

DISCOVERY
EDUCATIONAL TRUST

Safeguarding and Child Protection Policy

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Key Safeguarding Contacts

Chase High School (CHS)	
Designated Safeguarding Lead (DSL)	Mr. Matthew Lewis Email: mlewis@discoveryeducationaltrust.co.uk Telephone: 01702 354441
Deputy Designated Safeguarding Lead (DDSL)	Mr. Ashley Brien Email: Ashley.brien@chasehigh.org Telephone: 01702 354441
DDSL and Safeguarding Manager	Ms. Michelle Beckman Email: michelle.beckman@chasehigh.org Telephone: 01702 354441
Headteacher	Mr. Matthew Suttwood Email: matt.suttwood@chasehigh.org Telephone: 01702 354441
Chair of the CHS Local School Committee (LSC)	Mr. Sundeep Bamra Email: sbamra@discoveryeducationaltrust.co.uk Telephone: 01702 354441
Safeguarding Link Governor	Mr. Sundeep Bamra Email: sbamra@discoveryeducationaltrust.co.uk Telephone: 01702 354441
SLT Digital Lead	Colin Brodigan Email: colin.brodigan@chasehigh.org Telephone: 01702 354441
Designated Teacher for Looked After and Previously Looked After Children (LAC)	Mrs. Daisy Ringrose and Mrs. Emma Wright Email: daisy.ringrose@chasehigh.org emma.wright@chasehigh.org Telephone: 01702 354441
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Designated Safeguarding Lead (DSL) (including EYFS provision)	Mr. Robert Watson Email: head@hogarth.essex.sch.uk

	Telephone: 01277 212216
Deputy Designated Safeguarding Lead (DDSL)	Ms. Lauren King Email: lking@hogarth.essex.sch.uk Telephone: 01277 212216
Headteacher	Mr. Robert Watson Email: head@hogarth.essex.sch.uk Telephone: 01277 212216
Chair of the HPS LSC	Ms. Melissa Steingass Email: msteingass@discoveryeducationaltrust.co.uk Telephone: 01277 212216
Safeguarding Link Governor	Ms. Marianne Pearson Email: mpearson@discoveryeducationaltrust.co.uk Telephone: 01277 212216
SLT Digital Lead	Mr. Robert Watson Email: head@hogarth.essex.sch.uk Telephone: 01277 212216
Designated Teacher for Looked After and Previously Looked After Children (LAC)	Ms. Lauren King Email: lking@hogarth.essex.sch.uk Telephone: 01277 212216

Kelvedon Hatch Community Primary School (KHCPS)	
Designated Safeguarding Lead (DSL) (including EYFS provision)	Miss Victoria Townsend Email: head@kelvedonhatch.essex.sch.uk Telephone: 01277 372341
Deputy Designated Safeguarding Lead (DDSL)	Mrs. Clare Connor Email: cconnor@kelvedonhatch.essex.sch.uk Telephone: 01277 372341
Headteacher	Miss Victoria Townsend Email: head@kelvedonhatch.essex.sch.uk Telephone: 01277 372341

Chair of the KHCPs LSC	Mr. Lee Raftery Email: lraftery@discoveryeducationaltrust.co.uk Telephone: 01277 372341
Safeguarding Link Governor	Mr. Lee Raftery Email: lraftery@discoveryeducationaltrust.co.uk Telephone: 01277 372341
SLT Digital Lead	Mrs. Clare Connor Email: cconnor@kelvedonhatch.essex.sch.uk Telephone: 01702 372341
Designated Teacher for Looked After and Previously Looked After Children (LAC)	Ms. Althea Chalkley Email: sendco@kelvedonhatch.essex.sch.uk Telephone: 01277 372341

Larchwood Primary School (LPS)	
Designated Safeguarding Lead (DSL) (including EYFS provision)	Mrs. Dawn Jaycock Email: djaycock@larchwood.essex.sch.uk Telephone: 01277 372450
Deputy Designated Safeguarding Lead (DDSL)	Mr. Steve Bowsher Email: head@larchwood.essex.sch.uk Telephone: 01277 372450
Headteacher	Mr. Steve Bowsher Email: head@larchwood.essex.sch.uk Telephone: 01277 372450
Chair of the LPS LSC	Mrs. Rachel Fossey Email: rfossey@discoveryeducationaltrust.co.uk Telephone: 01277 372450
Safeguarding Link Governor	Ms. Gillian Walsh Email: gwalsh@discoveryeducationaltrust.co.uk Telephone: 01277 372450
SLT Digital Lead	Mr. Steve Bowsher Email: head@larchwood.essex.sch.uk

	Telephone: 01277 372450
Designated Teacher for Looked After and Previously Looked After Children (LAC)	Mrs. Dawn Jaycock Email: djaycock@larchwood.essex.sch.uk Telephone: 01277 372450

St. Martin's School (SMS)	
Designated Safeguarding Lead (DSL)	Mrs. Georgina Tatman Email: gtatman@st-martins.essex.sch.uk Telephone: 01277 238300
Deputy Designated Safeguarding Lead (DDSL)	Mrs. Gaynor Wilson Email: gwilson@st-martins.essex.sch.uk Telephone: 01277 238300
Headteacher	Mr. Jamie Foster Email: jfoster@st-martins.essex.sch.uk Telephone: 01277 238300
Chair of the SMS LSC	Mr. Des Shillingford Email: dshillingford@discoveryeducationaltrust.co.uk Telephone: 01277 238300
Safeguarding Link Governor	Mrs. Cynthia Amo-Ameyaw Email: camo-ameyaw@discoveryeducationaltrust.co.uk Telephone: 01277 238300
SLT Digital Lead	Mrs. Georgina Tatman Email: gtatman@st-martins.essex.sch.uk Telephone: 01277 238300
Designated Teacher for Looked After and Previously Looked After Children (LAC)	Mrs. Gaynor Wilson Email: gwilson@st-martins.essex.sch.uk Telephone: 01277 238300

Chair of Trust Board (TB)	Mrs. Helen Witty Email: hwitty@discoveryeducationaltrust.co.uk
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	Telephone: 01277 238300
Specialist Safeguarding Trustee	Mr. Frazer Ferguson Email: fferguson@discoveryeducationaltrust.co.uk Telephone: 01277 238300

Key External Contacts

<p>Essex County Council Local Authority (LA) Designated Officer(s) (LADO)</p>	<p>Telephone: 03330 139 797 Email: lado@essex.gov.uk</p>
<p>Southend-on-Sea City Council LADO</p>	<p>Telephone: 01702 534591 Email: safeguardingforchildren@southend.gov.uk</p>
<p>Essex County Council Children's Social Care Department¹</p>	<p>Telephone: 0345 603 7627 Website: Request support or report a concern about a child (essex.gov.uk). Out of hours emergency telephone: 0345 606 1212 Duty team telephone: 0345 603 7627</p>
<p>Southend-on-Sea City Council Children's Social Care Department</p>	<p>Telephone: 01702 215007 Email: mash@southend.gov.uk Out of hours emergency telephone: 0345 606 1212 Duty team telephone: 01702 215007 – Option 1</p>
<p>Essex County Council Safeguarding Partners – Essex Safeguarding Children Board (ESCB)</p>	<p>Website: ESCB - Home Telephone: 0345 603 7627 Email: escb@essex.gov.uk</p>
<p>Southend-on-Sea City Council Safeguarding Partners – Southend Clinical Commissioning Group; Southend-on-Sea City Council</p>	<p>Website: https://safeguardingsouthend.co.uk/ Telephone: 01702 534706 Email: SSPC@southend.gov.uk</p>
<p>Female Genital Mutilation (FGM) reporting - non-emergency police contact number</p>	<p>101</p>

<p>CHS - Prevent Duty partners and advice about extremism</p>	<p>Channel Police Practitioner Name: Dan Potter Telephone: 07736 952396 Email: dan.potter@beds.police.uk</p> <p>Channel Local Authority Chair Name: Matthew Harding and Richard Meads Email: matthewharding@southend.gov.uk richardmeads@southend.gov.uk</p> <p>Non-emergency DfE advice telephone: 020 7340 7264 Email: counter-extremism@education.gsi.gov.uk</p>
<p>HPS/KHCPS/LPS/SMS - Prevent Duty partners and advice about extremism</p>	<p>Channel Police Practitioner Name: Jo Barclay Telephone: 03330 232078 Email: jo.barclay@essex.gov.uk</p> <p>Channel Local Authority Chair Name: Jo Barclay Telephone: 03330 232078 Email: jo.barclay@essex.gov.uk</p> <p>Non-emergency DfE advice telephone: 020 7340 7264 Email: counter-extremism@education.gsi.gov.uk</p>
<p>UK Safer Internet Centre</p>	<p>Telephone: 0344 381 4772 Email: helpline@saferinternet.org.uk</p>
<p>NSPCC whistleblowing helpline</p>	<p>Weston House 42 Curtain Road London EC2A 3NH</p> <p>Telephone: 0800 028 0285 Email: help@nspcc.org.uk https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/</p>
<p>Reporting serious wrongdoing to the Education and Skills Funding Agency</p>	<p>For further guidance, please refer to: https://www.gov.uk/guidance/how-esfa-handles-whistleblowing-disclosures</p>

<p>Report Abuse in Education helpline</p>	<p>A dedicated helpline for children and young people, who have experienced abuse at school, and for worried adults and professionals that need support and guidance, including for non-recent abuse.</p> <p>Telephone: 0800 136 663</p> <p>Email: help@nspcc.org.uk</p>
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1 Aims

- 1.1 This is the Safeguarding and Child Protection Policy and procedures of Discovery Educational Trust (DET) and its Schools.
- 1.2 The aims of this Policy are as follows:
 - 1.2.1 to actively promote the wellbeing of pupils²;
 - 1.2.2 to safeguard and promote the welfare of children, staff and others, who come into contact with the Trust and its Schools, and to protect them from harm;
 - 1.2.3 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and/or allegations of abuse, neglect and/or exploitation;
 - 1.2.4 to raise awareness about how to report concerns and how they will be investigated, whether they are current or historic in nature;
 - 1.2.5 to raise staff awareness about DET and its Schools' safeguarding expectations;
 - 1.2.6 to ensure that staff are competent to carry out their safeguarding responsibilities and feel supported in this role;
 - 1.2.7 to ensure consistent good safeguarding practice throughout DET and its Schools to include the promotion of a zero-tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it, and staff are confident to identify and respond to it; and
 - 1.2.8 to promote a whole-School culture of safety, equality and protection.
- 1.3 Every pupil should feel safe and protected from any form of abuse, neglect and exploitation.
- 1.4 All staff should understand the indicators of abuse, neglect and exploitation and understand specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks for DET and its Schools and their communities are detailed in Appendix 1.
- 1.5 Members of the DET/School community (including alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, that the matter will be handled sensitively and that appropriate action taken.
- 1.6 Anyone about whom a concern is raised should feel confident that they will be supported and the matter will be handled sensitively and that appropriate action will be taken.
- 1.7 This Policy forms part of DET's whole-School approach to promoting child safeguarding and wellbeing, which seeks to involve everyone in the Trust to ensure that the best interests of pupils underpin and are at the heart of all decisions, systems, processes and policies.
- 1.8 Although this Policy is necessarily detailed, it is important to DET and its Schools that safeguarding policies and procedures are transparent, clear and easy to understand for staff, pupils and Parents. DET and its Schools welcome feedback on how they can continue to improve their policies.

² This wording reflects the requirements in part 8 paragraph 34 of the ISSR. Well-being means well-being within the meaning of section 10(2) of the Children Act 2004(a): the physical and mental health and emotional well-being; protection from harm and neglect; education training and recreation; contribution made by pupils to society; social and economic well-being.

2 Scope and Application

- 2.1 This Policy applies to all DET Schools, including, where relevant, the Early Years Foundation Stage (**EYFS**) and Sixth Form.
- 2.2 This Policy applies to all registered pupils whether they are under or over 18 years with adjustments, as appropriate, to reflect their age.
- 2.3 This Policy applies at all times, including where pupils or staff are away from the School site, whether they are on School-arranged activities or otherwise, and whether or not the School is open. It will, therefore, apply out-of-School hours and in the holidays.
- 2.4 This Policy applies to core School activities and to out-of-hours (including commercial, for example lettings) activities.
- 2.5 This Policy is designed to address:
- 2.5.1 the specific statutory obligations of DET to safeguard and promote the welfare of children;
 - 2.5.2 The TB charity law safeguarding duty.

Safeguarding responsibilities are a key governance priority for Trustees and everyone. The Trustees are committed to all DET Schools being safe and trusted environments.

Everyone must take reasonable steps to protect those, who come into contact with the Trust through its work, from harm. This includes pupils, anyone else who benefits from the DET and its Schools' work, staff, volunteers, Parents or anyone else, who comes into contact with DET and its Schools through their work.³

3 Definitions

- 3.1 Where the following words or phrases are used in this policy:
- 3.1.1 References to **Parent** or **Parents** means the natural or adoptive Parents of the pupil (irrespective of whether they are or have ever been married, with whom the pupil lives, or whether they have contact with the pupil) as well as any person, who is not the natural or adoptive Parent of the pupil, but who has care of, or Parental responsibility for, the pupil (e.g. foster carer / legal guardian).
 - 3.1.2 References to **school days** means Monday to Friday, when the School is open to pupils during term time. The dates of terms are published on each School's website.
 - 3.1.3 **Safeguarding** is the protection of people from harm.
 - 3.1.4 **Safeguarding and promoting the welfare of children** is defined in KCSIE 2025 as:
 - (a) Providing help and support to meet the needs of children as soon as problems emerge;
 - (b) protecting children from maltreatment, whether that is within or outside the home, including online;

³ Even where the Academy may not strictly have a duty of care, it will still need to think about steps to address the risk of harm.

