THE WHITE HILLS PARK TRUST

Safeguarding Policy 2026-2027

Version control

Scope:	**Applicable to all Trust Schools**
Consultation:	**Academy DSLs**
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Statutory or non-statutory:	**Statutory**
Reviewer:	**James Macdonald / Chief Operating Officer**

Introduction

This policy applies to all Trust schools and academies.

Equalities

The Trust and its member schools/academies recognise their legal responsibilities under the Equality Act
The Trust and its academies recognise their responsibilities under the Equality Act 2010 and are committed to ensuring that employees and pupils are treated fairly, with due regard to the protected characteristics, including disability, gender reassignment, race, religion or belief, sex and sexual orientation.

Version Control

Version	Author	Date	Changes
0.1			First draft
0.2	Sam Mensah	November 2025	2025 KCSIE changed Appendix B and C added – contact central team
0.3	Lauren Newport	September 2026	Statutory Updates

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Important Contacts (for academy contacts, please see academy website)

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Chief Executive Officer	Claire Shaw	Claire.shaw@whptrust.org
Director of Safeguarding and Attendance	Lauren Newport	Lauren.Newport@whptrust.org

1. Aims and purpose of this policy

At The White Hills Park Trust, the safeguarding of the children in our care is of paramount importance. When children feel safe, they are more likely to feel happy and this in turn supports them being able to learn to the best of their ability, supporting our vision statement for each child who comes into our Trust to have the opportunity to fulfil their potential through achieving highly, regardless of their ability or background.

Within each school, staff encourage children and parents/carers to feel free to talk about any concerns and to see their school as a safe place when there are difficulties. Children's worries and fears will be taken seriously, and children are encouraged to seek help from members of staff.

Each school will therefore:

- Establish and maintain a culture where children feel secure and are encouraged to talk and are listened to.
- Ensure that children know that there are adults in the school whom they can approach if they are in difficulty.
- Include in the curriculum activities and opportunities for Personal, Social and Health Education (PHSE), Relationship and Sex Education (RSE) and Citizenship/Values which equip children with the skills they need to stay safe from abuse (including online abuse) and to know to whom they can turn for help.
- Ensure every effort is made to establish effective working relationships with parents/carers and colleagues from other agencies.
- Establish and maintain a training record of all staff within each school which shows compliance with mandatory safeguarding training and the requirements for **all staff** to read part one of Keeping Children Safe in Education (KCSIE). Within the Trust, safeguarding training is at least annual with updates delivered via staff meetings and bulletins on a regular basis.
- Operate safer recruitment procedures and ensure that all relevant pre-appointment safeguarding checks are undertaken and recorded as required by Keeping Children Safe in Education. Checks for staff, volunteers, agency workers and other adults will be determined by the nature of the role and whether it constitutes regulated activity; not every volunteer requires the same DBS or barred-list checks. Each academy will maintain an accurate single central record of the checks that must be recorded.
- Ensure all third-party contractors, subcontractors and agency staff are subject to appropriate safeguarding checks in accordance with statutory guidance. Each academy is responsible for obtaining and retaining written assurances of relevant checks and ensuring that records are accessible to staff responsible for verifying visitor requirements. The Director of Safeguarding and Attendance will maintain oversight of compliance through the Trust's safeguarding quality assurance processes.

KCSIE defines **safeguarding and promoting the welfare of children** as:

- Protecting children from maltreatment within or outside of the home, including online;
- Preventing impairment of children's mental and physical health and development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;

- Taking action to enable all children to have the best outcomes; and
- Providing help and support to meet the needs of children as soon as problems emerge.

Child protection is part of safeguarding and promoting welfare and is the activity to protect specific children who are suffering, or who are likely to suffer, significant harm.

The purpose of this policy is to provide a comprehensive guide around the aspects of safeguarding that are common across the Trust. This policy will act as the main safeguarding and child protection policy for each school within the Trust.

This policy applies to all staff, volunteers, governors, Trustees and visitors. Following approval through the Trust's governance arrangements, the approved policy will be published on Trust and academy websites and made available to parents and safeguarding partners. Public-facing information will include accessible routes for raising safeguarding concerns. Named and professional-only contact details will be checked before publication; any restricted operational contact details will be maintained separately by academies.

There are four main elements to our policy, all of which are underpinned by KCSIE 2026:

- Prevention – e.g. positive school atmosphere, teaching and pastoral support to pupils, safer recruitment procedures.
- Protection – following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to safeguarding and child protection concerns.
- Support – to students and school staff and to children who may have been, or are being harmed or abused.
- Working with parents/carers – to ensure appropriate communications and actions are undertaken.

2. Legislation and statutory guidance

This policy has regard to Keeping Children Safe in Education, Working Together to Safeguard Children and the safeguarding arrangements agreed by the relevant local safeguarding partners. It is also informed by relevant legislation, statutory guidance and the Trust's approved governance arrangements.

The Trust will also have regard to the Department for Education's Information Sharing Duty: Statutory guidance for safeguarding organisations and their practitioners, issued under section 16LA of the Children Act 2004.

This policy is also based on the following legislation (not exhaustive):

- The Children Act 1989 (and 2004 amendment)
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated

activity' is in relation to children.

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- Statutory guidance on the Prevent Duty
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010
- The Public Sector Equality Duty (PSED)
- The School Staffing (England) 2009
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and the Childcare Act 2006.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.
- DfE Suspension and Permanent Exclusion Guidance
- DfE Mental Health and Behaviour in schools guidance.
- DfE Preventing and Tackling Bullying
- DfE guidance on the use of reasonable force in schools.
- DfE Screening, Searching and Confiscation

The following policies and procedures support this policy. The relevant Trust-wide and academy-level documents are identified separately below.

The following related documents should be read alongside this policy. The Trust will confirm document titles and the level at which each policy is adopted before publication.

Trust-wide policies and procedures (subject to confirmation against the approved policy register)

- Staff Code of Conduct
- Complaints Policy
- Health and Safety Policy
- Recruitment and Selection Policy
- Managing Allegations and Low-Level Concerns Policy
- Whistleblowing Policy

Academy or local policies and procedures (as applicable)

- Behaviour Policy

- Attendance Policy
- Online Safety Policy
- Acceptable Use Policies
- Relationships, Sex Education and other relevant curriculum policies
- Medical Conditions Policy
- SEND, Looked After Children and Alternative Provision policies

National and local guidance (not additional Trust policies)

Keeping Children Safe in Education; Working Together to Safeguard Children; statutory relationships, sex and health education guidance; local safeguarding partnership procedures; and UKCIS Sharing nudes and semi-nudes advice.

