaviour and the motivations involved in the incident. These can be wide-ranging and move fluidly along a continuum from normal to violent and abusive behaviours. The school will always take into account that isolated inappropriate or problematic behaviour may not always be indicative of a pupil's overall sexual behaviour.

The school will use the DfE guidance to define and assess incidents according to individual motivations. Incidents may be described as:

- **Aggravated** – incidents involving abusive elements beyond the creation, sharing or possession of YPSI, or involving adult criminal behaviour. These can be further sub-categorised into:
    - **Adult involved:** involving sexually and/or financially motivated incidents.
    - **Youth only - intent to harm:** arising from inter-personal conflict.
    - **Youth only - reckless misuse:** pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result.
- **Experimental** – incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can further be subcategorised into:
    - **Romantic:** whereby young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair.
    - **Sexual attention seeking:** it is important to note that incidents within this category can be a part of normal childhood. A young person should not be blamed for taking and sharing their image.
    - **Other:** cases that do not appear to have aggravating elements, but also do not fit into the Romantic or Attention Seeking sub-types, such as for a young person's self-use, or pre-adolescent pupils (age 9 or younger) who did not appear to have sexual motives.

The DSL will make an immediate referral to CSCS and/or police if, at the initial review stage, it is determined that:

- The incident involves an adult or is suspected to involve an adult posing as another child.
- A pupil has been coerced, blackmailed, or groomed, or if there are concerns about their ability to provide consent.
- What the school knows about the incident suggests the content depicts sexual acts that are unusual for the pupil's developmental stage.

- The image involves sexual acts and the pupil in the imagery is under the age of 13.
- The image shows violence.
- The school has reason to believe that a pupil is at immediate risk of harm as a result of the image and/or message being shared.

Where none of the criteria above apply, the DSL, in conjunction with the headteacher, will determine the appropriate response and may choose not to involve children's social care or the police; however, if further information comes to light, the DSL may decide to escalate the incident at any stage.

The DSL will only decide not to refer the case to CSCS and/or the police if they are confident that the risks can be managed effectively by the school. The best interests of the pupils involved, and their welfare, will be central to the DSL's decision.

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When assessing risk, the DSL will seek to ascertain the answers to the following questions:

- Why was the image shared
- Was it consensual or was the pupil coerced or put under pressure to produce it
- Has the image been shared beyond its intended recipient
- Was it shared without the consent of the pupil who produced the image
- Has the image has been shared on social media or elsewhere online
- What steps have been made to contain the spread
- How old are the pupils involved
- Did the pupil send the image to more than one person
- Are there any concerns about the pupil's vulnerability
- Are there any additional concerns if the parents are informed of the incident

The DSL will always use their professional judgement in conjunction with that of their colleagues when assessing incidents. When considering the information gained, they will decide whether:

- A child is at risk of harm, in which case a referral will be appropriate.
- Additional information or support is needed from other agencies.
- The school can manage the incident and support any pupil directly.

If a pupil has shared an image and/or message consensually, and there is no intended malice, the school will resolve the incident directly, without involvement from other stakeholders. If a pupil has shared an image, message or video as a result of interpersonal conflict such as break-ups or fights, the incident will be managed in line with the school's Behaviour Policy.

Supporting pupils involved in incidents

Once the school have assessed that a pupil is not at immediate risk, the DSL will have a conversation with them to decide on the best course of action. The school is aware that it is important for the pupil to be given a sense of control over the reporting process and, where possible, will be given the option

of speaking with a different member of staff if they feel more comfortable doing so. In these cases, the DSL will support the member of staff to make sure the conversation is handled appropriately, and they feel confident in discussing the incident.

The purpose of the conversation will be to:

- Identify, without viewing wherever possible, what the image contains and whether anyone else has been involved.
- Find out whether the image has been shared between two people or shared further, if known.
- Discuss what actions and support might be needed, including preventing further distribution.

During this discussion the DSL will:

- Reassure them that they are not alone, and that the school will do everything they can to help and support them.
- Inform them that staff recognise the pressures that pupils can be under to take part in sharing an image and, if relevant, that support can be offered to their parents to understand the wider issues and motivations around this.
- Reassure them that they will be kept informed throughout the process.
- Remain solution-focused and avoid any victim-blaming questions such as 'why have you done this?'
- Help them understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the images.
- Discuss issues of consent and trust within healthy relationships.
- Explain the law on the sharing of indecent imagery, and that the law is in place to protect pupils rather than criminalise them.
- Advise them on useful tools that can be used to report and remove images online, such as:
    - The Internet Watch Foundation (IWF) and Childline's Report Remove tool
    - The National Center for Missing & Exploited Children's (NCMEC) Take It Down tool which can be used to help them anonymously remove images that have yet to be shared online but they think might be.