- (c) preventing impairment of children's mental and physical health or development;
- (d) ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- (e) taking action to enable all children to have the best outcomes.

3.1.5 Child means a child under the age of 18.

3.1.6 **CSC** means Children's Social Care and includes, depending on the context, the team based in the LA where the School is located and, where appropriate, the team based in the LA where the child is a resident.

3.1.7 **DSL** means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**), where the DSL is unavailable.

3.1.8 **Designated Officer** means designated officer at the LA (often referred to as the LADO). The Designated Officer(s) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners.

3.1.9 **Local Safeguarding Partners** means the three safeguarding partners (LA, Integrated Care Board and the chief officer of police for an area, any part of which falls within the LA), who make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. The local arrangements relevant to DET Schools are detailed in Appendix 7.

3.1.10 References to **harmful sexual behaviour** in this Policy refer to problematic, abusive and violent sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult.

3.1.11 References to **children missing education (CME)** mean children of compulsory school age, who are not registered pupils at a School and are not receiving suitable education otherwise than at School. This does not include children, who are registered at a School, even if they are persistently or severely absent from that School.

3.1.12 Reference to **staff** includes all those who work for, or on behalf of, the Trust, regardless of their employment status, including contractors, supply staff, volunteers, Members, Trustees and Local Governors, unless otherwise indicated.

3.1.13 Senior Leadership Team (**SLT**) comprises of the Headteacher (HT), Deputy Headteacher(s) (DHT), Assistant Headteacher(s) (AHT) and the School Business Manager (SBM), if appropriate.

4 **Responsibility Statement and Allocation of Tasks: Schools' Approach to Safeguarding Leadership**

4.1 In all Academy Trusts, the TB is responsible for the safeguarding arrangements of its School/s.

- 4.2 In a multi-academy trust, the TB may choose to delegate certain safeguarding functions to a local governing body (Local School Committee (LSC)) under a scheme of delegation. The Trust cannot delegate its legal responsibilities for safeguarding to a LSC.
- 4.3 The TB has overall responsibility for all matters, which are the subject of this Policy including:
- 4.3.1 specific responsibilities as described in Part 2 of KCSIE. Legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of pupils at the School, having regard to relevant guidance issued by the Secretary of State;
 - 4.3.2 strategic leadership responsibility for the Schools’ safeguarding arrangements; and
 - 4.3.3 specific responsibilities to facilitate a whole-School approach to safeguarding, set out in more detail in Part 2 of KCSIE.
- 4.4 The TB:
- 4.4.1 appoints a Specialist Safeguarding Trustee, whose contact details are set out in the contacts detail at the front of this Policy;
 - 4.4.2 ensures that all members of the TB and LSCs receive appropriate safeguarding and child protection (including online) training, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance;
 - 4.4.3 ensures that it discharges its legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have;
 - 4.4.4 ensures that appropriate arrangements are in place for the whole TB to discharge its function, including appropriate consideration of safeguarding matters at TB meetings and a holistic annual review of safeguarding. This is the role of the Specialist Safeguarding Trustee; and
 - 4.4.5 establishes appropriate delegation arrangements at School-level, led by the HT and DSL, to enable the School to discharge its safeguarding duties effectively.
- 4.5 To ensure the efficient discharge of its responsibilities under this Policy, the TB has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the Policy up to date and compliant with the law and best practice	Director of Education – Pastoral; and Director of Operations	As required, and, at least, termly
Monitoring the implementation of the Policy, relevant risk assessments and any action taken in response and evaluating effectiveness	HT	As required, and, at least, termly
Seeking input from interested groups (such as pupils, staff,	HT	As required, and, at least, annually

Task	Allocated to	When / frequency of review
Parents) to consider improvements to the School's processes under the Policy		
Assessing the adequacy of safeguarding arrangements for those who use or hire premises	Trust Estates Manager; and CFOO	Before commencement of arrangement and thereafter, at least, annually
Formal annual review of the School's safeguarding policies and procedures and their implementation	Director of Education – Pastoral; and Safeguarding Link Trustee	As a minimum annually, and as required
Overall responsibility for content and implementation	DET	As a minimum annually

4.6 Headteacher

- 4.6.1 The HT is responsible for the overall management of the School and for the management of concerns and allegations about staff.
- 4.6.2 The HT ensures that the DET and School's policies and procedures, adopted by the TB and the LSC (particularly those concerning referrals of cases of suspected abuse and neglect) are understood, and followed by all staff.

4.7 Designated Safeguarding Lead (DSL)

- 4.7.1 The DSL is a senior member of staff of the School's SLT. They have overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) throughout the School.
- 4.7.2 If the DSL is unavailable, the activities of the DSL will be undertaken by the DDSL. The main responsibilities of the DSL are detailed in Annex C of KCSIE. These include, but are not limited to, providing advice and support to other staff on child welfare and child protection matters, participating in strategy discussions and inter-agency meetings (and/or to support other staff to do so) and contributing to the assessment of children.
- 4.7.3 The DSL takes lead responsibility for safeguarding children in the School's early years setting and is responsible for liaising with local statutory children's services agencies and with the **Local Safeguarding Partners.**]
- 4.7.4 The DSL will also liaise with the HT to inform them of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles to whom the provisions of PACE Code C and any other code of practice apply.
- 4.7.5 All DET Schools have a designated member of staff, who assumes lead responsibility for pupils who are looked after or previously looked after children. This member of

staff will liaise closely with the DSL should there be any safeguarding or child protection concerns for these pupils.

- 4.7.6 All DET Schools have, at least, one Mental Health First Aider, who is responsible for developing a holistic approach to promoting and supporting the mental wellbeing of pupils and staff.
- 4.7.7 All DET Schools have a designated member of staff/team that acts as attendance champion with overall responsibility for pupil attendance and for liaising with pupils, Parents and external agencies in that regard.
- 4.7.8 The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. DDSLs will be trained to the same standard as the DSL. The DSL's training will be updated formally, at least, every two years, but their knowledge and skills will be updated, at least, annually through a variety of methods at regular intervals.

5 Specific Safeguarding Duties in relation to Children

- 5.1 Safeguarding and promoting the welfare of children is **everyone's** responsibility.
- 5.2 DET and its Schools are committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. DET and its Schools require everyone, who comes into contact with children and their families, to share this commitment.
 - 5.2.1 The Schools will:
 - (a) understand its role in the safeguarding partner arrangements and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements implemented by the LA Safeguarding Partners, the key details of which are contained in Appendix 7;
 - (b) be alert to signs of abuse whether in School, within the child's family or from outside, and take immediate steps to protect individuals from any form of abuse, neglect or exploitation, whether from an adult or another child;
 - (c) include opportunities within the curriculum for children to develop the skills they need to recognise, and stay safe from abuse;
 - (d) promote the systems in place for children to confidentially report abuse, ensuring that they know their concerns will be treated seriously, they can safely express their views and give feedback;
 - (e) take active steps to promote, monitor and analyse School attendance;
 - (f) allow staff to determine how best to build trusted relationships with pupils, which facilitate communication within the parameters of the DET Staff Code of Conduct;
 - (g) deal appropriately with every suspicion or complaint of abuse and support children, who have been abused, in accordance with appropriate education, child protection and/or welfare plans;
 - (h) design and operate procedures which, so far as possible, ensure that staff, pupils and others are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;

- (i) prepare staff to identify children, who may experience vulnerability⁴ and may benefit from Early Help, and encourage them to be particularly alert to the potential need for Early Help for children with the indicators listed in KCSIE or WTSC;
- (j) be alert to children, who are at potentially greater risk of harm (both online and offline). Refer Section 11 below.
- (k) consider and develop procedures to deal with any other safeguarding issues, which may be specific to individual pupils in the School or in the local area. See Appendix 7 - Local Arrangements for more details.

5.3 Staff may follow the DET Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the Trust/School or potential failures by the Trust/School or their staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC Whistleblowing Helpline is available for staff, who do not feel able to raise concerns about child protection failures internally (refer to the Key and External Contact detail at the front of this Policy for the relevant contact details). Staff may also report concerns direct to the School's LA or to the DfE if they consider that the Trust/School has failed to deal with concerns appropriately.

6 Pupils aged 18 or over

6.1 The School's safeguarding responsibilities extend to all members of the School community, and its safeguarding policies, procedures, and codes of conduct apply to all pupils, including those aged 18 or over.

The School acknowledges its duty of care to these pupils and the need to consider their specific needs and rights, as well as the need to manage any risk that they may present to others. Where a pupil, who is aged 18 or over, presents safeguarding concerns, may be an "adult at risk" under the provisions of the Care Act 2014. Appropriate safeguarding procedures will be followed, which may include referral to the LA's safeguarding adults' board.

7 Reporting Obligations of Staff

7.1 Reporting obligations generally

7.1.1 Staff members should maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the **best** interests of the pupil.

7.1.2 Staff should 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, for example, a child may feel embarrassed, humiliated, or threatened due to their vulnerability, disability and/or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children, who may be in need of help or protection.

7.1.3 All staff have a duty to:

⁴ This wording has been inserted to reflect the findings of the National Children's Bureau's research 'From Trait to State' in relation to the concept of vulnerability and reflect the approach taken in care provision

- (a) report any concerns that they may have about the safety and/or wellbeing of pupils;
- (b) report any concerns that they may have about the safety and/or wellbeing of other persons associated with DET/its Schools;
- (c) report any safeguarding concerns about staff, or anyone else associated with DET/its Schools; and
- (d) follow up on any such reports to ensure that appropriate action is, or has been, taken.

7.1.4 The procedures for doing so are detailed below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, any member of the SLT or directly to CSC (whether the School's LA or that local to the child's home address) or the police in their absence, for guidance.

7.2 What to do if staff have a concern about a pupil's welfare

7.2.1 If staff have **any concern about a pupil's welfare**, they should follow the procedures in this Policy and report their concern to the DSL (or the DDSL in the DSL's absence) **immediately**.

- (a) See Appendix 3 below for guidance about what to do when receiving a disclosure and paragraph 23 below relating to recording a concern.

7.2.2 A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need, or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.

7.2.3 Teachers must report known cases of Female Genital Mutilation (**FGM**) to the police in consultation with the DSL. Refer to Appendix 2 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

7.2.4 If the concern involves an **allegation or concern raised about a member of staff**, supply staff, contractors or volunteers, this must be reported in accordance with the procedures set out in Appendix 5 and parts 1 and 4 of KCSIE.

7.2.5 What if the DSL is unavailable?

- (a) The DSL or the DDSL should always be available to discuss safeguarding concerns, and should be contacted in relation to any safeguarding concerns out of school hours.
- (b) If, in exceptional circumstances, the DSL and DDSL are unavailable, staff must not delay taking action. Staff should speak to their Line Manager or a member of the SLT and/or advice should be taken from CSC, whose contact details are set out at the front of this Policy.
- (c) Where a child is suffering, or is likely to suffer from harm, a referral to CSC and/or the police should be made immediately. Staff should be aware of the process for making referrals direct to CSC and/or the police in these

circumstances. This should then be shared with the DSL or DDSL, or member of the SLT, as soon as possible. Refer Section 10 below for further details on making a referral.

7.3 Action by the DSL

7.3.1 On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the appropriate Local Safeguarding Partner procedures and referral threshold document. Such action may include:

- (a) managing any support for the pupil internally via the School's own pastoral support processes, seeking advice from CSC, where required (refer Section 8 below);
- (b) undertaking an Early Help assessment (which generally requires parental consent) (refer Section 9 below); or
- (c) making a referral for statutory services (refer Section 10 below).

7.3.2 The views of the child will be taken into account when considering the appropriate course of action, but will not be determinative.

7.3.3 Where the concern relates to the welfare of a pupil, who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, CSC.

7.3.4 If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

8 Managing Support for Pupils Internally

8.1 All DET Schools have a framework for the identification, assessment, management and review of risk to pupil welfare, so that appropriate action can be taken to reduce the risks identified. Refer Section 22 below and the DET Risk Assessment Policy for Pupil Welfare.

8.2 All DET Schools will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from CSC, where necessary.

9 Early Help Assessment

9.1 Early Help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage of a child or young person's life to Parents, children or whole families, and is generally supported by CSC in consultation with the family.

9.2 DET and its Schools understand that providing Early Help is more effective in promoting the welfare of children than reacting later.