Privacy notices and local safeguarding partners

This policy complies with the Trust's funding agreement and articles of association. The Trust works with the Nottinghamshire Safeguarding Children Partnership and the safeguarding arrangements applicable to each academy.

The three statutory safeguarding partners, as defined in the Children Act 2004 (as amended), are the local authority, the relevant integrated care board and the chief officer of police. Their local arrangements set out how they work together to safeguard children.

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

3. Definitions

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Nude, semi-nude or otherwise intimate images and videos, including AI-generated content (also known as sexting or youth-produced sexual imagery) is where children make or share nude or semi-nude images, videos or live streams.

Children include everyone under the age of 18.

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

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

Abuse, including neglect and exploitation, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child which causes severe and adverse effects on emotional development. Some emotional abuse occurs alongside other forms of maltreatment, although it can occur alone. 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.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Staff should remain alert to circumstances where a child's medical needs may indicate or increase safeguarding risk, including where essential medication or medical care is repeatedly not provided, as this may indicate abuse, neglect or exploitation.

4. Roles and responsibilities

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

All staff are expected to read Part One of Keeping Children Safe in Education (KCSIE) in full.

All Trust staff will:

- Undertake the appropriate training for their role, including induction training at the start of their employment and reading the relevant policies and documents as directed. In addition, all staff receive training on how to report a concern to the safeguarding team and the operation of the online reporting system CPOMS.
- Report an urgent concern by seeking out the DSL/DDSL to inform them as soon as possible verbally the nature of the urgent concern in order for the DSL/DDSL to act on it without delay. This should then be followed up in writing on the CPOMS system. If the DSL/DDSL is not available, the staff member should speak to a member of the leadership team or take advice from the local children's social care.
- Take responsibility to report any concerns, no matter what their role.
- Be aware of the need to minimise their own vulnerability in not being alone with children (except where their role may require this) or in situations that could render them vulnerable to poor practice and/or allegations against them;
- Always be aware of the needs of young people and be vigilant for any possible signs of abuse.
- Be aware of the early help assessment process and their role in it, including identifying emerging problems at their earliest point, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- Staff should remain professionally curious and respectfully challenge where appropriate, recognising that children may not always be ready or able to disclose abuse. Emerging concerns should always be shared with the Designated Safeguarding Lead.
- Understand the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- Know what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- Understand the signs of different types of abuse and neglect, as well as specific safeguarding issues.
- Prioritise the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- Ensure they are aware of the contents of this policy and other key safeguarding policies, including the staff code of conduct, behaviour policy, online safety policy, filtering and monitoring arrangements and attendance/children absent from education procedures.

Designated Safeguarding Leads

The Designated Safeguarding Lead (DSL) is the member of the school's Senior Leadership Team, who is responsible for the strategic leadership of safeguarding within that school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online. The DSL is the person to whom staff should pass their concerns and who will ensure a practical and efficient way of dealing with those concerns.

During term time, the DSL (or nominated DDSL) will be available during school hours for staff to discuss any safeguarding concerns.

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

- Ensure an open and efficient route for staff to bring concerns to them of any sort and to have their concerns taken seriously.
- Ensure they are appropriately trained to carry out the role.
- Support staff in ensuring they receive appropriate training.
- Promote the procedural pathway within the school, so staff are aware of the way to report concerns.
- Ensure the school procedures are followed and adhered to with regard to referring a child if there are concerns about possible abuse.
- Offer clear advice and support to staff bringing concerns or needing help. The DSL will ensure that safeguarding concerns are considered both individually and collectively, recognising that a series of low-level or seemingly isolated concerns may indicate a wider safeguarding risk requiring further assessment or intervention.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Offer appropriate feedback as necessary as to the progress of the concern.
- Maintain clear records of concerns about a child, even if there is no need to make an immediate referral and keep a record system to ensure consistency.
- Discuss with the Headteacher any complex concerns.
- Ensure that all such records are kept confidentially securely on the academy's approved safeguarding recording system (CPOMS) and are separate from pupil records.
- Follows the Safeguarding Partnership's escalation policy where cases are not progressing in an acceptable manner; and gather, collate and analyse, as appropriate, all relevant information for purposes of quality assurance.
- Help to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
- Maintain strategic oversight of safeguarding practice across the academy, identifying patterns, trends and emerging risks through the analysis of safeguarding information. This

will inform safeguarding priorities, staff training, curriculum development and the implementation of appropriate preventative measures.

- Ensure that safeguarding information is shared appropriately when children transfer between education settings, including liaison with relevant safeguarding partners where necessary to support continuity of protection.

Oversee the timely and proactive sharing of relevant safeguarding and welfare information with organisations covered by section 16LA of the Children Act 2004, including responding to requests, considering potential detriment to the child, and ensuring decisions and their rationale are recorded. Staff must not delay urgent action while seeking routine advice.

- Work with the Local Authority in respect of the annual audit, strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children
- Have a good understanding of harmful sexual behaviour.
- Have a good understanding of the filtering and monitoring systems and processes in place at our school.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to inform the school's procedures.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- Be aware of the requirement for children to have an appropriate adult in relevant police investigations or searches.
- Work closely with the Director of Safeguarding and Attendance regarding serious incidents, aspects of safeguarding compliance and Trust expectations.

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

Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead (and Deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence. PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for these purposes.

PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point. The DSL/DDSL will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on the academy's approved safeguarding recording system.

If, having been informed of the vulnerabilities, the DSL/DDSL does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned before being questioned about an offence or asked further questions if the answers provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The 'appropriate adult' means, in the case of a child:

1) the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2) a social worker of a local authority.
3) failing these, some other responsible adult aged 18 or over who is not:
    a) a police officer;
    b) employed by the police;
    c) under the direction or control of the chief officer of a police force; or
    d) a person who provides services under contractual agreements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions.

Further information can be found in the Statutory guidance - PACE Code C 2019.

Deputy Designated Safeguarding Lead(s)

Each school within the Trust will appoint at least one Deputy Designated Safeguarding Lead who will formally provide cover and additional capacity for the DSL. Each DDSL must be trained to the same level as the DSL. The Headteacher will ensure effective DSL cover during any period of absence, including illness or leave, so that safeguarding concerns continue to be received, monitored and acted upon without delay.

The Headteacher

The Headteacher in each school is responsible for ensuring the DSL is effective in their role of providing and accessing high quality services to safeguard and promote the welfare of children and young people accessing provision from their school, including:

- Ensuring that the procedures and policies adopted by the governing body are effectively followed by all staff;
- Notifying the LADO of allegations of abuse or concerns that a member of staff or adult working at the school may pose a risk of harm to children.
- Ensuring all staff and volunteers feel able to raise concerns about poor or unsafe practice concerning children, and that such issues are addressed sensitively and effectively in a timely manner. The NSPCC whistleblowing helpline is also available (0800 0280285);
- Making all staff aware of their individual responsibility to report safeguarding concerns and, where

necessary, to make a direct referral to children's social care or the police.