In addition to these discussions, the DSL will also advise pupils on the appropriate course of action depending upon the circumstances and context of the incident, as set out below:

For **pupils who have had their nudes or semi-nudes shared publicly**, the DSL will advise them:

- To delete images or videos from social media accounts, including from cloud photo backups, if they have uploaded them themselves.
- To use the available tools to report and remove images online, as detailed above.
- How to report sexual images or videos on individual sites to get them taken down.
- To contact their mobile phone operator and have their number changed to stop others from contacting them, where appropriate.
- To speak to the school if they are concerned about any bullying behaviour.

For **pupils who have been sent a nude or semi-nude**, the DSL will advise them:

- On the importance of reporting it online if it has been shared.
- To delete it from their devices and accounts.
- On the importance of not sharing the image further.
- That, if they asked to receive the photos, explain that they should not put pressure onto others to do things that they are uncomfortable with.

For **pupils who have shared another pupil's or young person's nudes or semi-nudes**, and for **pupils who have created a nude or semi-nude of another pupil and shared it**, the DSL will advise them:

- On the laws surrounding the sharing of indecent imagery.
- That the laws surrounding it apply to digitally manipulated and AI-generated imagery.
- To delete images or videos from social media accounts, including from cloud photo backups.
- To use the available tools to report and remove images online, as detailed above.
- How to report sexual images or videos on individual sites to get them taken down.

Informing and supporting parents

The school will inform parents of an incident at the earliest available opportunity, unless informing them will put a child at risk of harm. Any decision not to inform the parents will be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.

The DSL will support pupils involved with determining the best approach for informing parents and allow them to be a part of this process if they want to be.

When working with parents, school staff will be mindful of the sensitive and emotive nature of these incidents. In all situations the school will ensure that parents are:

- Given information about the sharing of nudes and semi-nudes, what they can expect to happen next, and who will be their link person within the education setting.
- Given support to deal with their own feelings of upset and concern, including signposting to further resources that can help them to understand the sharing of nudes and semi-nudes or support services they can contact, where appropriate.
- Given support on how to speak to their pupil about the incident.
- Advised on the law around the sharing of nudes and semi-nudes.
- Kept updated about any actions that have been taken or any support that their child is accessing, unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision.
- Informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened. This could include speaking to a Childline counsellor online or on 0800 11 11, in house counselling services where available, or a GP. If they are concerned that their child is suicidal, they should contact 999.

- Directed to the National Crime Agency - Child Exploitation and Online Protection (NCA-CEOP) if the child discloses any further details to them that may suggest they are being groomed or sexually exploited.

In addition to these discussions, the DSL will also advise parents on the appropriate course of action depending upon the circumstances and context of the incident their child is involved with, as set out below:

For **parents whose child has had their nudes or semi-nudes shared publicly**, the DSL will advise them:

- To stay calm and refrain from getting angry with their child.
- To help their child delete images or videos from social media accounts, including from cloud photo backups, if they have uploaded them themselves.
- Support their child to use the available tools to report and remove images online, as detailed above.
- To report sexual images or videos on individual sites to get them taken down.
- To contact their mobile phone operator and have their number changed to stop others from contacting them, where appropriate.
- To speak to the school if they are concerned about any bullying behaviour.
- To seek further medical advice and support if there have been similar incidents or they are worried about inappropriate sexual behaviour for their age.

For **parents whose child has been sent nudes and semi-nudes**, the DSL will advise them:

- To listen to their child's concerns without criticising their decisions.
- To help their child delete images or videos from social media accounts, including from cloud photo backups.
- To consider ways that their child could speak to the sender to stop future correspondences or if the child prefers, how to block the sender.
- To report sexual images or videos on individual sites to get them taken down.
- How to discuss with their child issues of consent and trust within healthy relationships.

For **parents whose child has shared another child's nudes or semi-nudes**, the DSL will advise them:

- To stay calm and refrain from getting angry with their child.
- How to discuss with their child issues of consent and trust within healthy relationships.
- To contact the school and/or seek further medical advice and support if they are concerned that their child is behaving in a sexually inappropriate way, or if similar incidents have previously occurred.

Multi-agency working

The school will develop trusting relationships between families and agencies to protect the welfare of its pupils and collaborate with services to achieve shared goals and share information.

In circumstances where a referral is appropriate to any external agency, such as police or social care the school will follow the provisions on managing referrals and multi-agency working set out in the Child Protection and Safeguarding Policy.

The school recognises the importance of proactive information sharing between professionals and local agencies and will be aware that data protection regulations do not act as a barrier to sharing information where failure to do so would result in pupils being placed at risk of harm.