9.3 DET and its Schools' safeguarding training includes guidance about Early Help processes, and prepares all staff to identify children, who may benefit from Early Help. Staff are mindful of specific safeguarding issues and those pupils, who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for Early Help for a child who:

- 9.3.1 is disabled or has certain health conditions and has specific additional needs;

- 9.3.2 has special educational needs (whether or not they have a statutory Education, Health and Care Plan (EHCP));
 - 9.3.3 has a mental health need;
 - 9.3.4 is a young carer;
 - 9.3.5 is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
 - 9.3.6 is frequently missing/goes missing from education, home or care;
 - 9.3.7 has experienced multiple suspensions, is at risk of being permanently excluded from School and in Alternative Provision or a Pupil Referral Unit;
 - 9.3.8 is at risk of modern slavery, trafficking, sexual or criminal exploitation;
 - 9.3.9 is at risk of being radicalised or exploited;
 - 9.3.10 has a family member in prison, or is affected by parental offending;
 - 9.3.11 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
 - 9.3.12 is misusing alcohol or other drugs themselves;
 - 9.3.13 is at risk of "honour-based" abuse such as FGM or forced marriage;
 - 9.3.14 is a privately fostered child.
- 9.4 A member of staff, who considers that a pupil may benefit from Early Help, should keep a written record of their concerns and, in the first instance, discuss this with the DSL (refer Section 23 below and Appendix 3 for further guidance). The DSL will consider the appropriate action to take in accordance with the child's Safeguarding Children Partners menu of Early Help services and their referral threshold document, and will support staff in liaising with Parents and other agencies and setting up an inter-agency assessment, as appropriate.
- 9.5 If Early Help is appropriate, staff may be required to support other agencies and professionals in an Early Help assessment and will be supported by the DSL in undertaking this role.
- 9.6 The matter will be kept under review, and consideration given to a referral to CSC for assessment for statutory services if the pupil's situation appears to be getting worse, or does not appear to be improving.
- 10 Making a Referral**
- 10.1 **Where a child is suffering, or is likely to suffer from harm, or there are concerns about a child's safety or welfare, a referral to CSC, in line with local reporting procedures (and, if appropriate, the police) should be made as soon as reasonably practicable.**
- 10.2 The contact details for the Schools' CSC teams are detailed at the front of this Policy.
- 10.3 Anyone can contact the CSC to discuss concerns before a referral is made. This includes professionals as well as a child themselves, family members and members of the public. The child's local safeguarding partners will have a threshold of need framework and guidance, which will provide more information, which can support decision making in relation to contacting CSC.

10.4 Statutory Assessments

10.4.1 CSC may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

- (a) **Children in need:** *A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.* Children in need may be assessed under Section 17 of the Children Act 1989.
- (b) **Children suffering or likely to suffer significant harm:** LAs have a duty to make enquiries under Section 47 of the Children Act 1989 if they have reasonable cause to suspect that *a child is suffering, or is likely to suffer, significant harm.*

10.4.2 The threshold document published by Local Safeguarding Partners includes the criteria, including the level of need, for when a case should be referred for assessment and for statutory services under Sections 17 and 47.

10.5 Anybody can make a referral. Staff required to make a direct referral, may find the flowchart detailed on page [24] of KCSIE helpful, and the flowcharts set out in Chapter 3 of WTSC for information about the likely actions and decisions required.

10.6 Parental consent is usually expected for referrals to statutory agencies unless this may expose the child to additional harm or is not considered to be in the child's best interests as staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

10.6.1 personal details of the child, including the child's developmental needs;

10.6.2 detailed information about the concern;

10.6.3 information about the child's family and siblings, including the capacity of the child's Parents to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

10.7 If the referral is made by telephone, this should be followed up in writing.

10.8 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

10.9 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the LA within one working day. If this is not received, the DSL (or the person that made the referral) should contact CSC again.

10.10 Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves, in accordance with the procedures set out in Appendix 7.

11 Supporting Children Potentially at Greater Risk of Harm

Whilst **all** children should be protected, DET and its Schools acknowledge that some groups of children are potentially at greater risk of harm. This can include the following groups:

11.1 Children, who are absent from education

- 11.1.1 Children being absent from school, particularly repeatedly and/or for a prolonged period, and children missing education, can act as a vital warning sign of a range of safeguarding issues, including neglect, sexual abuse and child sexual and criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called "honour-based" abuse or risk of forced marriage.
- 11.1.2 School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this Policy if any absence of a pupil from School gives rise to a concern about their welfare.
- 11.1.3 All DET Schools will follow up on absences in a timely manner and, if a child is absent from the School's Early Years setting for a prolonged period of time or without notification from the Parent of the child, attempts must be made to contact the child's Parents and alternative emergency contacts. The School will consider patterns and trends in a child's absences and their personal circumstances, and use its professional judgement when deciding if the child's absence should be considered as prolonged. Consideration will also be given to the child's vulnerability, their Parent's vulnerability and their home life. Any concerns will be referred to the local CSC and/or a police welfare check requested.
- 11.1.4 All DET Schools have procedures in place to ensure that compliant reporting mechanisms are in place for pupils receiving alternative provision at another school or provider. Where concerns are raised about a pupil's attendance, the School will work with the alternative provision provider to take appropriate action in accordance with the School's Attendance Policy and this DET Safeguarding and Child Protection Policy.
- 11.1.5 Where reasonably possible, all DET Schools will hold more than one emergency contact for each pupil, and, for children in the Early Years setting, the School will hold more than two emergency contact numbers for each child.
- 11.1.6 All DET Schools shall inform the LA of any pupil, who is going to be added to or deleted from their admission registers outside of standard transition times, in accordance with the requirements of the School Attendance (Pupil Registration) (England) Regulations 2024.
- 11.1.7 This will assist the LA to:
- 11.1.8 fulfil its duty to identify children of compulsory school age, who are missing from education; and
- 11.1.9 follow up with any child, who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.
- 11.1.10 Schools shall provide the LA with the names and addresses of all pupils of compulsory school age who:
- 11.1.11 fail to attend School regularly; or
- 11.1.12 have been absent for a continuous period of ten School days and their absence has been recorded as unauthorised (Codes G, N, O and/or U) in the attendance register;

11.1.13 have been recorded as ill (Code I) in the attendance register and who the School has reasonable grounds to believe will miss 15 days consecutively or cumulatively because of sickness in an academic year.

11.2 Elective Home Education (EHE)

11.2.1 Where a Parent expresses their intention to remove a pupil from School with a view to educating at home, DET Schools will work with the LA and other key professionals to coordinate a meeting with Parents, where possible, ideally before a final decision has been made. This is to ensure that Parents have considered what is in the best interests of their child. This will be particularly important where a child has SEND, is vulnerable, and/or has a social worker.

11.3 Children attending Alternative Provision

11.3.1 Where a School places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil. This includes the School:

- (a) having records of the address of the alternative provider and any subcontracted provision or satellite sites that the child may attend.
- (b) regularly reviewing (at least half termly) the alternative provision placements made to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs.
- (c) where safeguarding concerns arise, placements will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

11.4 Special Educational Needs and Disabilities or Physical Health Issues

11.4.1 All DET Schools welcome pupils with SEND and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. Refer to the DET SEND Policy and School Accessibility Plans.

11.4.2 Additional barriers can exist when detecting the abuse or neglect of pupils with SEND or certain medical or physical health conditions that can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. DET and its Schools are mindful in particular that:

- (a) assumptions that indicators of possible abuse, such as behaviour, mood and injury relate to the pupil's condition without further exploration;
- (b) pupils with SEND or certain health conditions may be more prone to peer group isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;
- (c) some pupils may be unable to understand the difference between fact and fiction in online content (including AI-generated content) and can repeat the content/behaviour in School without understanding the consequences; and
- (d) there may be communication barriers, which are difficult to overcome to identify whether action under this Policy is required.

11.4.3 All DET Schools should consider providing extra pastoral support and attention for these pupils, along with ensuring that any appropriate support for communication is in place.

11.5 Looked after children and previously looked after children

11.5.1 The TB has appointed a Designated Teacher to work with the LA to promote the educational achievement of registered pupils, who are looked after and previously looked after children.

11.5.2 The TB ensures that staff have the skills, knowledge and understanding to keep looked after children safe, and the information they need in relation to a child's looked after legal status, for example:

11.5.3 whether they are looked after under voluntary arrangements with consent of Parents or on an interim or full care order;

11.5.4 contact arrangements with birth Parents or those with Parental responsibility;

11.5.5 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after them.

11.5.6 The DSL maintains these details, including contact details of the child's social worker.

11.6 Care Leavers

11.6.1 The DSL maintains details of the LA personal advisor appointed to guide and support care leavers, and liaises with them, as necessary, regarding any issues of concern.

11.7 Children who are lesbian, gay, bi or gender questioning

11.7.1 DET and its Schools recognise that pupils, who are or perceived to be lesbian, gay, bi or gender questioning, are vulnerable to being targeted by other children.

11.7.2 Lesbian, gay, bisexual and gender questioning inclusion is taught as part of the statutory Relationships and Sex Education/PSHE curriculum.

11.7.3 All staff are aware of these vulnerabilities and the Schools endeavour to provide a safe space to speak out or share concerns.

12 Allegations against Pupils - Child-on-Child Abuse

12.1 Allegations against pupils should be reported in accordance with the procedures detailed in Appendix 4. If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and consider the local response of the police and CSC to these issues. The views of the alleged victim will be considered, but will not be determinative.

12.2 All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this Policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services, as necessary.

13 Extra-Familial Harm

13.1 Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School, inside and outside of home and online.

- 13.2 All staff, including the DSL, should consider the context within which such incidents and/or behaviours occur, for example, where wider environmental factors are present in a child's life that may be a threat to their safety and/or welfare and should record these appropriately.
- 13.3 CSC should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.
- 13.4 Extra-familial harm: all staff, but especially the DSL (and DDSLs) should consider whether children are at risk of abuse or exploitation in situations outside of their families. Extra-familial harms take a variety of different forms, and children can be vulnerable to multiple harms, including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation and serious youth violence, county lines and radicalisation.

14 Risk Assessment

- 14.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.
- 14.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare or safety plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil-focused.
- 14.3 The HT has overall responsibility for ensuring that matters, which affect pupil welfare, are adequately risk assessed, and for ensuring that the relevant findings are implemented, monitored and evaluated.
- 14.4 Day-to-day responsibility to undertake risk assessments under this Policy will be delegated to the DSL, who has been properly trained in, and tasked with, carrying out the particular assessment.

15 What to do if staff have a safeguarding concern about someone else's welfare

- 15.1 Staff, who have safeguarding concerns about the welfare of others or any other safeguarding issue not expressly covered by this Policy, should report them.
- 15.2 In the absence of an express procedure about reporting, they should report such concerns to their Line Manager or the DSL in the first instance.

16 Allegations made and or/concerns raised about staff and others in School

- 16.1 DET and its Schools have a policy and procedures for managing allegations made and/or concerns raised about any adult working for, or on behalf of, the School, whether paid or unpaid, or any other adult (as defined in paragraph 2.3 of Appendix 5), which may affect the safety and welfare of children.
- 16.2 The procedures in this Policy apply to staff, who pose a risk of harm to children, or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low-level concerns that do not meet the harm threshold⁵. The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, unfounded, false or unsubstantiated allegations. The policy and procedures are detailed in Appendix 5 and follow the guidance in Parts 1 and 4 of KCSIE.

⁵ As defined in Part 4 of KCSIE

- 16.3 The Schools will follow their employment procedures for dealing with any other safeguarding concern raised about staff, involving external agencies, as appropriate.
- 16.4 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of DET and its Schools in relation to contact with pupils, Parents, colleagues and any other person, who comes into contact with the Trust/School. This guidance is contained in DET Staff Code of Conduct and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

17 Informing Parents

- 17.1 Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the HT, the Designated Officer(s) (LADO), CSC, the police and/or the pupil (if they are considered to be of sufficient maturity and understanding) before discussing details with Parents.
- 17.2 In all cases, the DSL will be guided by the LA Safeguarding Partners' referral threshold document.
- 17.3 Refer also to Appendix 5 for details about the disclosure of information where an allegation has been made against a member of staff.

18 Additional Reporting

- 18.1 In addition to the reporting requirements explained above, the TB will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including, but not limited to:

18.1.1 Health and Safety Executive

- (a) The School is legally required, under RIDDOR, to report certain incidents to the Health and Safety Executive. Refer to the DET Health and Safety Policy for further details.

18.1.2 Department for Education

- (a) The Trust is an exempt charity and is required to report all serious incidents to the DfE promptly and in accordance with the guidance [How to report a serious incident in your charity \(Charity Commission, June 2019\)](#). This guidance includes examples of incidents that it may be necessary to report.

18.1.3 Disclosure and Barring Service (DBS)

- (a) A referral to the DBS will be made promptly if the criteria are met. Refer to Section 8 of Appendix 5 for further details.

18.1.4 Teaching Regulation Agency (TRA)

- (a) The School is under a duty to consider whether it is appropriate to make a referral to the TRA where it has ceased to use the services of a teacher because the teacher has been guilty of serious misconduct (or might have ceased to use the services of a teacher had the teacher not ceased to provide those services). The School may also, at its discretion, make a referral to the TRA where the duty to consider doing so has not yet arisen. Refer to Section 8 of Appendix 5 for further details.

18.1.5 Insurers

- (a) The TB will consider whether it is necessary to report a safeguarding incident to the relevant insurers and/or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.
- (b) Care should be taken to ensure that this is done before renewal to ensure that the TB complies with its duties under the Insurance Act 2015. If the TB is in any doubt with regard to the correct insurer and/or policy and/or if it is unable to locate the relevant insurer, professional advice should be sought.