- Offering day to day support and guidance/supervision to the DSL as necessary;
- Overseeing the promotion of safeguarding throughout the school, ensuring all staff are appropriately trained and aware of their responsibilities;
- Ensuring cover is provided where necessary in the absence of the DSL;
- Ensuring that an appropriate member of teaching staff is designated as the person in charge of Looked After Children and receives relevant and up to date training;
- Encouraging pupils and parents to inform the school of any concerns;
- Ensuring children know who to go to if they need support;
- Having oversight of all recruitment procedures and ensuring they follow safeguarding best practice based on advice from the Trust HR Manager;
- Routinely quality assuring the Single Central Record to ensure compliance at all recruitment stages.
- Contributing, as appropriate, to quality assurance processes.
- Allocating sufficient time to DSLs to undertake the role.
- Dealing with concerns about staff that meet the harm threshold as well as low level concerns.
- Ensuring the relevant staffing ratios are met, where applicable.
- Making sure each child in the Early Years Foundation Stage is assigned a key person.
- Overseeing the safe use of technology, mobile phones and cameras in the EYFS.

The Academy (Senior) Leadership Team

The Academy Leadership Team will support the Headteacher to discharge the duties to safeguard children and young people. They will:

- Promote the importance of safeguarding throughout the school;
- Oversee the effectiveness of safeguarding systems, especially procedures, and review and report any changes that are required;
- Support the work of the DSL to ensure an effective process for dealing with concerns.
- Ensure that the school fulfils its statutory duty to co-operate with other agencies and that the chain of accountability is clear from front line to senior level.

The Director of Safeguarding and Attendance

The Director of Safeguarding and Attendance will oversee safeguarding compliance and will provide support to schools within The White Hills Park Trust for all aspects of safeguarding children and young people.

The Director of Safeguarding and Attendance works with Headteachers and DSLs to ensure that all statutory duties are fulfilled.

The Director of Safeguarding and Attendance will ensure:

- That all training, policies and procedures are reviewed and updated in line with national and local requirements and appropriate changes disseminated to all schools.
- There are systems in place to support the effective management of safeguarding, especially the role of the DSLs, training for all staff and supervision as appropriate.
- There is someone available who can offer appropriate external advice and support with safeguarding concerns especially when they are complex and/or relate to allegations against staff.
- Quality Assurance processes are in place and oversee the information they produce, to measure the progress and effectiveness of existing safeguarding frameworks;
- Information is reported to the Trust Board in relation to Safeguarding, to ensure that the Board can demonstrate that it is discharging its safeguarding obligations appropriately.

The Chief Executive Officer

The Chief Executive Officer, as Accounting Officer, will provide appropriate challenge and support to the Director of Safeguarding and Attendance to ensure the Trust and the schools are taking all opportunities to safeguard and protect the children and young people who access their services.

The Governing Body

The governing body of each school in accordance with the statutory guidance 'Keeping Children Safe in Education' will ensure that;

- The school has this policy in place and that procedures and training which are effective and comply with the law at all times.
- Governors receive appropriate safeguarding assurance and challenge regarding the effectiveness of safeguarding arrangements, including attendance, exclusions, Child-on-child abuse (including harassment and violence, online safety and safeguarding culture.
- The school operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. The same written assurances are gained from third party providers that the appropriate checks have taken place by them before any contractor/sub-contractor or agency staff are permitted on any school site. Furthermore, the Headteacher, nominated governors and other staff involved in the recruitment process have undertaken Safer Recruitment Training.
- There are procedures for dealing with allegations of abuse against members of staff and volunteers.
- There is a senior member of the school's leadership team who is designated to take lead responsibility for dealing with child protection (the 'Designated Safeguarding Lead') and there is always cover for this role with appropriate arrangements for before/after school and out of term activities.
- The Designated Safeguarding Lead undertakes effective Local Authority training (in addition to basic child protection training) and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) via safeguarding briefings etc. Updates and support are also provided by the relevant local safeguarding advisers and the Director of Safeguarding and Attendance.
- The Headteacher and all other staff and volunteers who work with children (including early years' practitioners within settings on the school site), undertake appropriate training, which is regularly updated. In the White Hills Park Trust schools, we deliver annual training. **All new staff and volunteers** are made aware of the schools' arrangements for child protection and their responsibilities (including this policy, the most current part one of Keeping Children Safe in Education, the student behaviour policy and how to respond if children go missing). All staff are provided with an induction on the first day of employment and part one of Keeping Children Safe in Education is provided to all staff and they are given time within training sessions to read this.
- The CEO will deal with any allegations of abuse against the Headteacher in liaison with the local authority designated officer (LADO)
- There are appropriate online monitoring and filtering systems in place to safeguard children online and protect their school community from harm.
- The DfE filtering and monitoring standards are reviewed and that there are discussions with IT and

service providers about what needs to be done to meet these standards successfully.

- Effective policies and procedures are in place and updated annually, including a 'code of conduct' for staff and volunteers. The schools within the Trust have regard to the 'Guidance for safer working practice for those who work with children in education settings' February 2022. Information is provided to the Local Authority through the annual safeguarding return.

- An individual member of the governing body will champion issues to do with safeguarding children and child protection within each school, liaise with the DSL and provide information and reports to the governing body.

- Each school contributes to inter-agency working in line with statutory guidance 'Working Together to Safeguard Children' 2026 including providing a co-ordinated offer of Universal services and community-based early help, alongside targeted early help through Family Help arrangements for children who require this.

The Trust Board

The White Hills Park Trust appoints a Trustee to take leadership responsibility for the Trust's safeguarding arrangements.

The Trust Board has a strategic responsibility towards all its academies to ensure that safeguarding practices across the Trust are robust and effective in safeguarding and protecting the welfare of all children and young people in its care.

The Director of Safeguarding and Attendance provides regular reports to the Trustee with responsibility for safeguarding and the Trust Board.

In addition to the responsibilities set out in KCSIE, The White Hills Park Trust has charitable status and therefore implements the DfE guidance in respect of safeguarding and protecting people.

All Trustees will have a clear oversight of how safeguarding and protecting people from harm is managed within the Trust.

The Trustees will take all reasonable steps to protect from harm people who come into contact with the Trust.

This includes children, staff, volunteers and any other people who come into contact with the Trust

The Trustees and senior managers are responsible for ensuring the Trust:

- Has appropriate policies and procedures in place, which are followed by all Trustees, staff, volunteers, supply staff and third-party contractors.