Searching devices, viewing, and deleting indecent imagery

In all situations staff will be made aware of their statutory responsibilities and powers and will adhere to the provisions set out in the school's Searching, Screening and Confiscation Policy.

Viewing the imagery

Staff and parents will not intentionally view any sexual images or video unless there is good and clear reason to do so. Wherever possible, responses to incidents will be based on what the DSL has been told about the content of the imagery.

All members of staff will be made aware of what they can and can't do in relation to viewing sexual images and will be expected to communicate this to any pupil or parent requesting that imagery be viewed.

The decision to view any imagery will be based on the professional judgement of the DSL and will always comply with the school's Child Protection and Safeguarding Policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to any pupil or involved.

The DSL will only make a decision to view imagery if it is:

- The only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any pupil or young person involved.
- Necessary to report it to a website, app or suitable reporting agency, such as the IWF, to have it taken down, or to support the child or parent or carer in making a report.
- Unavoidable because a child has presented it directly to a staff member or nudes or images have been found on any school devices or network.

Staff will not view any imagery and will instead report it to the DSL. Where it is necessary to view the image, the DSL will first discuss the decision with the headteacher, and will:

- Not copy, print, share, store or save the imagery, as this is illegal. If this has already happened, the school will contact local police for advice and to explain the circumstances.
- Ensure viewing is undertaken by themselves or another member of the safeguarding team with permission from the headteacher.
- Ensure the viewing takes place with another member of staff in the room – usually the headteacher.

- Ensure viewing takes place on the school premises, wherever possible, and in a private space, such as the headteachers office.
- Ensure that images are viewed by an individual of the same sex as the pupil in the image, wherever possible.
- Record the viewing of the imagery in the school's safeguarding records, including the following information:
    - Who was present
    - Why the image was viewed
    - Any actions taken as a result of the image being viewed
    - Ensure these records are signed and dated by the staff members present
- Confiscate any devices, where appropriate, and take the following actions:
    - Disconnect the device from Wi-fi and data
    - Turn the device off
    - Place the device in a secure place
    - Pass the device on to police, where necessary.

The school is aware that viewing indecent imagery can be distressing for both pupils and adults. If indecent images have been viewed by a member of staff in the course of their duties the school will ensure that the staff member is provided with the appropriate emotional support.

Deletion of imagery

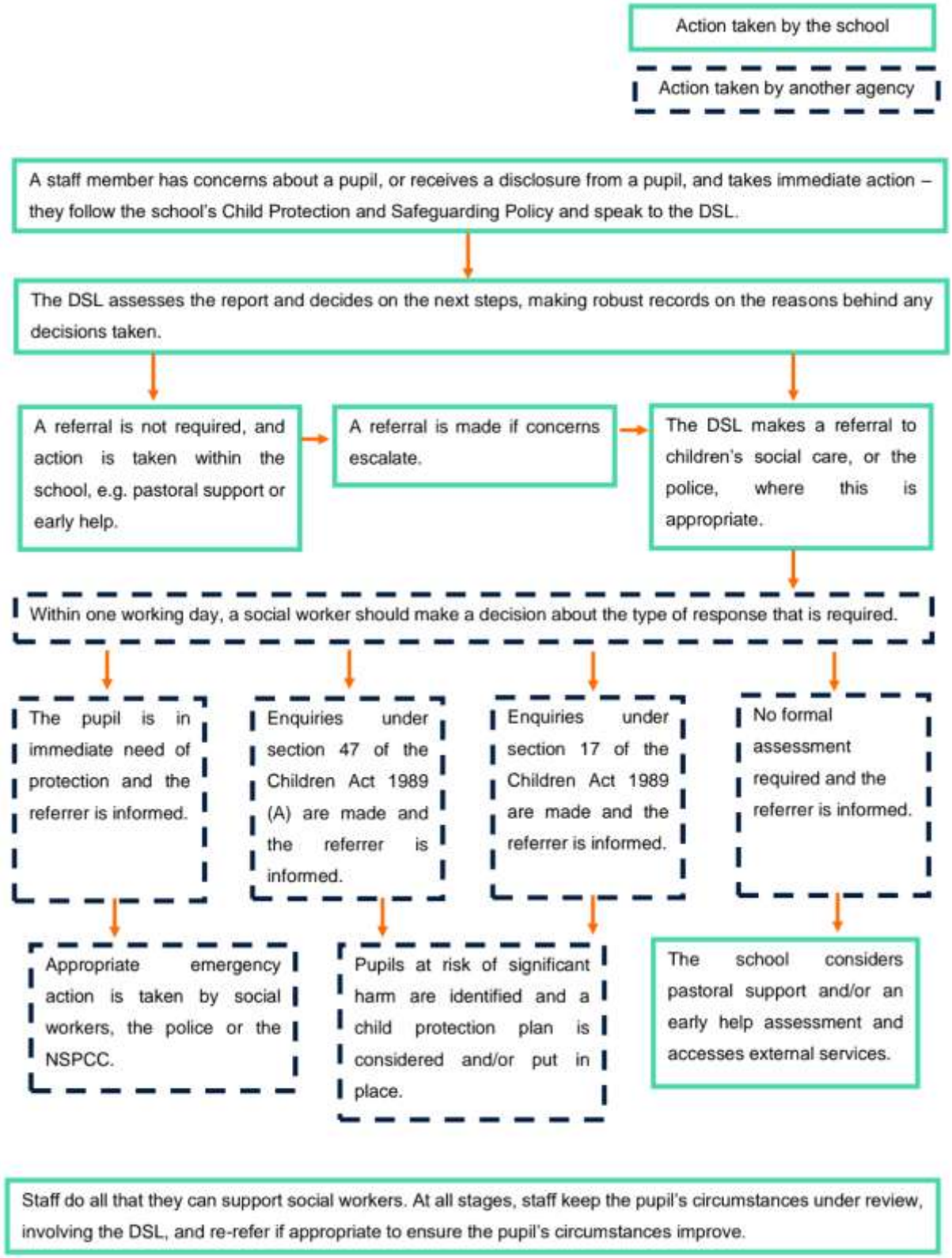
If a decision has been made not to make a referral to the police and/or CSCS the school will take the lead in resolving the incident and deleting any indecent imagery from devices and online platforms to limit any future sharing.