19 Safer Recruitment and Supervision of Staff

- 19.1 DET and its Schools are committed to practising safer recruitment in checking the suitability of staff (including those employed by another organisation). Refer to the DET Employee Recruitment Procedure.
- 19.2 The Trust and each of its Schools maintain a Single Central Record (SCR) of appointments for all staff.
- 19.3 Staff connected to a School's Early Years and later years provisions are under an ongoing duty to inform the School if their circumstances change, which would mean that they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the DET Employee Recruitment Procedure for further information about this duty and to their contract of employment in respect of their ongoing duty to update the Trust/School.
- 19.4 All visitors to all Trust Schools are supervised at all times and never left alone with pupils.

20 Use of Personal Mobile Electronic Devices and Smart Technology

- 20.1 The Schools' policies on the use of personal mobile technology, including phones and cameras, in School, can be found in the Staff Code of Conduct and Acceptable Personal Use of Resources and Assets Policy (staff) and in School Behaviour Policies (pupils).
- 20.2 All staff, including staff in the EYFS setting, should use mobile devices and cameras and other electronic devices with imaging and sharing capabilities in accordance with the guidance set out below and with further reference to the Staff Code of Conduct:
 - 20.2.1 staff (including those in the EYFS setting) must not take images of pupils using personal devices without the express approval of the HT. Such approval is only provided on condition that images are immediately sent to the relevant School device or email account, for example, for upload to Social Media, at the earliest possible time, and are then immediately deleted from the personal device (including from the recently deleted location), and the linked cloud storage. If instant messaging tools are used, for example SMS or WhatsApp, the images must additionally be deleted from the sender's sent message and the recipient's incoming messages.
- 20.3 Parents of all pupils, including Parents of pupils in the EYFS setting, may bring mobile devices onto the premises, but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

- 20.4 All pupils are regularly reminded of the School policy of the expectations for pupils' use of technology.
- 20.5 DET and its Schools allows access to the internet onsite. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring of usage, the use of generative AI and cyber-attacks.
- 20.6 The Trust's and its Schools' approach to online safety is detailed in the DET Online Safety Policy.

21 Training

- 21.1 All Trust Schools ensure that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this Policy, and have the necessary knowledge and skills to carry out their roles.
- 21.2 The level and frequency of training depend on the role of the individual member of staff.
- 21.3 All Trust Schools maintain written records of all staff training.
- 21.4 All training will be carried out in accordance with LA Safeguarding Partners procedures, where possible.

21.5 Induction

- 21.5.1 All staff, including temporary staff and volunteers, will be provided with induction training that includes (and, where relevant, includes the provision of copies of):
- (a) this Policy;
 - (b) the role, identity and contact details of the DSL and DDSL(s);
 - (c) the School's Behaviour Policy;
 - (d) the School's Anti-Bullying Policy, which includes details of the School's policy on cyberbullying and prejudice-based and discriminatory bullying;
 - (e) the DET Staff Code of Conduct
 - (f) the DET Whistleblowing Policy;
 - (g) the DET Acceptable Personal Use of Resources and Assets Policy;
 - (h) the safeguarding response to children, who are absent from education particularly on repeat occasions and/or prolonged periods;
 - (i) the DET Online Safety Policy, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
 - (j) safeguarding training in accordance with LA Safeguarding Partners procedures, including guidance on managing a report of child-on-child abuse/harmful sexual behaviour;
 - (k) KCSiE (all staff to read Part 1 and Annex B and members of SLT, DSLs/DDSLS and all other members of the School Safeguarding Team to read the guidance in its entirety);

- (l) appropriate Prevent Duty training.

21.6 Safeguarding Training

- 21.6.1 All members of Trust and School staff are required to read Part 1 and Annex B of KCSiE following its publication at the start of each academic year and when joining.
- 21.6.2 All members of SLT, DSLs/DDSs and all other members of a School's Safeguarding Team are required to read KCSiE in its entirety.
- 21.6.3 All members of Trust and School staff are required to confirm (electronically via the Trust's Compliance platform) that they have read and understood the guidance.
- 21.6.4 All members of Trust and School staff are required to read this Policy and are required to confirm (electronically via the Trust's Compliance platform) that they have read and understood the guidance.
- 21.6.5 All Trustees and Local Governors are required to read KCSiE in its entirety, and are required to confirm (electronically via the Trust's Compliance platform) that they have read and understood the guidance.
- 21.6.6 All members of Trust and School staff will undertake appropriate safeguarding training, which will be updated, at least, annually and will follow consultation with LA Safeguarding Partners. In addition, all staff members will receive informal safeguarding and child protection updates, including online safety, via email, ebulletins and staff meetings, on a regular basis and, at least, annually.
- 21.6.7 Staff in the School's Early Years setting will receive training in accordance with Annex C of the *EYFS statutory framework for group and school-based providers* (DfE, September 2025) and will be supported and confident to implement the setting's safeguarding policy and procedures on an ongoing basis. Training will be renewed every two years, and the School will consider whether any staff need to undertake annual refresher training during any two-year period to help maintain basic skills and keep up to date with any changes to safeguarding procedures or as a result of any safeguarding concerns that occur in the setting.
- 21.6.8 Staff development training will also include training on online safety, which should, amongst other things, include an understanding of the filtering and monitoring systems and processes in place in the School, measures in place to combat cybercrime, the Trust's approach to the use of generative AI by pupils and for educational purposes, searching pupils for prohibited and banned items, and Prevent Duty training assessed as appropriate for them by DET/School.
- 21.6.9 Additionally, the School, in collaboration with the Trust will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child-on-child abuse, harmful sexual behaviour, child criminal and child sexual exploitation, FGM, cyberbullying, prejudiced-based and discriminatory bullying and mental health, and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.
- 21.6.10 All Trustees and Local Governors receive safeguarding training (including online safety) on induction and annually thereafter. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the DET/School safeguarding policies are effective and support a robust whole-School

approach to safeguarding. This training is updated annually following publication of KCSiE.

21.6.11 The Safeguarding Link Governors and Specialist Safeguarding Trustee will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities.

21.6.12 The Trust and its Schools have mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively. This includes information on how staff can report concerns occurring out-of-hours/out of term time.

21.6.13 Designated Safeguarding Lead (DSL)

- (a) The DSL and DDSL9S) will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working and Prevent awareness training, and attendance on a training course, which is consistent with the criteria set out in Annex C of the *EYFS statutory framework for group and school-based providers* (DfE, September 2025) and will be updated, at least, every two years.
- (b) In addition, their knowledge and skills will be refreshed at regular intervals, at least, annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Annex C of KCSiE.
- (c) Prevent Duty training will be consistent with the Government's Prevent training for schools. See *Educate Against Hate* (HM Government, 2018) for further details.

21.6.14 Teaching Pupils about Safeguarding

- (a) The Schools teach pupils about safeguarding through the curriculum and PSHE.
- (b) The Schools recognise that a 'one size fits all' approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.
- (c) Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through Relationships and Sex Education and PSHE education appropriate to their age and stage of development. More detail can be found in the School's Relationships and Sex Education Policy.
- (d) Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and provide feedback on the content and effectiveness of training given.
- (e) Pupils understand how they can raise concerns and the processes for reporting a concern about a friend or peer, and how any report will be handled.

- (f) The safe use of technology is a focus in all areas of the curriculum and key IT safety messages are reinforced as part of assemblies and tutorial/pastoral activities so that pupils learn how to keep themselves safe online and when accessing remote learning.
- (g) All DET Schools keep in regular contact with Parents to reinforce the importance of pupils being safe online and to make them aware of the systems in place to filter and monitor online use and the sites that pupils will be expected to access during learning.

22 Monitoring and Review

- 22.1 The DSL will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Director of Education - Pastoral, as necessary, and seeking contributions from staff. The DSL will regularly update the SLT on the operation of the School's safeguarding arrangements.
- 22.2 Any safeguarding incidents at the Schools will be followed by a review of these procedures by the DSL and a report made to the TB and the LSC (termly reporting to TB by the Director of Education – Pastoral and to the LSC by the HT). Where an incident involves a member of staff, the Designated Officer(s) (LADO) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses with regards to safeguarding arrangements, at any time, will be remedied without delay.
- 22.3 This Policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.
- 22.4 The TB, in collaboration with the Director of Education – Pastoral and the Director of Operations, will also undertake an annual review of this Policy and the Schools' safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation, and the effectiveness of inter-agency working. It will also undertake an annual review of its approach to online safety and filtering and monitoring provision, supported by an annual risk assessment that considers and reflects the risks its pupils face.
- 22.5 The DSLs will work with the Director of Education – Pastoral for TB reporting purposes and with the HT for LSC reporting purposes to prepare a written report. The written report should address how the School(s) ensure that this Policy is kept up to date; staff training on safeguarding; referral information; issues and themes, which may have emerged in the School(s) and how these have been handled, including lessons learned and the contribution that the School(s) are making to multi-agency working in individual cases or local discussions on safeguarding matters. The TB and LSC should also consider independent corroboration, such as:
- 22.5.1 inspection of records or feedback from external agencies, including the Designated Officer(s) (LADO);
 - 22.5.2 reports of Ofsted inspections;
 - 22.5.3 the outcome of any relevant complaints, claims or related proceedings; and
 - 22.5.4 press reports.

Such independent corroboration is undertaken via regular monitoring visits by Safeguarding Link Governors and the Specialist Safeguarding Trustee.

22.6 The TB will review the report, this Policy and the implementation of its procedures and consider the proposed amendments to the Policy before giving the revised Policy its final approval. Detailed minutes recording the review by the TB will be made.

23 Record Keeping

23.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the School. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:

23.1.1 a clear and comprehensive summary of the concern;

23.1.2 details of how the concern was followed up and resolved; and

23.1.3 a note of any action taken, decisions reached, and the outcome.

23.2 Insofar as pupil records are concerned:

23.2.1 Staff must record all concerns about a pupil on the Child Protection Online Management System (CPOMS).

23.2.2 All staff are trained on CPOMS. Guidance on record keeping is set out in Appendix 3.

23.2.3 The DSL is responsible for managing all child protection files in accordance with KCSiE.

23.3 The information created in connection with this Policy may contain personal data. The use of this personal data by DET and its School will be in accordance with Data Protection law. DET has published Privacy Notices on its website, which apply to all DET Schools and explain how DET and its Schools will use personal data.

23.4 All records created in accordance with this Policy are managed in accordance with the DET Records Management Policy and DET Retention Schedules.

23.5 Information Sharing and Multi-Agency Working

23.5.1 DET and its Schools will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. DET and its Schools will always act in order to safeguard and promote the welfare of others.

23.5.2 DET and its Schools understand that information sharing is essential for effective safeguarding, and for promoting the welfare of children and young people, including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always DET and its Schools' paramount concern. Schools have clear powers to share, hold and use information for these purposes and the UK GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

23.5.3 When DET and its Schools intend to share safeguarding information, they will inform the pupil and their Parent(s) about what information sharing has taken (or will take) place, why and how the information will be used, unless doing so could put a child or others at further risk of harm, or could compromise effective safeguarding arrangements, including police investigations.

- 23.5.4 When the School receives a request for safeguarding information (e.g. a Subject Access Request (SAR) from a Parent or a request from the police), the School will carefully consider its response to ensure that any disclosure is in accordance with its obligations under the UK GDPR and Data Protection Act 2018. Where a request for safeguarding information is received from a Parent for an individual aged under 18, the School may be exempt from providing that data where complying with the request would not be in the best interests of the child. The School will also have regard to its Data Protection policies. Each School's GDPR Lead(s) will work with the DSL and the Trust's Data Protection Officer (DPO), as appropriate, to determine what should be disclosed.
- 23.5.5 The School will cooperate with CSC, and, where appropriate, the police, to ensure that all relevant information is shared for the purposes of Early Help assessments, and assessments and child protection investigations under the Children Act 1989.
- 23.5.6 Where allegations have been made against staff, the School will consult with the Designated Officer(s) (LADO) and, where appropriate, the police and CSC to agree the information that should be disclosed, and to whom.
- 23.5.7 While the School will share information with those involved where and when it is appropriate to do so, it may be unable to for reasons of data protection and confidentiality, for example, because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

24 Publication and Availability

- 24.1 This Policy is published on the Trust and all School websites.
- 24.2 This Policy is available in hard copy on request including in accessible formats.
- 24.3 A hard copy of the Policy is also available for inspection from the relevant School Office during the School day.
- 24.4 DET and its Schools welcome feedback on how this Policy can continue to improve. This feedback can be sent to the relevant School Office, marking the subject line "Feedback on the Safeguarding and Child Protection Policy."

Appendix 1 Forms of Abuse, Neglect and Exploitation

1 Abuse, neglect and exploitation

- 1.1 Staff should be aware that abuse, neglect and exploitation, and safeguarding issues are rarely standalone events that can be covered by one definition or label, and, in most cases, multiple issues will overlap with one another. Therefore, staff should always be vigilant and always raise any concerns with the DSL (or DDSL).
- 1.2 Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

2 Indicators of abuse and neglect

- 2.1 **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill-treatment that is not physical as well as the impact of witnessing ill-treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including when they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- 2.2 **Physical abuse:** a form of abuse, which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a Parent fabricates the symptoms of, or deliberately induces, illness in a child.
- 2.3 **Emotional abuse:** the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally-inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying and prejudiced-based or discriminatory bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 2.4 **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts, such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually-inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can

take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it. The DET policy and procedures can be found in Appendix 4.