- Checks that people are suitable to act in their roles.

- Knows how to spot and handle concerns in a full and open manner.

- Has a clear system of referring or reporting to relevant organisations as soon as concerns are suspected or identified.

- Sets out risks and how they will be managed in a risk register which is regularly reviewed.

- Follows statutory guidance, good practice guidance and legislation.

- Is quick to respond to concerns and carry out appropriate investigations.

- Does not ignore harm or downplay failures.
- Has a balanced Board of Trustees and does not let one Trustee dominate its work – Trustees should work together.
- Makes sure protecting people from harm is central to its culture.
- Has enough resources, including trained staff/volunteers/Trustees for safeguarding and protecting people.
- Conducts periodic reviews of safeguarding policies, procedures and practice.

The Trustees and senior leaders will ensure that a Serious Incident Notification is made to the Charity Commission where required. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to our pupils, staff, volunteers or others who come into contact with through its work.
- loss of our money or assets
- damage to our property
- harm to our work or reputation.

The Director of Safeguarding and Attendance and CEO will meet with the named Trustee termly and provide regular reports to assist the Trustees with understanding common themes, identify risks and gaps and to consider how these are to be addressed.

Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENDCOs), social workers, mental health leads and others.

5. Confidentiality

Timely and effective information sharing is essential to safeguarding children. Fears about sharing information must never stand in the way of promoting welfare and protecting the safety of children. The Trust has a Data Protection Policy but notes that UK GDPR law does not prevent or limit the sharing of information for the purposes of keeping children safe. Records should be factual, child-centered, timely and distinguish clearly between fact, opinion and professional judgement.

The DSL will ensure that safeguarding information is shared lawfully, securely, accurately and without unnecessary delay with relevant professionals, agencies and receiving education settings, in line with statutory duties and local safeguarding arrangements.

Information Sharing Duty (section 16LA, Children Act 2004). Where the Trust holds information about a child, or about another person connected to a child, which it considers relevant to safeguarding or promoting that child's welfare, it must share that information with another organisation within the scope of the duty where it considers that disclosure may help the recipient carry out its relevant safeguarding or welfare functions. The duty also applies when a relevant organisation requests such information. Information sharing

is not dependent on a child reaching a child protection threshold: it includes emerging needs, early help, prevention, assessment and support.
Before sharing, staff should consider whether the information is relevant, whether disclosure may help the recipient fulfil its safeguarding or welfare functions, and whether sharing would be more detrimental to the child than withholding it. The exception based on greater detriment to the child is expected to be rare. Where there is a genuine risk, staff should consider proportionate mitigation, including restricting sensitive details or limiting recipients, rather than withholding all information. The DSL should be consulted promptly where a decision is complex; any decision not to share under the duty must be clearly reasoned and recorded.
Consent from the child or family is not a prerequisite to sharing information where the statutory duty applies. A parent's objection, concerns about complaints, or uncertainty about data protection do not, by themselves, justify withholding relevant information. Staff should ordinarily be open with children and families about information sharing where safe and appropriate, but must consider whether doing so could increase risk or prejudice safeguarding action. Data protection requirements still apply to the handling of personal data, including appropriate lawful bases, security, accuracy and proportionality.
Staff must record what information was shared or requested, with whom, when, the purpose and relevant context, any advice sought, and the reasons for significant decisions, including decisions to limit or withhold information. Information should distinguish facts, observations, allegations and professional judgements. The absence of a formal data-sharing agreement must not delay sharing that is required and lawful; the Trust will review its information-sharing arrangements and protocols with relevant partners.

Staff must never promise a child who discloses abuse that they will not tell anyone. The government's information sharing advice includes '7 golden rules' for sharing information that support decision-making.

The DSL should always consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
- There may be another legal basis under UK GDPR that applies.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment.
- Consider the potential impact of social media in spreading rumours and revealing the identities of victims.

6. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Staff should speak to the DSL in the first instance. Staff should maintain professional curiosity and respectfully challenge where appropriate, recognising that children may not always feel ready or able to disclose abuse.

Nottinghamshire Safeguarding Children Partnership contain the inter-agency processes, protocols and expectations for safeguarding children. The DSLs are expected to be familiar with these, with particular regard to indicators of abuse, neglect and the referral processes.

The child's voice will be central to any form of decision-making where there is a disclosure, or concerns are raised.

How to raise a concern if:

A child is suffering or likely to suffer harm, or in immediate danger

Report your concerns to the DSL immediately.

Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm or is in immediate danger and you are unable to contact the DSL. Anyone can make a referral. Tell the DSL as soon as possible if you make a referral directly.

Where there is a child protection concern requiring immediate intervention, social care should be contacted by phone.

The Nottinghamshire Multi-Agency Safeguarding Hub (MASH):
Tel: 03005008090
Email: **mash.safeguarding@nottscc.gov.uk**.

Nottinghamshire Safeguarding Children's Partnership:

Email: **info.nscp@nottscc.gov.uk**

Address: Nottinghamshire Safeguarding Children Partnership, County Hall, West Bridgford Nottingham, NG2 7QP

Hazel McKibbin, Service Manager, Safeguarding Children (Strategic) and LADO:
Tel: 0115 9773921

Eva Callaghan, Schools, FE Colleges and Early Years Referrals (including nurseries and childminders):
Tel: 0115 8041272

Written confirmation where requested should be made within 24 hours of the phone referral.

If there is a concern that the child might be at immediate risk of leaving school, you must take advice from the relevant professionals on the contact details above. Remain with the child until a social worker or relevant professional has been allocated as responsible and is present. If there are clear signs of physical risk or threat, children's social care must be updated, and the Police should be contacted immediately.

If urgent medical attention is required, arrangements must be made for the child to be taken to hospital as per the Trust Medical Conditions policy. This normally means calling an ambulance and being accompanied by a member of staff. Parents/carers must be informed that the child has been taken to hospital.

Record the concern and actions taken promptly on the academy's approved safeguarding recording system (CPOMS).

A child makes a disclosure to you

The Trust expects schools to have multiple opportunities and pathways for pupils to disclose abuse. This could be verbal, but some children may not wish to disclose this way. They can disclose via any form that they feel comfortable e.g. written, via a worry box, with support from a peer or online.

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

- Listen to them, allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.

- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Record the disclosure promptly, using the child's own words, on the academy's approved safeguarding recording system. The entry must be factual and distinguish observation from opinion and professional judgement.
- Share information confidentially with those who need to know.
- If the concern is urgent and you are unable to contact the DSL/DDSL, you must follow the steps set out in the above paragraph.