For incidents that have not been reported to police or children's social care, the school will record the reasons for not doing so and ensure this is signed off by the headteacher.

The school will also take the following actions:

- Remind the pupil that possession of nudes and semi-nudes is illegal
- Ask them to delete the imagery and to confirm that they have deleted them
- Give them a deadline for deletion across all devices, online storage, or social media sites
- Inform them that if they refuse or it is later discovered they did not delete the imagery, they are continuing to commit a criminal offence and the police may become involved
- Record all decisions, including times, dates and reasons for decisions made and log these in the safeguarding records
- Inform parents about the incident and actions being taken, unless this presents a further risk to any pupil

APPENDIX V: REPORTING SAFEGUARDING CONCERNS FLOWCHART



Equality Impact Assessment Form

People responsible for overseeing the EIA
Sara Crute Mussell (Inclusion Director & Safeguarding & Inclusion Lead)
Name of the policy, procedure or project
Child Protection & Safeguarding Policy (DET)
What is the main purposes or aims of the policy, procedure or project?
To identify child protection procedures and safeguarding themes within Trust schools and outline how each theme will be safeguarded at a school level.
Who will be the beneficiaries of the policy, procedure or project?
All staff, learners, Trustees, governors and families as it is regarding child protection & safeguarding.
Have you consulted on this policy, procedure or project?
Yes. DSLs and Trustees have been consulted with regards this policy and it is based on a template provided by SchoolBus and takes into account all changes in KCSIE.

Complete the following table and give reasons/comments for where:

The policy, procedure or project could have a positive impact on any person or group because of one of the following aspects of their identity (this includes equality of opportunity of access)

The policy, procedure or project could have a negative impact on, or disadvantage, a person or group because of one of the following aspects of their identity.

(At this stage, it is important to consider the requirements placed upon a school as per the Equality Act 2010.)

Groups	Positive impact		Negative impact		Comments
	High	Low	High	Low	
Race	x				Within principles and aims policy is committed to all children having equal rights to support and protection irrespective of race, age, ability, gender, language, religion, sexual orientation and culture.
Religion or belief	x				As above.
Sexual orientation	x				As above. Also LGBTQ+ has a dedicated section within the policy. Increased focus in KCSIE
Sex	x				As above. Also mentioned within following safeguarding themes- CSE, Domestic abuse, FGM, Forced marriage, Child-on-child abuse
Disability	x				As above, Also SEND mentioned in following headings- Early help, home educated children, private

					fostering, training, forced marriage, YPSI
Age	x				As with race
Gender reassignment	x				As with sexual orientation
Pregnancy and maternity	x				As above.
Marriage and civil partnership	x				As above.

Where there is negative impact, what actions could be taken to amend the policy, procedure or project to minimise the negative impact?
n/a
If there is no evidence that the policy, procedure or project promotes equality, equal opportunities or improves relationships between people with different protected characteristics, what amendments could be made to achieve this?
n/a
How will the policy, procedure or project be implemented including any necessary training?
Policy will be ratified by DET Trustees and then shared with each school for adoption. All DET staff will read the policy annually and complete annual Safeguard Training (as a minimum) which includes reference to KCSIE and this policy.