- 2.5 **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a Parent failing to; provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

3 Signs of abuse

- 3.1 Possible signs of abuse include, but are not limited to:
- 3.1.1 the pupil says that they have been abused or asks a question or makes a comment, which gives rise to that inference;
 - 3.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
 - 3.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;
 - 3.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
 - 3.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing;
 - 3.1.6 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
 - 3.1.7 the pupil is reluctant to go home, or has been openly rejected by their Parents; and
 - 3.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example, inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
- 3.2 Mental health problems can also be a sign of abuse, neglect or exploitation.
- 3.3 The LA Safeguarding Partners can provide advice on the signs of abuse and the DfE advice [What to do if you're worried a child is being abused \(March 2015\)](#) provides advice in identifying child abuse. The [NSPCC website](#) is also a good source of information and advice.

Appendix 2 Specific Safeguarding Issues

- 1 DET and its Schools are aware of the range of specific safeguarding issues that place children at greater risk of harm.
 - 1.1 Children, who are absent from education;
 - 1.2 Elective Home Education (EHE);
 - 1.3 Child criminal exploitation and child sexual exploitation (refer Section 6 below);
 - 1.4 county lines (refer Section 7 below);
 - 1.5 serious violence (refer Section 8 below);
 - 1.6 modern slavery and the national referral mechanism;
 - 1.7 cybercrime (refer Section 9 below);
 - 1.8 domestic abuse (refer Section 10 below);
 - 1.9 homelessness;
 - 1.10 mental health;
 - 1.11 so-called "honour-based" abuse (including FGM and forced marriage) (refer Sections 11, 12 and 13 below);
- 2 preventing radicalisation (refer Section 14 below);
- 3 child-on-child abuse (refer Appendix 4 below);
- 4 sexual violence and sexual harassment between children in schools and colleges (refer Appendix 4);
- 5 upskirting (refer Section 17.12 below).
- 6 **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**
 - 6.1 Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity:
 - 6.1.1 in exchange for something the victim needs or wants, e.g. money, gifts or affection; and/or
 - 6.1.2 for the financial advantage or increased status of the perpetrator or facilitator; and/or
 - 6.1.3 through violence or threat of violence to victims (and their families).
 - 6.2 Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. Where this is the case, it is important that the child perpetrator is also recognised as a victim.
 - 6.3 CSE and CCE can affect children of any sex and can include children, who have been moved (commonly referred to as trafficking), for the purpose of exploitation.

- 6.4 International pupils may be particularly vulnerable to trafficking, particularly those who are or will be in the UK without their Parent(s) and may be targeted by traffickers as a means of facilitating a child's entry to the UK for the purposes of CSE or CCE.
- 6.5 The victim may have been exploited even if the activity appears consensual.
- 6.6 CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
- 6.7 Some of the following can be indicators of both CSE and CCE, including children who:
 - 6.7.1 appear with unexplained gifts, money or new possessions;
 - 6.7.2 associate with other young people involved in exploitation;
 - 6.7.3 suffer from changes in emotional wellbeing;
 - 6.7.4 misuse drugs and alcohol;
 - 6.7.5 go missing for periods of time or regularly come home late; or
 - 6.7.6 regularly miss school or education, or do not take part in education.
- 6.8 Children, who have been exploited, will need additional support to help maintain them in education⁶.
- 6.9 CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- 6.10 The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology, including through generative AI. CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can children who:
 - 6.10.1 have older boyfriends or girlfriends; or
 - 6.10.2 suffer from sexually-transmitted infections or become pregnant.

7 **County Lines**⁷

- 7.1 County lines⁸ is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move, store

⁶ For more information and resources see Baroness Casey's June 2025 National Audit on Group-based CSE and abuse, [The Children's Society](#) and [The Centre of Expertise on Child Sexual Abuse](#).

⁷ Fearless, a dedicated youth service connected to Crimestoppers, has produced a free resource, which provides information about county lines including the signs to spot, a glossary of terms and information on the grooming process, which schools may find helpful.

⁸ See the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance for more information.

and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

7.2 Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts, which need to be worked off, and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

7.3 A number of the indicators for CSE and CCE as detailed above (and in Annex B of KCSIE) may also be applicable to children involved in county lines.

7.4 Additional reporting duties:

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

7.4.2 where a pupil may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism⁹ should be considered.

8 Serious Violence

8.1 Indicators, which may signal children are at risk from, or are involved with serious violence crime, may include:

8.1.1 increased absence from School;

8.1.2 a change in friendships or relationships with older individuals or groups;

8.1.3 a significant decline in performance;

8.1.4 signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;

8.1.5 unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

8.2 Staff should be aware of the range of risk factors, which increase the likelihood of involvement in serious violence, e.g. being male, being frequently absent or permanently excluded from School, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further advice for schools is provided in the [Home Office's Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

9 Cybercrime

9.1 Cybercrime is a criminal activity committed using computers and/or the internet. It is broadly categorised as either "cyber-enabled" (crimes that can happen offline, but enabled at scale and speed online, e.g. fraud, purchasing of illegal drugs, child sex

⁹ For further information and a definition of trafficking, see: National Crime Agency - modern slavery and human trafficking and the DfE and Home Office guidance: Trafficking: safeguarding children

abuse and exploitation) or "cyber-dependent" (crimes that can only be committed by using a computer).

9.2 Cyber-dependent crimes include:

9.2.1 unauthorised access to computers (illegal hacking), e.g. accessing a School's computer network to look for test papers or change grades awarded;

9.2.2 denial of Service (DoS or DDoS) attacks or "booting" - attempts to make a computer, network or website unavailable by overwhelming it with internet traffic;

9.2.3 making, supplying or obtaining malware, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with intent to commit further offence.

9.3 Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

9.4 DET and its Schools have implemented appropriate measures to meet the cyber security standards in order to combat cyber-attacks and improve cyber resilience.

9.5 The DSL (or DDSL) should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide programme, which intervenes when young people are at risk of committing, or being drawn into, low-level cyber-dependent offences, and divert them to a more positive use of their skills and interests.

10 Domestic Abuse

10.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

10.2 Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, wellbeing, development and ability to learn.

10.3 All children can witness and be adversely affected by domestic abuse in the context of their home life, where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse, or may have had to leave the family home as a result.

10.4 Further advice on identifying children, who are affected by domestic abuse and how they can be helped, can be found in Annex B of KCSIE. This includes details about Operation Encompass, which operates in all police forces across England, helping schools and police work together to provide emotional and practical help to children.

11 So-called "Honour-Based" Abuse

11.1 All forms of so-called "honour-based" abuse are abuse (regardless of motivation), and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors, such as a wider network of family or community pressure and the possibility of multiple perpetrators, which

should be considered when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.

- 11.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and CSC.

12 Female Genital Mutilation (FGM)

- 12.1 FGM is a form of so-called "honour-based" abuse. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
- 12.2 There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-43 of the [Multi-agency statutory guidance on FGM \(HM Government, July 2020\)](#) (pages 61 - 63 focus on the role of schools).
- 12.3 All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve CSC, as appropriate.
- 12.4 If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this Policy. Refer the Home Office guidance [Mandatory reporting of female genital mutilation - procedural information](#) (January 2020) for further details about the duty.
- 12.5 Guidance published by the [Department for Health](#) also provides useful information and support for health professionals, which will be considered by a School's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging Parents and teaching about FGM.

13 Forced Marriage

- 13.1 Forced marriage is also a form of so-called "honour-based" abuse. Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.
- 13.2 Since February 2023, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial "marriages" as well as legal marriages.

- 13.3 Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 39-44 of the [Multi-agency guidelines: handling case of forced marriage](#) (HM Government, April 2023).
- 13.4 Staff should speak to the DSL if they have any concerns. Pages 79-84 of the [Multi-agency guidelines: handling case of forced marriage](#) (HM Government, April 2023) focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fmufco.gov.uk for advice and information.

14 Radicalisation and the Prevent Duty

- 14.1 DET and its Schools have a legal duty to have due regard to the need to prevent people from being drawn into terrorism.
- 14.2 DET and its Schools aim to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes, not just, violent extremism, but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. DET and its Schools are committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
- 14.3 DET and its Schools have adopted the Government's definitions for the purposes of compliance with the Prevent Duty:
- 14.4 **Extremism:** "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"
- 14.5 **Radicalisation:** "the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups."
- 14.6 **Terrorism:** "an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause."
- 14.7 Although there is no single way of identifying an individual who is likely to be susceptible an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors, combined with specific influences, such as family and friends, may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).
- 14.8 It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children, who might be at risk of

radicalisation, and act proportionately, which may include the DSL making a Prevent referral.

- 14.9 Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism, and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel duty guidance: protecting people susceptible to radicalisation](#) (HM Government, October 2023). The DfE and Home Office's briefing note [The use of social media for online radicalisation](#) (DfE, July 2015) includes information on how social media is used to radicalise young people, and guidance on protecting pupils at risk.

15 **Child-on-Child Abuse**

- 15.1 All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of School or online.
- 15.2 The DET policy and procedures for dealing with child-on-child abuse can be found in Appendix 4 below.

16 **Online Safety**

- 16.1 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face-to-face. In many cases, abuse will take place concurrently via online channels and in daily life.
- 16.2 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole-School approach to online safety empowers a School to protect and educate pupils and staff in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns, where appropriate.
- 16.3 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
- 16.3.1 **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, racism, misogyny/misandry, self-harm, suicide, anti-Semitism, radicalisation, extremism misinformation, disinformation (including fake news) and conspiracy theories.
- 16.3.2 **contact:** being subjected to harmful online interaction with other users; for example: peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- 16.3.3 **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

- 16.3.4 **commerce:** risks, such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils or staff are at risk, it should be reported to the Anti-Phishing Working Group.

17 **Sharing Nudes and Semi-Nude Images and Videos**

- 17.1 Consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk.
- 17.2 "Sharing nudes and semi-nudes" means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, e.g. via Apple's AirDrop. This is also known as sexting or youth-produced sexual imagery. This includes the sharing of digitally manipulated or AI-generated nude and semi-nude images.
- 17.3 DET and its Schools treat all incidences of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this Policy.
- 17.4 Members of staff must not intentionally view any nude or semi-nude images, which are reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images, members of staff should describe the content of the images as reported to them.
- 17.5 The DSL may, in exceptional circumstances, view images with the prior approval of the HT, and only where:
 - 17.5.1 it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
 - 17.5.2 it is necessary to report the image to a website or, app or suitable reporting agency to have it taken down, or to support the pupil or Parent in making a report; or
 - 17.5.3 a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the DET/School devices or network.
- 17.6 Where viewing an image is unavoidable:
 - 17.6.1 viewing should take place on School premises, wherever possible;
 - 17.6.2 the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
 - 17.6.3 a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
 - 17.6.4 full details of the viewing must be recorded in CPOMS, including who was present, the date and time, the nature of the image and the reasons for viewing it;
 - 17.6.5 any member of staff, who views an indecent image, should be given appropriate support.

- 17.7 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.
- 17.8 If an electronic device that is prohibited by the School Behaviour Policy has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.
- 17.9 If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.
- 17.10 If images have been shared online and cannot now be deleted by the person, who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).
- 17.11 Where a pupil receives unwanted images, the School should advise the pupil and their Parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.
- 17.12 The UK Council for Internet Safety's advice note [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (DfDCMS and UKCIS, March 2024) contains details of support agencies and provides further information for schools on how to responding to incidents of sharing nudes and semi-nudes.

18 **Upskirting**

- 18.1 Upskirting, typically, involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear), to obtain sexual gratification, or to cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.
- 18.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence, e.g. if actions are taken to do something that is more than merely preparatory to committing the offence, such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.
- 18.3 The School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under this Policy and local School safeguarding and child protection procedures.
- 18.4 All matters relating to upskirting images and devices, which may have been used in connection with an allegation of upskirting, will be dealt with in a similar manner to sharing sexual images/sexting.

Appendix 3 Concerns about a Child - Guidance for Staff

1 Receiving a disclosure

- 1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.
- 1.2 Do not ask leading questions, i.e. a question which suggests its own answer. Use "tell me, explain to me, describe to me" (TED) questioning. It is particularly important not to continue questioning a pupil if they disclose something which suggests that a criminal offence may have been committed - the police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings.
- 1.3 Take the pupil to the Safeguarding Team or to the person responsible for First Aid if there is a medical need and do not examine the injury yourself.
- 1.4 Reassure the pupil that they are being taken seriously, and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim will ever be made to feel ashamed for making a report.
- 1.5 Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this Policy so that the correct action can be taken.
- 1.6 Keep a sufficient written record of the conversation (refer [2](#) below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.
- 1.7 Pass on the record when reporting the concern in accordance with this Policy.

2 Recording a concern

- 2.1 Staff must record all concerns in CPOMS.
- 2.2 Records should be factual and should include:
 - 2.2.1 the pupil's details: name; date of birth; address and family details;
 - 2.2.2 date and time of the event/concern/conversation;
 - 2.2.3 a clear and comprehensive summary of the event/concern/conversation;
 - 2.2.4 details of how the concern was followed up and resolved;
 - 2.2.5 a note of any action taken and by whom, decisions reached and the outcome;
 - 2.2.6 the name and position of the person making the record.