Bear in mind that some children may:

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

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

The DSL will review the report on the academy's approved safeguarding recording system and ensure that the concern, decisions, actions and outcomes are recorded securely in the child's safeguarding chronology.

You discover that FGM has taken place, or a pupil is at risk of FGM

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in the 'specific safeguarding issues' section of this policy.

As set out in Section 5B of the FGM Act 2003 and section 74 of the Serious Crime Act 2015, any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our Trust and local safeguarding procedures.

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

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

The response to FGM concerns will always take into account government guidance. There will be a considered response towards any individual who is identified as being at risk of FGM (e.g. there is a known history of practising FGM in the family, community or country of origin) which may include sensitive conversations with the child and the family, sharing information with professionals from other agencies and/or making a referral to children's social care.

If the risk of harm is imminent, there are a number of emergency measures via the police, including an FGM protection order and an Emergency Protection Order.

You have concerns about a child (as opposed to believing a child is suffering harm, or is in immediate danger)

Staff should speak to the DSL in this first instance and discuss your concerns.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care.

If there is any doubt or guidance is required, the DSL may seek advice and guidance from their respective Child's professional consultations line.

The Nottinghamshire Multi-Agency Safeguarding Hub (MASH):
Tel: 03005008090
Email: **mash.safeguarding@nottscc.gov.uk**.

Nottinghamshire Safeguarding Children's Partnership:

Email: **info.nscp@nottscc.gov.uk**

Address: Nottinghamshire Safeguarding Children Partnership, County Hall, West Bridgford Nottingham, NG2 7QP

Hazel McKibbin, Service Manager, Safeguarding Children (Strategic) and LADO:
Tel: 0115 9773921

Eva Callaghan, Schools, FE Colleges and Early Years Referrals (including nurseries and childminders):
Tel: 0115 8041272

You have concerns about radicalisation and extremism

We recognise the duties placed on the Trust by the Prevent duty guidance: Guidance for specified authorities in England and Wales (2023), to prevent our pupils being drawn into terrorism.

These include:

- Assessing the risk of pupils being drawn into terrorism.
- Working with local safeguarding partners and relevant agencies.
- Appropriate staff training
- Appropriate online filtering and monitoring systems

Our schools are committed to actively promoting the fundamental British values. Our pupils are encouraged to develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain. We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Radicalisation refers to the process by which a person is susceptible to support terrorism and extremist ideologies associated with terrorist groups. This can occur over a long period of time.

Extremism is vocal or active opposition to fundamental British values such as democracy, the rule of law and mutual respect and tolerance of different faiths/beliefs. This includes calling for the death of members of the armed forces.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We will ensure that suitable internet filtering and monitoring is in place and equip our pupils to stay safe online at school and at home as per the Online Safety Policy.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology, but staff will be alert to changes in pupils' behaviour.

Possible indicators requiring further exploration may include the following when considered in context. No single behaviour, belief, faith or identity is sufficient to indicate radicalisation:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Significant changes in associations or behaviour accompanied by other concerning indications of extremist influence.
- Rejecting activities, they used to enjoy
- Isolating themselves from family and friends
- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
- Accessing extremist material online, including on Facebook or Twitter.

- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Concerns should be assessed in their full safeguarding context. Changes in appearance, social groups, faith or religious practice, including conversion, are not in themselves evidence of radicalisation. Staff should raise concerns with the DSL where there is evidence of grooming, coercion, extremist influence, support for violence or other safeguarding risks.

If staff are concerned about a pupil, they will follow our procedures set out in the 'Taking action' part of this policy, including discussing their concerns with the DSL. Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including the online safety policy, curriculum policy and behaviour policy.

Each academy will maintain a current Prevent risk assessment, considering local and online risks and identifying proportionate actions. The DSL and Headteacher will review it regularly and following significant changes.

There is a current threat from terrorism in the UK, and this can include the exploitation of vulnerable young people, aiming to involve them in terrorism or to be active in supporting terrorism.

The DSL has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. All staff undergo Prevent Duty training upon commencement of their employment, and this is refreshed regularly. We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Our schools seek to protect children and young people against the messages of all violent extremism, including, but not restricted to, those linked to Islamist Ideology, Far Right / Neo Nazi / White Supremacist ideology etc. Concerns should be referred to the Single Point of Contact (SPOC), the DSL, who has local contact details for Prevent and Channel referrals. They will also consider whether circumstances require Police to be contacted.

If you have a concern about a child being radicalised or drawn into extremist activity, you must speak to the DSL, unless the child is in immediate danger and it is necessary to contact the police and/or children's social care without delay.

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

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group.
- See or hear something that may be terrorist-related.

You have a concern about a child's mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic experiences, this can have a lasting impact throughout childhood and into adulthood.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

Staff are not expected to diagnose mental health conditions. Their role is to promote wellbeing and prevention, identify emerging concerns, ensure children receive appropriate early and targeted support, and support access or referral to specialist services where required.

If you have a mental health concern about a child, whether this is a safeguarding concern or not, take immediate action by reporting this to the DSL.

Referral pathways

The Trust recognises the importance of providing support as soon as a problem emerges. This may include support through universal services and community-based early help or, where additional needs are identified, through Family Help arrangements, including targeted early help and children's social care.

Referrals to universal services and community-based early help, alongside targeted early help through Family Help arrangements should be considered for any child who would benefit from coordinated support, even where statutory intervention is not required. If an early help assessment is appropriate, the DSL (or DDSL) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review, and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

We follow the relevant Early Help Processes for Nottinghamshire.

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support the individual who has raised the concern to do so.

If an individual with a concern makes a referral directly, they must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

7. Escalation

If a member of staff is concerned about the work of an external agency, this should always be discussed with the DSL (or DDSL), who will take the lead in raising this with the appropriate body.

If there are concerns about the work of an external agency, the DSL will refer to the escalation policy published by the Safeguarding Partnership. The important principle is not to allow a concern to be

‘closed down’ without it having received the necessary attention, assessment and resolution.

If the options above have been explored fully and the concern is not being handled effectively and therefore placing the child or young person at risk, it is important that you continue to escalate your concerns via the escalations procedure or by contacting the NSPCC Whistleblowing Advice Line on 0800 028 0285.

8. Concerns about a staff member, supply teacher, volunteer or contractor.

The Trust takes allegations against members of staff very seriously and acknowledges that if concerns are not addressed as early as possible, they can create unsafe working environments and leave staff and children increasingly vulnerable.

The Trust Managing Allegations and Low-Level Concerns Policy sets out the procedures for concerns about adults working within the Trust, including concerns that may affect children's safety or welfare.