3 Use of restrictive interventions, including the use of reasonable force

- 3.1 There are circumstances when it is appropriate for staff to use restrictive interventions, including the use of reasonable force, seclusion and restraint, to safeguard pupils and others. All members of staff have a legal power to use reasonable force in certain circumstances. In all cases, "reasonable" means using no more force than is necessary, for the least amount of time required to address the risk.

- 3.2 Staff should refer to each School’s Behaviour Policy for more detailed guidance about the use of restrictive interventions.

Appendix 4 Dealing with Allegations of Child-on-Child Abuse

1 Child-on-child abuse

- 1.1 Children of any age can abuse other children (often referred to as child-on-child abuse) and this can happen inside and/or outside school and/or online. This includes, but is not limited to:
- 1.1.1 bullying (including cyber-bullying and prejudice-based and discriminatory bullying);
 - 1.1.2 abuse within intimate personal relationships between peers (teenage relationship abuse);
 - 1.1.3 physical abuse, such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm. This may include an online element, which facilitates and/or encourages physical abuse;
 - 1.1.4 sexual violence, such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, flicking bras, unwanted kisses or embraces), possibly with an online element, which encourages sexual violence;
 - 1.1.5 sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - 1.1.6 causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
 - 1.1.7 consensual and non-consensual sharing of nude and semi-nude images (also known as "sexting" or "youth-produced sexual imagery") means the taking and sending or posting of nude or semi-nude images, videos or lives streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example, via Apple's AirDrop. This includes the sharing of digitally manipulated or AI-generated nude and semi-nude images;
 - 1.1.8 upskirting, typically involving taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
 - 1.1.9 initiation/hazing-type violence and rituals. This could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element.

2 The Trust/School Approach to Child-on-Child Abuse

- 2.1 Staff understand that, even if there are no reports of child-on-child abuse at the School, it does not mean that it is not happening. It may be the case that it is just not being reported. Staff understand the importance of reporting any concerns regarding child-on-child abuse to the DSL (or the DDSL in the DSL's absence).

- 2.2 Such behaviour is never accepted and should be considered as both a safeguarding issue and, potentially, a disciplinary one. DET and its Schools will adopt a zero-tolerance approach to abuse¹⁰. Downplaying certain behaviours by, for example, dismissing sexual harassment as "banter", "having a laugh", "boys being boys", "girls being girls" or "part of growing up" can lead to a culture of unacceptable behaviours, an unsafe environment for children, and, at its worst, to a culture that normalises abuse.
- 2.3 All staff should challenge inappropriate behaviour between pupils and anyone who suffers, witnesses or hears of abuse of any form between pupils is asked to report it in accordance with this Policy and/or the School's Behaviour and Anti-Bullying Policies, so that appropriate action can be taken.
- 2.4 Appropriate action will involve supporting all members of the School community, who may be involved, as a priority. This may require investigation by the School or by other agencies. Until investigations have been undertaken and findings made, the School will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the incident is alleged to have occurred in School, or when the pupil involved was under the School's care, and whether or not the pupil is under 18, as an issue which may impact pupil welfare. Disciplinary action will follow separately, if appropriate.
- 2.5 The School will ensure that pupils impacted by child-on-child abuse are made aware of appropriate support resources that are available to them.

3 Sexual Violence and Sexual Harassment (SVSH)

- 3.1 Where the misconduct may constitute sexual violence¹¹ (rape, assault by penetration, sexual assault¹² or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this Policy. SVSH is never acceptable.
- 3.2 Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be the victims of SVSH and more likely that it will be perpetrated by boys.
- 3.3 SVSH can occur between two or more children of any age or sex from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. SVSH exists on a continuum and may overlap. Addressing inappropriate behaviour (even where it seems to be relatively innocuous) can be an important intervention, which helps to prevent problematic or abusive behaviour in the future, by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out, and facilitating targeted support for those demonstrating harmful sexual behaviour.

¹⁰ This wording reflects KCSIE, but schools should be aware of the research undertaken by the Lucy Faithfull Foundation, Everyone's Safer which concludes that these approaches may deter disclosure, particularly when students fear harsh sanctions or feel their peers will be stigmatised and consider how to address this.

¹¹ When referring to sexual violence the statutory guidance refers to sexual offences under the Sexual Offences Act 2003 as described above

¹² Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom / breasts / genitalia without consent, can still constitute sexual assault).

- 3.4 The 2021 Ofsted report concluded that, whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The Schools acknowledge this, and that children are likely to report such matters, if at all, to people they trust. All staff are, therefore, trained to identify signs of abuse and on how to respond to a report.

4 Management of Allegations of Child-on-Child SVSH

4.1 The initial report

- 4.1.1 The Schools recognise that it is not easy for children to tell staff about abuse. Staff are trained to recognise signs of abuse and are required to look out for them and act upon them; and to respond to all reports of abuse, however they are reported and whether they are made by victims directly or third parties.
- 4.1.2 The Schools acknowledge that the initial response is incredibly important and may impact not just the management of that issue, but others of SVSH. Staff are also trained in how to receive a report. Where possible, they should be accompanied by the DSL or other member of staff.
- 4.1.3 They should:
- (a) listen carefully and respectfully, reassuring the person making the report that they are being taken seriously, and offer support without promising confidentiality or making a judgement about its veracity;
 - (b) where possible, they should ask open questions about whether pupil(s) have been harmed, the nature of the harm or if they may be at risk of harm;
 - (c) where there is an online element, considering the searching, screening and/or confiscation of devices and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child¹³;
 - (d) explain the next steps and how the report will be progressed;
 - (e) make a written record of the report (recording the facts as the child has presented them);
 - (f) inform the DSL (or DDSL) as soon as practically possible, if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

4.2 DSL's considerations

- 4.2.1 Reports of SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow, and the facts may be difficult to establish. These decisions are made on a case-by-case basis taking all of the circumstances into account, in the best interest of the pupils involved. A

¹³ School staff can search pupils with their co-operation for any item. If a pupil refuses to cooperate with a search for a "prohibited item", a member of staff should assess whether it is appropriate to use such force as is reasonable to conduct the search. Force must never be used to search for other items banned under the school rules. See <http://www.gov.uk/government/publications/searching-screening-and-confiscation> for further information.

School's response is led by the DSL, who will always have regard to Part 5 of KCSIE in the management of the issue.

4.3 The School's considerations

4.3.1 The Schools will consider:

- (a) the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but their wishes will not always be determinative as the School may have to take action to protect other children;
- (b) the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour¹⁴ has been displayed;
- (c) the ages and developmental stages of the children involved and any imbalance between them;
- (d) if there is an intimate personal relationship between the children;
- (e) whether there are any ongoing risks to those involved;
- (f) the time and location of any incident, and any action required to make the location safer;
- (g) the wider context.

4.3.2 Before deciding how best to support and protect those involved, the School will undertake Immediate risk and needs assessments:

- (a) these will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their Parents. This may involve suspension pending investigation. Risk and needs assessments will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.

4.3.3 The Schools will make a proportionate response to these matters in light of the circumstances and the factors identified above, and decide if any further action is appropriate.

4.3.4 The Schools will do all that they reasonably can to protect the anonymity of children involved in sexual violence or sexual harassment¹⁵. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.¹⁶

¹⁴ Hackett's sexual behaviours across a continuum table - which helps to identify whether sexual behaviours are normal, inappropriate, problematic, abusive or violent may be helpful here.

¹⁵ Schools should be aware of Fearless, a dedicated youth service connected to Crimestoppers, which gives young people the power to report crime anonymously. Fearless has also produced a free resource to raise awareness of child sexual abuse and harmful sexual behaviour, which schools may find helpful.

¹⁶ The Lucy Faithfull Foundation and the Home Office have developed [Shore Space](#), an online confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour which schools may find helpful.

5 **Investigations and Findings**

- 5.1 The Schools will record the findings of investigations undertaken by the police and/or the CPS, and, if the police decide not to take any further action, will consider whether investigation should be undertaken or commissioned by the School to enable it to determine, whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances where this is not appropriate, as it may prejudice a possible future investigation, for example, if a victim does not currently wish to make a victim statement. In those circumstances, a School should consider whether a limited investigation is appropriate. The concerns, discussions, decisions and reasons for these should be recorded.
- 5.2 The Schools should continue to support those involved, with reference to the range of support options set out in Part 5 of KCSIE, and should also consider whether further referral, restorative response and/or disciplinary action may be appropriate against either the perpetrator, where concerns are substantiated and/or harmful sexual behaviours identified, or the victim, where concerns were found to be deliberately invented or malicious.

Appendix 5 Raising Allegations and Low-Level Concerns

What Needs to be Reported?

Reporting all concerns: all concerns must be raised whether they are considered to be "low-level" concerns or conduct, which may meet the harm threshold.

Low-level concerns: a low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of staff may have acted in a way that is inconsistent with expected professional standards and/or the DET Staff Code of Conduct, whether inside or outside of work. No concern is too small or minor to raise under this Policy.

Concerns that meet the harm threshold: allegations that may meet the harm threshold are those that might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example; where the individual has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates that they would pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates that they may not be suitable to work with children. This includes behaviour that may have happened outside of School, which creates a transferable risk.

Definition of Harm: it is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm, but to assist understanding of what may amount to "harm", the following should be considered:

- the Safeguarding Vulnerable Groups Act 2006, which does not give a definition of harm, encouraging people to apply a "normal, everyday meaning";
- the Children Act 1989 defines:
 - "harm" as "ill-treatment or the impairment of health or development (including, for example, impairment suffered from seeing or hearing the ill-treatment of another)"
 - "ill-treatment" as including "sexual abuse and forms of ill-treatment, which are not physical";
 - "health" as "physical or mental health".

1 Key Contact Information

- 1.1 Below is the key contact information you may need to raise an allegation or low-level concern under this Policy.

Chase High School (CHS)

Designated Safeguarding Lead (DSL)	Mr. Matthew Lewis 01702 354441 mlewis@discoveryeducationaltrust.co.uk
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Headteacher (HT)	Mr. Matthew Suttewood 01702 354441 matt.suttewood@chasehigh.org
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Hogarth Primary School (HPS)

Designated Safeguarding Lead (DSL)	Mr. Robert Watson 01277 212216 head@hogarth.essex.sch.uk
Headteacher (HT)	As above.

Kelvedon Hatch Community Primary School (KHPCS)

Designated Safeguarding Lead (DSL)	Miss Victoria Townsend 01277 372341 head@kelvedonhatch.essex.sch.uk
Headteacher (HT)	As above.

Larchwood Primary School

Designated Safeguarding Lead (DSL)	Mrs. Dawn Jaycock 01277 372450 djaycock@larchwood.essex.sch.uk
Headteacher (HT)	Mr. Steve Bowsher 01277 372450 head@larchwood.essex.sch.uk

St. Martin's School (SMS)

Designated Safeguarding Lead (DSL)	Mrs. Georgina Tatman 01277 238300 gtatman@st-martins.essex.sch.uk
Headteacher (HT)	Mr. Jamie Foster 01277 238300 jfoster@st-martins.essex.sch.uk

Discovery Educational Trust (DET)

Chair of Members	Mr. Dave Smith dsmith@discoveryeducationaltrust.co.uk
Chair of Trust Board (TB)	Mrs. Helen Witty hwitty@discoveryeducationaltrust.co.uk
Specialist Safeguarding Trustee	Mr. Frazer Ferguson fferguson@discoveryeducationaltrust.co.uk
Chief Executive Officer (CEO)	Mr. Ryan Duff rduff@discoveryeducationaltrust.co.uk

Local Authority

Essex County Council Local Authority (LA) Designated Officer(s) (LADO)	Telephone number: 03330 139 797 Email: lado@essex.gov.uk
Southend-on-Sea City Council LADO	Telephone number: 01702 534591 Email: safeguardingforchildren@southend.gov.uk

2 Purpose and Application

- 2.1 **Purpose:** DET and its Schools take safeguarding extremely seriously. It is of paramount importance that an open and transparent culture is maintained in which all concerns about adults are shared promptly, responsibly and with the right person. The Trust recognises the importance of ensuring that adults, who work with, or otherwise come into contact with children, do so in a way that is consistent with its values, culture and expected standards of behaviour. The Trust also recognises that concerns may arise in several ways and from a number of sources. The purpose of this Policy is to provide a framework for all concerns to be raised, recorded and dealt with effectively by the Trust/Schools.
- 2.2 **Application:** the Policy applies to all adults working in or on behalf of DET and its Schools (whether on a paid or unpaid basis), including Members, Trustees, Local Governors, supply staff, volunteers and contractors (Staff).
- 2.3 **Other adults:** although this Policy directly relates to those who work for DET and its Schools, the Trust recognises that its safeguarding role extends to the protection of everyone associated with it, including adults, who do not work for the Trust/its Schools. Should concerns be raised about people, who are not Staff or pupils, they should be reported to the HT or DSL (School staff) or CEO (DET Central Services staff), who will take appropriate action and cooperate with the relevant agencies, as appropriate.

- 2.4 **Statutory guidance:** this Policy has regard to the following statutory guidance:
- 2.4.1 Keeping children safe in education (September 2025) (KCSIE). Part Four of KCSIE deals with allegations made and concerns raised about staff, supply staff, volunteers and contractors, who are all adults working for, or on behalf of, the Trust and its Schools. It distinguishes between two categories of concerns/allegations that can be raised about Staff. These are:
- (a) concerns that do not meet the harm threshold, otherwise known as "low-level concerns"; and
 - (b) allegations that may meet the harm threshold.
- 2.4.2 Working together to safeguard children (2023) (WT), which requires policies to be put in place setting out the process, including timescales for investigation and what support and advice will be available to individuals against whom allegations have been made. WT requires schools to have regard to KCSIE in order to fulfil their duties in respect of safeguarding and promoting the welfare of children.

3 Key Staff Duties

- 3.1 **Staff behaviour:** all Staff must comply with the DET Staff Code of Conduct, which details appropriate and expected standards of behaviour.
- 3.2 **Duty to report:** members of Staff must immediately follow this Policy to report any concerns that they have about the conduct of a member of Staff or any other adult (which could include adults not employed by the Trust/School). This includes any concern, however it arises, for example; behaviour witnessed, a concern raised by a colleague, pupil, Parent or another adult, or as result of checks or information brought to their attention.
- 3.3 **Duty to self-refer:** members of Staff must refer themselves to the HT where, for example, they have found themselves in a situation, which could be misinterpreted, which might appear compromising to others, and/or, on reflection, if they believe that they have behaved in such a way that may fall below the standards expected of them.
- 3.4 **A culture of sharing:** All Staff have a positive obligation to support the Trust and its Schools' culture of openness and sharing without fear of reprisal.

4 What Needs to be Reported?

- 4.1 **Reporting all concerns:** all concerns must be raised whether they are considered to be "low-level" concerns, or conduct, which may meet the harm threshold.
- 4.2 **Low-level concerns:** a low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of Staff may have acted in a way that is inconsistent with expected professional standards and/or the DET Staff Code of Conduct, whether inside or outside work. No concern is too small or minor to raise under this Policy.
- 4.3 **Concerns that meet the harm threshold:** allegations that may meet the harm threshold are those that might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example; where the individual has:

- 4.3.1 behaved in a way that has harmed a child, or may have harmed a child; and/or
 - 4.3.2 possibly committed a criminal offence against or related to a child; and/or
 - 4.3.3 behaved towards a child or children in a way that indicates that they would pose a risk of harm to children; and/or
 - 4.3.4 behaved or may have behaved in a way that indicates that they may not be suitable to work with children. This includes behaviour that may have happened outside of the Trust/School, which creates a transferable risk.
- 4.4 **Definition of Harm:** it is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm, but to assist the understanding of what may amount to "harm", the following should be considered:
- 4.4.1 the Safeguarding Vulnerable Groups Act 2006, which does not give a definition of harm, encouraging people to apply a "normal, everyday meaning";
 - 4.4.2 the Children Act 1989 defines:
 - (a) "harm" as "ill-treatment or the impairment of health or development (including, for example, impairment suffered from seeing or hearing the ill-treatment of another)"
 - (b) "ill-treatment" as including "sexual abuse and forms of ill treatment which are not physical";
 - (c) "health" as "physical or mental health".

5 **How to Raise Concerns and Allegations**

- 5.1 **Concerns about Staff:** where you have a concern about the conduct of a member of Staff (other than the HT, whether this is a low-level concern or an allegation of harm that meets the harm threshold, they must raise this immediately with the HT.
- 5.2 **Concerns involving the Headteacher:** where a member of staff identifies a concern about the HT, they must report the matter immediately to the CEO (or the Chair of the TB in their absence) without notifying the HT.
- 5.3 **Concerns involving the Chief Executive Officer:** where a member of staff has a concern about the CEO, they must report the matter immediately to the Chair of the TB (or the Vice Chair of the TB in their absence) without notifying the CEO.
- 5.4 **Concerns involving Members/Trustees/Local Governors:** where a member of staff identifies a concern about a Member, Trustee or a Local Governor, they must report the matter immediately to the Chair of the TB (or the Specialist Safeguarding Trustee in their absence). If either the Chair of the TB or the Specialist Safeguarding Trustee is the subject of the allegation, the matter must be reported to the Chair of Members (or the CEO in their absence).
- 5.5 **Concerns involving individuals/organisations using Trust/School premises:** where the Trust/School receives an allegation relating to an incident that happened when an individual or organisation was using the premises for the purposes of running activities

for children (e.g. community groups, sports associations, or service providers that run extra-curricular activities), it will follow the DET Safeguarding and Child Protection Policy and local School safeguarding procedures, including informing the LADO.

- 5.6 **Reports to the DSL:** if it is not possible for a member of staff to make a report to the HT or the Chair of the TB or Specialist Safeguarding Trustee, they must immediately make a report to the DSL. The DSL will act in accordance with this Policy and will, as soon as possible, inform the HT or, where appropriate, the CEO.

6 The Trust/School Response to Concerns and Allegations

- 6.1 **Appropriate action:** the Trust/School will ensure that appropriate action is taken to address concerns that are raised under this Policy.
- 6.2 **Assessing concerns:** the HT (or, if the concern relates to the HT, the CEO) will determine whether the concerns raised are low-level or potentially meet the harm threshold. All of the HT, DSL, CEO, Chair of the TB and Specialist Safeguarding Trustee have been trained to assess concerns, and to record and address them appropriately.
- 6.3 **Low-level concerns:** if the Trust/School determines that the concern is a low-level concern, the Trust/School will address the concern, as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required, and may include giving management guidance and advice or invoking the DET Capability Procedure or DET Discipline and Dismissal Procedure.
- 6.4 **Borderline cases:** the HT (or, if the concern relates to the HT, the CEO) may take advice from the LADO in borderline cases in order to establish whether the concern is a low-level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial "no names" conversation with the LADO about whether the harm threshold has been met.
- 6.5 **Referral:** where the HT (or, if the concern relates to the HT, the CEO) considers that the concerns raised potentially meet the harm threshold, the HT (or, if the concern relates to the HT, the CEO) will make a report to the LADO before further action is taken. The HT (or, if the concern relates to the HT, the CEO) may also seek advice from the LADO, as appropriate. Where a LADO referral is appropriate, this will be made within one working day of the allegation being reported in accordance with this Policy.
- 6.6 **Responding to an allegation that may meet the harm threshold:** where an allegation is made that may meet the harm threshold, the Trust/School will take advice from, and cooperate with, the LADO, the police, and any other external body that may be involved in the response to the allegation. The Trust/School will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so, and will keep the LADO informed of the action taken.
- 6.7 **Case Manager:** where an investigation into an allegation of conduct that may meet the harm threshold is deemed necessary, a Case Manager (**Case Manager**) will be appointed by the Trust/School to lead the investigation. The Case Manager will be either the HT or a person with appropriate authority appointed by the HT. Where the HT is the subject of an allegation, the Case Manager will usually be either the CEO, the Chair of the TB or the Specialist Safeguarding Trustee.

7 Disclosure of Information about Concerns and Allegations

- 7.1 **Informing the individual of a concern:** the Trust/School will, in most cases, inform the individual concerned about any low-level concern that is raised about them.
- 7.2 **Informing the individual of an allegation, where appropriate:** the Case Manager will consult with the LADO in order to agree if, and when, it is appropriate to inform the individual of the allegation.
- 7.3 **Communication and support for the individual subject to an allegation:** if and when it is appropriate to inform the individual of the allegation against them, the Case Manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this Policy, and the factors, which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.
- 7.4 **Informing the child's Parents, where appropriate:** the Case Manager will agree with the LADO when and how the Parents of the child/children involved will be informed of the allegation if they do not already know of it. The Case Manager will also agree with the LADO what information shall be shared with the Parents of the child/children as the case progresses. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon, and subject to, the laws on confidentiality and Data Protection, and the advice of external agencies.
- 7.5 **Reporting restrictions:** the Trust/School is mindful of, and will comply with, the reporting restrictions under Section 141 Education Act 2002, which prevent the identification of a teacher, who is the subject of such an allegation in certain circumstances.
- 7.6 **Involvement of external agencies:** where the LADO(s) advises that a strategy discussion is needed, or the police or CSC need to be involved, the Case Manager will not inform the individual subject to the allegation, or the Parents until these agencies have been consulted and it has been agreed what information can be disclosed.
- 7.7 **Concerns about supply staff and contractors:** where a concern/allegation has been made in respect of a member of supply staff or a contractor, the concern/allegation may be notified to their employer. Where a Case Manager has been appointed to investigate an allegation, the Case Manager will consult with the LADO before sharing any information with the individual's employer.
- 8 **Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA)**
- 8.1 **Report to the DBS:** the Trust/School is under a legal duty to make a referral to the DBS where a member of Staff is removed by the Trust/School from working in Regulated Activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to a child. The DBS will then consider whether to impose sanctions, which may restrict or prevent that person from working with children in future.
- 8.2 **Report to the Teaching Regulation Agency:** the Trust/School is under a duty to consider whether it is appropriate to make a referral to the TRA where it has ceased to use the services of a teacher because the teacher has been guilty of serious misconduct (or might have ceased to use the services of a teacher had the teacher not ceased to provide those services). The Trust/School may also, at its discretion, make a referral to the TRA where the duty to consider doing so has not yet arisen. The TRA

will consider whether to impose a prohibition order on that person which prevents them from undertaking teaching work in future.

9 Record Keeping

- 9.1 **Records of low-level concerns:** low-level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low-level concerns that have been addressed with an individual will usually be kept on the individual's HR file. In addition, all low-level concerns, including those that have not been addressed formally under this Policy, will also be stored securely in a central file (**Concerns and Allegations Record**), which will be managed by the School's HR function (or the Trust's HR function for Central Services staff).
- 9.2 **Recording low-level concerns:** the Concerns and Allegations Record will detail the name of the individual involved (if an individual is named), a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the outcome/result of the investigation into the concern. The name of the individual, who has raised the concern, should also be noted. Where that individual wishes to remain anonymous, the Trust/School will try to accommodate this as far as reasonably possible, but cannot guarantee anonymity in all circumstances.
- 9.3 **Records of allegations that may meet the harm threshold:** details of allegations that may meet the harm threshold will be recorded both on the individual's HR file and the Concerns and Allegations Record. The individual's HR file and the Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken in response to the allegation.
- 9.4 **Storage and security of Concerns and Allegations Record:** the Concerns and Allegations Record will be stored securely with all HR files. The file will be accessible to the HT and the School Business/Office Manager only, who are, upon request, able to provide it to the DSL, the CEO, the Chair of the TB, and Specialist Safeguarding Trustee only.
- 9.5 **Malicious or false low-level concerns and allegations:** details of low-level concerns and allegations found to be malicious or false will be removed from HR records and the Concerns and Allegations Record.
- 9.6 **Retention of records:** in line with the DET Records Management Policy and Retention Schedules, information stored on staff HR files about low-level concerns and allegations that may meet the harm threshold, and the Concerns and Allegations Record, will be retained by the Trust/School indefinitely. The Trust/School may, in future, be required to produce this information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding offences elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

10 References

- 10.1 **Low-level concerns:** low-level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the DET Capability Procedure or the DET Discipline and Dismissal Procedure, and it is otherwise appropriate to disclose them.

- 10.2 **Allegations that meet the harm threshold:** allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction has expired). The Trust/School will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.

11 **Questions**

- 11.1 **Contact:** please contact your Line Manager, in the first instance, if you have any questions about this Policy.