Concerns about colleagues in the context of pupil welfare and safeguarding may arise in a number of ways:

- Poor attitude or practice that potentially impacts on the general well-being of children that need addressing;
- Aspects of poor practice witnessed by others;
- Staff speaking against the ethos of the school or Trust;
- Non-compliance with Trust's policies and procedures relating to safeguarding.

More specifically, allegations may be made against an adult working within the Trust by a child or colleague.

All of the above will be seen as reportable matters and discussions must take place with the Headteacher.

However, certain allegations in relation to staff must be reported by the Headteacher to the Local Authority Designated Officer (LADO), who is the statutory lead for dealing with and advising about such issues, specifically where a member of staff has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Internal decisions in such cases should not be finalised without the advice of the LADO.

Hazel McKibbin, Service Manager, Safeguarding Children (Strategic) and LADO:
Tel: 0115 9773921

Eva Callaghan, Schools, FE Colleges and Early Years Referrals (including nurseries and childminders):
Tel: 0115 8041272

The reasons why staff may not wish to report their colleagues have to be understood. It would not be unusual for people to know and believe that practice is not acceptable but feel unable to respond because of the fear:

- They might have the concerns wrong;
- For their own job and prospects if they report another colleague;
- Of isolation by other staff;

- About what might happen to the member of staff in the long term.

It is particularly difficult if staff members are also close friends and/or partners in a relationship. It must be recognised that the child's welfare remains paramount at all times and staff must not lose sight of the impact on others of being on the receiving end of unacceptable and sometimes illegal behaviour.

Issues about attitude and poor practice may be dealt with internally and as part of the member of staff's development and competency. However, if such concerns are persistent and any plan with that member of staff has not affected change, advice should be sought from the LADO and appropriate action taken.

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, you must report this to the Headteacher.

If the concerns/allegations are about the Headteacher, you must report this to the Chief Executive Officer.

If the concern/allegation relates to a member of the Trust Central Team, you must report this to the Chief Executive Officer.

If the concern/allegation relates to the Chief Executive Officer, this should be reported to the Chair of the Trust Board.

The individual who the concern is reported to will then follow the procedures set out in the Trust Managing Allegations and Low-Level Concerns policy.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff any member of staff can report it directly to the local authority designated officer (LADO).

Where there is a concern or an allegation against a supply teacher, the individual school will now take a lead role in the investigation working together with the supply agency.

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, you must follow our Trust safeguarding policies.

All staff are aware of the NSPCC whistleblowing helpline should they feel concerned about the safeguarding practice in any of the Trust schools. Staff can call 0800 0280285.

All staff are aware of the Trust whistleblowing policy and should also consult this if they are concerned about safeguarding practice.

Where appropriate, the school/Trust will inform Ofsted of the allegation and actions taken, within the necessary timescale.

Full procedures of allegations management and contact details for the LADO can be found in the Trust Managing Allegations and Low-Level Concerns Policy.

Relevant documents are Part 4 of KCSIE 'Allegations of abuse made against teachers and other staff, including supply teachers and volunteers'.

9. Child on Child Abuse (including harassment and violence)

Child-on-child abuse (including harassment and violence) is any form of physical, sexual, emotional and financial abuse, and coercive control exercised between children (under the age of 18) and within children' relationships (both intimate and non-intimate), friendships, and wider peer associations. It can happen both inside and outside of school and online.

Child-on-child abuse can take many forms, including (but not limited to):

- Serious bullying (including cyber bullying)
- Relationship abuse (abuse in intimate relationships between peers)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of self-generated intimate images and/or videos, including those generated using AI (for example, deepfakes)
- Youth and serious youth violence
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- Harmful sexual behaviour and/or prejudiced based violence including, but not limited to, gender-based violence.
- Child-on-child abuse may include harassment, violence, sexual harassment, sexual violence, harmful sexual behaviour, bullying, coercion, intimidation and abuse facilitated through technology.

Harmful sexual behaviour can exist on a continuum and may progress from inappropriate or harmful sexual behaviour to sexual harassment and sexual violence. Staff must respond to concerns promptly and should not dismiss harmful behaviour as "banter", "part of growing up" or an inevitable part of childhood, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

The Trust recognises that child-on-child abuse can affect any child. Some forms of abuse, particularly sexual harassment and sexual violence, disproportionately affect girls; however, staff must remain alert to the possibility of abuse involving children of any sex and must never dismiss or minimise concerns on this basis. All child-on-child abuse is unacceptable and will be taken seriously. The Trust recognises that misogynistic attitudes, language and behaviours can contribute to harmful cultures and may form part of child-on-child abuse. Concerns involving misogyny will be addressed through safeguarding and behaviour procedures.

The Trust recognises that there are preventative measures that can be taken in respect of child-on-child abuse. We expect all schools to:

- Create an environment where staff model respectful and appropriate behaviour.
- Understand which areas of their school may be more vulnerable due to location and accessibility and increase staff monitoring and supervision in these areas.

- Educate children so they are clear about what is acceptable and unacceptable behaviour.
- Ensure children know where to go and who to ask for help if they need it, and feel confident to do so.
- Ensure the curriculum is enriched with activities and opportunities for personal, social and health education, relationships and sex education in line with the government guidance which will begin to equip children with the skills they need to stay safe from abuse and understand consent.
- Ensure that every report of child-on-child abuse and harmful sexual behaviour is responded to promptly and recorded on the academy's approved safeguarding recording system. Where necessary, risk assessments and safety plans will be completed, shared with appropriate staff and reviewed.
- The DSL will ensure that all concerns relating to child-on-child abuse, including technology-facilitated abuse, are managed in accordance with statutory guidance, taking account of the needs of all children involved and ensuring appropriate support is provided.
- Embedding into each school a culture of zero tolerance towards any form of child-on-child abuse highlighted this in assemblies, talks, form time, staff on duty at break and lunch times to consistently maintain the standard in regard to this.
- Include sanctions where appropriate when responding to incidents to reinforce a culture where child-on-child abuse is not tolerated.
- Seeking student voice regularly to identify their understanding, expectation and experiences as well as the impact of any interventions or culture shift. Decisions should be informed by the wishes, views and lived experiences of the child wherever appropriate.
- Deliver appropriate training sessions to staff that highlight abusive behaviour and how these should be addressed, including how to reassure victims.

We expect all schools and staff to:

- Challenge any form of derogatory or sexualised language between peers.
- Be vigilant to issues that particularly affect children of any sex.
- Be alert to any reports of sexual violence and/or harassment that may point to environmental or systematic problems that could be addressed by updating policies and the curriculum, or could reflect wider issues that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration.
- Ensure that we do all we can to make sure the victim and alleged perpetrator(s), and any witnesses are not bullied or harassed.
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and or/harassment.
- Adopt an 'it does happen here' approach to child-on-child abuse and recognise that if there are no reported incidents, such abuse still may be taking place.

Staff training will include details of:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here".
- Staff should act promptly on concerns rather than wait for a direct disclosure. Victims may communicate that something is wrong indirectly. For example:

1. Children can show signs or act in ways they hope adults will notice and react to.
2. A friend may make a report
3. A member of staff may overhear a conversation.
4. A child's behaviour might indicate that something is wrong.
5. That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
6. That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
7. The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
8. That they should speak to the DSL if they have any concerns.
9. That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

Most cases of pupils abusing other pupils will be dealt with under individual school's behaviour, anti-bullying and online safety policies, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

We will also refer to the following guidance where specific risks are identified and a risk assessment will be undertaken to ensure the safety of staff and pupils:

- Keeping Children Safe in Education Part 5.
- National Police Chiefs Council 'When to call the police'.
- UK Council for Internet Safety - Sharing Nudes and Semi-Nudes – Advice for education settings working with children and young people.

- The Brook Traffic Light Tool for sexual behaviour.
- The Hackett Continuum of harmful behaviour
- DfE Behaviour in Schools.
- DfE – Mental health and behaviour in schools.

In some circumstances, our duty of care may also extend to incidents that occur outside of school hours if the impact of that experience affects the child at school. The school will take appropriate action and respond to incidents brought to our attention whether they occur in the community, in the home or online and this action could involve reporting to the police if the information reported indicates criminal activity having taken place.

Child-on-child abuse can include harmful sexual behaviour. The Trust takes an 'it could happen here' approach and requires every academy to provide clear safeguarding reporting routes, including for child-on-child abuse and harmful sexual behaviour. Staff will receive training, advice and ongoing support on reporting concerns through the academy's approved safeguarding recording system.

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

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

- Report the concern promptly to the DSL and record it on the academy's approved safeguarding recording system (CPOMS). Urgent concerns must also be reported directly to the DSL or DDSL without delay.
- The relevant staff will follow the behaviour/anti-bullying policies supported by KCSIE guidance.
- Where appropriate, the DSL will contact children's social care and follow its advice, and consider whether the police should be contacted where the allegation may involve a criminal offence.
- The DSL (where appropriate) will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- We will offer support to all children involved, including making external referrals to support services such as MHST, school nurse, counselling services and CAMHS. Signposting is available in schools so that pupils are able to approach services directly if they wish.

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

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

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident does not prevent our school from responding appropriately to safeguard children. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action might prejudice an investigation or subsequent prosecution; the academy will liaise with the police and/or children's social care before determining the next steps.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

10. Making or Sharing Self-generated intimate images and/or videos, including those generated using AI (for example, deepfakes)

Schools will respond to all concerns involving nude or semi-nude imagery in line with UK Council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024):
https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

'Sharing nudes and semi- nudes' is defined as 'sending or posting the 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 could also involve sharing between devices via services that work offline.

The term ‘nudes’ is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents, but there are many wider shared terms that staff should be aware of.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images are also created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may occur where:

- Children find nudes and semi-nudes online and share them claiming to be from a peer.
- Children digitally manipulate an image of peer into an existing nude online.
- Images created and shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.
- Images are generated using Deepfake or AI technology.

Nudes and Semi-Nudes, including AI-generated Images

The Trust recognises that the creation, sharing and distribution of nudes and semi-nudes is a safeguarding concern. This includes any nude or semi-nude photographs, videos, livestreams or other visual content involving children under the age of 18.

Images may be self-generated, shared or created by another person, digitally altered, or generated using artificial intelligence (AI), including ‘deepfake’ or ‘deep nude’ images.

The Trust will respond to concerns involving nudes and semi-nudes, including AI-generated images, in line with safeguarding procedures and relevant statutory guidance. Such incidents may constitute child-on-child abuse and will be managed with a focus on safeguarding, supporting affected children and reducing harm.

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

It is important to remember that creating nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal and this needs to be considered in the response to each individual incident. The relevant legislation is contained in the Protection of Children Act 1978 as amended in the Sexual Offences Act 2003. Specifically:

- It is an offence to possess, distribute, show and make indecent images of children.
- The Sexual Offences Act 2003 defines a child, for the purposes of indecent images, as anyone under the age of 18.

Upskirting is a criminal offence and is included under child-on-child abuse. This is the act of taking a picture under a person’s clothing without their knowledge or consent with the intention of viewing their genitals or buttocks causing the victim distress, humiliation, or alarm. Anyone of any gender can be a victim.

‘Indecent’ is not defined in legislation however the following images are likely to be defined as such by a jury, magistrate or judge and therefore by schools if we become aware that the image contain:

- nude or semi-nude sexual posing e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear.

- someone nude or semi-nude touching themselves in a sexual way.
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals

The non-consensual sharing of intimate images, including digitally altered or AI-generated images, may constitute a criminal offence under the Sexual Offences Act 2003, as amended by the Online Safety Act 2023.

All incidents involving the sharing of nude or semi-nude images or videos require a safeguarding response, whether the sharing is consensual or non-consensual. The DSL will consider the individual circumstances, including the child's age and development, vulnerability, coercion, exploitation and any wider safeguarding concerns, and respond proportionately in accordance with UKCIS guidance.

Incidents can be broadly divided into two categories:

Aggravated: incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can be further sub-categorised into:

- **Adults involved:** adult offenders attempt to develop relationships by grooming children and young people, in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family friends, relatives, community members or contacted via the internet. The images may be solicited by adult offenders.
- **Youth only – intent to harm:** these cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people.
- **Youth only – reckless misuse:** no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly, and a victim may have been harmed as a result.
- **Experimental:** incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can be further categorised into:
- **Romantic:** incidents in which young people in ongoing relationships make images for themselves and each other, and images were not intended to be distributed beyond the pair.
- **'sexual attention seeking':** the phrase 'sexual attention seeking' is taken directly from the typology however it is important to note that incidents of this category can be part of a normal childhood. A child or young person should not be blamed for taking and sharing their image.

Other: cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the 'Romantic' or 'Attention Seeking' sub-types. These involve either young people who take pictures for themselves (no evidence of any sending, sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

Financially motivated sexual exploitation or 'Sextortion'

Financially motivated sexual extortion (often called sextortion) is a form of online blackmail in which a perpetrator threatens to share real, manipulated or AI-generated intimate images unless a child complies with demands, often for money. This is a serious safeguarding concern. Children should receive a prompt, calm, non-judgemental response and support from the DSL.