Appendix 6 Charity Safeguarding Procedures

1 Charity safeguarding duties

- 1.1 As charity trustees of an exempt charity and as a multi-academy Trust, the Trustees acknowledge that, in addition to their statutory duties to safeguard and protect children and adults at risk, they have a duty to take reasonable steps to protect everyone associated with the Trust from harm, abuse or mistreatment, whether working online or in person. This protection of the people involved in the Trust is central to its culture. The full extent of these additional safeguarding duties is detailed in the Charity Commission guidance: Safeguarding and Protecting People for Charities and Trustees. This guidance lists risks to be aware of, including discrimination, health and safety, cyber abuse and data breaches.
- 1.2 The contents of the Trust's Safeguarding and Data Protection suites of policies, the staff handbook and the Trust's Health and Safety Policy detail how any concerns about these issues will be handled. If anyone has any safeguarding concerns, which have caused or may cause harm to anyone associated with the Trust, which are not expressly covered by those or other Trust/School policies, they should contact the Director of Operations without delay.
- 1.3 The Trustees fulfil these duties by:
 - 1.3.1 leading by example and promoting a fair, inclusive and positive culture, ensuring that everyone involved with the Trust feels able to report any concerns that they may have, confident that they will be heard and responded to;
 - 1.3.2 having procedures for identifying and handling concerns in a full and open manner;
 - 1.3.3 ensuring that, where responsibility for safeguarding is delegated to individuals or sub groups, robust policies and procedures for reporting appropriate information to the wider trustee boards are in place and followed;
 - 1.3.4 setting and regularly (at least, annually) reviewing the suitability of policies and procedures as a TB to ensure that they remain fit-for-purpose and that they are followed in practice;
 - 1.3.5 establishing appropriate delegation arrangements for the effective governance and management of safeguarding matters within the Trust;
 - 1.3.6 exercising proper oversight of the management of individual safeguarding matters and a review of the performance of the Trust's safeguarding function, including consultation with stakeholders and appropriate trend analysis;
 - 1.3.7 being quick to respond to concerns, to undertake appropriate investigations, and take necessary action;
 - 1.3.8 being open and transparent and not ignoring harm or downplaying failures;
 - 1.3.9 managing conflicts of interest and/or loyalty;

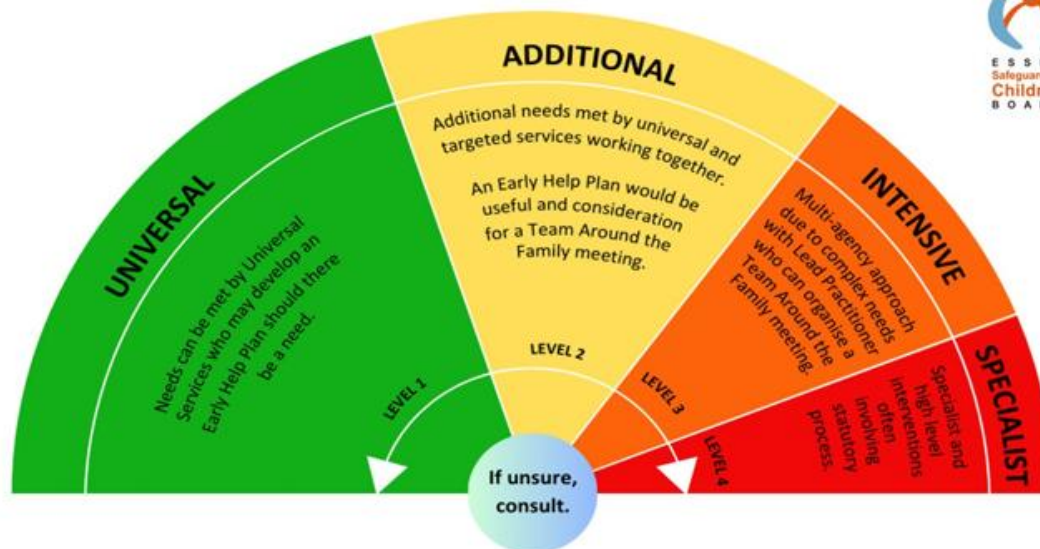
- 1.3.10 ensuring that staff receive training in safeguarding at a level which is commensurate with their role;
- 1.3.11 having clear recruitment and contracting processes and ensuring that proper due diligence is undertaken on the suitability of:
 - (a) staff (with regard to differing processes for international staff);
 - (b) partner organisations;
 - (c) contractors;
 - (d) beneficiaries;
- 1.3.12 ensuring that clear processes are in place relating to checks required where there are changes to the School structure or individual roles;
- 1.3.13 entering into any appropriate agreements with other third parties (whether those who provide services to the Trust or directly to its beneficiaries (including pupils)) covering the relationship, their respective roles and monitoring and reporting requirements.¹⁷
- 1.3.14 having a clear system of referring or reporting to relevant agencies as soon as concerns are suspected or identified;
- 1.3.15 following safeguarding statutory guidance, good practice guidance and legislation applicable to EYFS/any other relevant regime, which this Policy is designed to secure;
- 1.3.16 having a balanced TB that works together in accordance with DET Trustee and Local Governor Code of Conduct and Scheme of Delegation without any one or more Trustees dominating its work;
- 1.3.17 exercising proper oversight of the charity's online operations, adequately managing risk and ensuring that online services are suitable for users;
- 1.3.18 reviewing its premises and security arrangements and arrangements for third party use to ensure that appropriate measures are in place to keep people safe;
- 1.3.19 reviewing any grant-making undertaken to ensure that appropriate policies and procedures are in place;
- 1.3.20 implementing suitable reporting and monitoring processes in place for any work overseas;
- 1.3.21 detailing risks and how it will manage them in a risk register;
- 1.3.22 allocating sufficient resources (whether financial, staff, training or other resources) for the effective management of safeguarding, and arranging appropriate insurance cover;
- 1.3.23 ensuring that a sufficient level of oversight of the Trust's operations to manage risk and report any incident to the DfE as might be required in line

¹⁷ <https://www.gov.uk/government/publications/charities-due-diligence-checks-and-monitoring-end-use-of-funds>

with 'How to report a serious incident in your charity (Charity Commission, June 2019).

Appendix 7 Local Arrangements

The Effective Support Windscreen



All partners working with children, young people and their families will offer support as soon as we are aware of any additional needs. We will always seek to work together to provide support to children and their families at the lowest level possible in accordance with their needs.

Refer also to the Essex Safeguarding Children Board publication: [Effective Support for Children and Families in Essex \(October 2024\)](#).

Appendix 8 Regulatory Framework

- 1 This Policy has been prepared to meet DET/its Schools’ responsibilities under the following legislation:
 - 1.1 Education (Independent School Standards) Regulations 2014;
 - 1.2 EYFS statutory framework for group and school-based providers (DfE, September 2025);
 - 1.3 Education and Skills Act 2008;
 - 1.4 Children Act 1989;
 - 1.5 Children Act 2004;
 - 1.6 Childcare Act 2006;
 - 1.7 Education and Training (Welfare of Children) Act 2021;
 - 1.8 Safeguarding Vulnerable Groups Act 2006;
 - 1.9 Children and Social Work Act 2017;
 - 1.10 Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR);
 - 1.11 Data (Use and Access) Act 2025;
 - 1.12 Equality Act 2010;
 - 1.13 Human Rights Act 1998;
 - 1.14 Charities Act 2011; and
 - 1.15 Care Act 2014.

- 2 This Policy has regard to the following guidance and advice:
 - 2.1 Statutory guidance:
 - (a) **Keeping children safe in education** (DfE, September 2025)(**KCSIE**);
 - (b) **Working together to safeguard children** (DfE, updated March 2026) (**WTSC**);
 - (c) **Working together to improve school attendance** (DfE, August 2024);
 - (d) **Disqualification under the Childcare Act 2006** (DfE, August 2018);
 - (e) **Prevent duty guidance for England and Wales** (HM Government, December 2023);
 - (f) **Multi-agency statutory guidance on female genital mutilation** (HM Government, July 2020);
 - (g) **Children missing education** (DfE, September 2025);

- (h) Relationships education, relationships and sex education and health education guidance (DfE, September 2021);¹⁸
- (i) Channel duty guidance: protecting people susceptible to radicalisation (HM Government, October 2023, updated December 2023);
- (j) PACE Code C 2019

2.2 Non-statutory advice:

- (k) What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015);
- (l) Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, May 2024);
- (m) Behaviour in schools: advice for headteachers and school staff (DfE, February 2024);
- (n) Meeting digital and technology standards in education (DfE, maintained);
- (o) Sharing nudes and semi-nudes: advice for education settings working with children and young people (DCMS and UKCIS, March 2024);
- (p) Searching, screening and confiscation: advice for schools (DfE, July 2022);
- (q) Teaching online safety in schools (DfE, January 2023);
- (r) Generative AI: product safety expectations (DfE, January 2026);
- (s) Harmful online challenges and online hoaxes (DfE, February 2021);
- (t) Multi-agency practice principles for responding to child exploitation and extra-familial harm (TCE support programme)
- (u) Child sexual exploitation: definition and a guide for practitioners (DfE, February 2017);
- (v) Forced marriage resource pack (Home Office, May 2023)
- (w) Virginity testing and hymenoplasty: multi-agency guidance (DHSC, updated August 2025);
- (x) Safeguarding children and protecting professionals in early years settings: online safety considerations (UK Council for Internet Safety, February 2019);
- (y) Educate Against Hate (HM Government, maintained);
- (z) Managing the risk of radicalisation in your education setting (DfE, September 2023);
- (aa) Equality Act 2010: advice for schools (DfE, June 2018);

¹⁸ For teaching until 2026. From 2026 onwards refer to: Relationships education, relationships and sex education and health education guidance (from 1 September 2026).

- (bb) [After school clubs, community activities and tuition: safeguarding guidance for providers](#) (DfE, February 2026);
- (cc) [Mobile phones in schools: guidance](#) (DfE, January 2026);
- (dd) [The key principles of Prevent](#) (Home Office, February 2026).

2.3 Charities advice:

- 2.3.1 [Safeguarding for charities and trustees](#) (Charity Commission, November 2021);
- 2.3.2 [Safeguarding and protecting people for charities and trustees](#) (Charity Commission, June 2022);
- 2.3.3 [How to report a serious incident in your charity](#) (Charity Commission, January 2026); (noting that any report will necessarily need to be made to the DfE rather than the Charity Commission on account of the Academy Trust's exempt charity status);
- 2.3.4 [Reporting a serious incident in your charity when it involves a partner](#) (Charity Commission, December 2019); (again, with the requirement to report being to the DfE);
- 2.3.5 [Blowing the whistle to the Department for Education](#) (DfE, June 2025);
- 2.3.6 [Report serious wrongdoing at a charity as a worker or volunteer](#) (Charity Commission, June 2019);
- 2.3.7 [Guidance on reporting safeguarding concerns in a charity](#) (Department for Digital, Culture, Media and Sport, March 2022);
- 2.3.8 [Guidance on handling safeguarding allegations in a charity](#) (Department for Culture, Media and Sport);
- 2.3.9 [Safeguarding for trustees by NCVO](#);
- 2.3.10 [Charity Governance Code](#); and
[Good Governance for Safeguarding by Bond](#).

Appendix 9 Relevant Policies

- 1 The following Trust and School policies, procedures and resource materials are relevant to this Policy:
 - 1.1 DET Staff Code of Conduct;
 - 1.2 DET Acceptable Personal Use of Resources and Assets Policy;
 - 1.3 DET Whistleblowing Policy;
 - 1.4 DET Employee Recruitment Procedure;
 - 1.5 DET Online Safety Policy;
 - 1.6 School Behaviour Policies;
 - 1.7 School Anti-Bullying Policies;
 - 1.8 School Attendance Policies;
 - 1.9 DET Risk Assessment Policy for Pupil Welfare;
 - 1.10 DET SEND Policy;
 - 1.11 DET Health and Safety Policy;
 - 1.12 DET Supporting Pupils with Medical Conditions Policy;
 - 1.13 School Relationships and Sex Education Policies;
 - 1.14 DET Lettings Policy and accompanying Terms and Conditions.

Appendix 10 Additional Advice and Support

There is a wealth of information available to support schools and colleges. The following list is not exhaustive, but provides a useful starting point:

Abuse or Safeguarding Issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused	DfE
	Domestic abuse: Various Information/Guidance	Home Office
	Faith based abuse: National Action Plan	DfE
	Supporting practice in tackling child sexual abuse	Centre of Expertise on Child Sexual Abuse
	Child sexual abuse and harmful sexual behaviour resource	Fearless
Bullying	Preventing bullying including cyberbullying	DfE
Children and the Courts	Young witness booklet for 5-11-year-olds	HM Courts and Tribunal Service
	Young witness booklet for 12-17-year-olds	MoJ
Children Missing from Education, Home or Care	Children missing education	DfE
	Children missing from home or care	DfE
	Children and adults missing strategy	Home Office
Children with Family Members in Prison	National Information Centre on Children of Offenders	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS)
Child Exploitation	County Lines: criminal exploitation of children and vulnerable adults	Home Office
	Child sexual exploitation: guide for practitioners	DfE
	Trafficking: safeguarding children	DfE and Home Office
	Child Financial Exploitation resource	Fearless
	County Lines resource	Fearless
Drugs	Drugs: advice for schools	DfE and ACPO

	<u>Information and advice on drugs</u>	Talk to Frank website
	Drugs and alcohol resource	Fearless
“Honour Based Abuse”	<u>Female genital mutilation: information and resources</u>	Home Office
(so called)	<u>Female genital mutilation: multi agency statutory guidance</u>	DfE, DHSC, and Home Office
	<u>Forced marriage: statutory guidance and government advice</u>	Foreign Commonwealth and Development Office and Home Office
	Female Genital Mutilation (FGM) resource	Fearless
Health and Wellbeing	NHS guidance on fabricated or induced guidance	NHS
	<u>Rise Above: Free PSHE resources on health, wellbeing and resilience</u>	PSHE association, Public Health England
	<u>Medical conditions: supporting pupils at school</u>	DfE
	<u>Mental health and behaviour</u>	DfE
Homelessness	<u>Homelessness: How local authorities should exercise their functions</u>	HCLG
Online	<u>Online safety resources</u>	UK Council for Child Internet Safety
Private Fostering	<u>Private fostering: local authorities</u>	DfE
Radicalisation	<u>Prevent duty guidance</u>	Home Office
	The key principles of Prevent	Home Office
	<u>Prevent duty advice for schools</u>	DfE
	<u>Educate Against Hate Website</u>	DfE and Home Office
Sexual Violence and Sexual Harassment	Harmful Sexual Behaviour Support Service	SWGfL
	Marie Collins Foundation	
Violence	<u>Gangs and youth violence: for schools and colleges</u>	Home Office

	<u>Violence against women and girls: national statement of expectations for victims</u>	Home Office
	Knife crime resource	Fearless