Possible signs of sextortion-related distress may include:

- stealing,
- shame,
- anxiety,
- secretiveness about online activities
- significant behaviour changes, including mood swings;
- excessive internet use,
- a decline in academic performance.

Staff should respond without blame or shame, reassure the child and inform the DSL immediately. Staff

must not intentionally view, download, screenshot, copy, forward or distribute sexual imagery involving children, or ask a child to share it. Preserve relevant contextual information without circulating images and seek DSL and, where appropriate, police advice on evidence handling, including whether any deletion should take place. Follow the UKCIS 2024 guidance and the academy's safeguarding procedures.

Responding to an incident

The 'When to call the police' guidance makes it clear that this requires an immediate safeguarding response.

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images or videos, this must be reported to the DSL immediately.

Staff must **not**:

- Intentionally view, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it without DSL advice.
- Question the pupil in detail about the imagery (initial fact-finding and any necessary investigation are for the DSL and relevant agencies).
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

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

Initial actions

Following a report of an incident, the DSL will review the report with appropriate school staff. Consideration will be given to the following with an aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the pupils involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are considered harmful or violent particularly in relation to the activity type, frequency, duration or context in which they occur.
- The imagery involves sexual acts and any pupil in the images or videos is under 13.
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be recorded on the academy's approved safeguarding recording system.

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

11. Sexual violence and sexual harassment

Sexual violence refers to sexual offences as described under the Sexual Offences Act 2003, including rape and sexual assault. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and may include sexual name-calling, taunting or "jokes" and physical behaviour, for example, deliberately brushing against someone or interfering with clothes. Evidence shows that girls, children with SEND and LGBTQ+ children are more likely to be the victims of sexual violence and harassment, and boys are more likely to be the perpetrators. However, sexual violence and sexual harassment can occur between children of any gender.

Sexual violence and sexual harassment can occur:

- Between two children of any age and sex.
- Through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Online and face to face (both physically and verbally)
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing, which could adversely affect their educational attainment, and this will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

Responding to an incident

- Schools will follow the DfE guidance contained in KCSIE part 5.
- Challenge inappropriate behaviours, making clear that sexual violence or harassment is not acceptable and is not tolerated.
- Challenge and sanction physical behaviours that are potentially criminal in nature e.g. grabbing bottoms, breasts, pulling down trousers.
- School DSLs and pastoral teams will refer to the Brook Traffic Light Tool and the Hackett Continuum of harmful behaviour to identify the concerning behaviour and support appropriate action. Schools can also refer to resources signposted and provided by the Eshaw team Harmful Sexual Behaviour (HSB)
- We will liaise with the police, social care and parents/carers as appropriate.
- We will offer support to both the victim(s) and perpetrator(s). Parents/carers will be included in discussions about the format that this support will take.

DSLs and the Leadership team will:

- Regularly review decisions and actions, and update policies with lessons learnt.
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and implement a plan to minimise the risk of it happening again.
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.

12. Safeguarding in the curriculum

Children are taught about safeguarding in school including online risk, through various teaching and learning opportunities, as part of a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it. The following areas are among those addressed in personal, health, social and emotional, (PHSE) and the wider curriculum in an age-appropriate manner:

- Child abuse and neglect, the four main categories.
- Child on child abuse including harmful sexualised behaviour, bullying and cyberbullying.
- Drugs, alcohol and substance abuse (including awareness of County Lines and the criminal exploitation of children)
- Internet safety
- recognising unsafe situations and relationships, identifying trusted adults and knowing how and where to seek help;
- Domestic abuse and Parental Conflict

- Honour based abuse, forced marriage, female genital mutilation.
- Sexual exploitation of children (CSE) including online.
- Child criminal exploitation
- Extremism and Radicalisation
- Relationship and sex education as defined by current statutory guidance.

A planned and age-appropriate curriculum is in place to address the sharing of nudes and semi-nudes**,** consent and healthy and respectful relationships. This will also be underpinned by the school's behaviour policy and pastoral support system. The safeguarding teams will take the opportunity to embed further learning by delivering assemblies that support the curriculum and address any arising trends or serious incidents. The curriculum will support children's critical thinking, particularly around identifying misinformation, disinformation, and conspiracy theories, in line with KCSIE expectations.

13. Reporting systems, monitoring and transfers

Well-kept records are essential to strong child protection practice. All staff are clear about the need to report and record concerns about a child within each school. Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

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

To achieve this, we will:

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

Concerns are recorded promptly on the academy's approved safeguarding recording system (CPOMS), which alerts the relevant safeguarding team. Pupils are informed how to raise concerns through lessons, assemblies and pastoral support arrangements.

If a concern is written down by a child or by a member of staff these written concerns can be scanned onto the system and once the concern has been logged and any such document created by a child disclosing abuse should be handed to the DSL without delay.

Where a concern is urgent, staff must contact the DSL or DDSL directly and without delay in addition to recording the concern on the academy's approved safeguarding recording system.

Safeguarding records held on the academy's approved safeguarding recording system are confidential and accessible only to the safeguarding team and other staff with a legitimate safeguarding need to know.

Child protection records are reviewed regularly by the safeguarding team and by the Director of Safeguarding and Attendance to check whether any action or updating is needed.

When children transfer school, their safeguarding records are also transferred. The DSL will ensure the child's safeguarding file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the school or college to have support in place for when the child arrives.

Safeguarding records will be transferred separately from other records and will be sent directly to the DSL in the receiving school or sixth form with any necessary discussion or explanation and a signed and dated record of the transfer is kept. Where a child needs specific support or has an open child protection plan, relevant information will be transferred prior to the child arriving at their new school in whatever way is considered appropriate; this may be a transition meeting between the schools if they are local to one another. If physical files have to be sent through the post, they will be sent by recorded delivery. All file transfers are in line with GDPR protocols.

When a child moves between education settings or local authority areas, relevant safeguarding and welfare information will be shared proactively and securely with appropriate recipients to support continuity of help and protection. Information should include relevant context and any current risks or support needs; transfer arrangements must not prevent earlier sharing where necessary.

14. Safer Recruitment

The Trust follows its Recruitment and Selection Policy, alongside the safer recruitment requirements set out in Part Three of Keeping Children Safe in Education.

Each school will provide all the relevant information in references for a member of staff about whom there have been concerns about child protection/ inappropriate conduct.

Cases in which the conclusion of an allegation has been unsubstantiated, unfounded, false or malicious will not be included in employer references. A history of repeated concerns or allegations, which have all been found to be unsubstantiated, malicious etc. will also not be included in a reference.

Each school has an open safeguarding ethos regularly addressing safeguarding responsibilities during meetings and fostering an ongoing culture of vigilance and 'it could happen here'. All new staff and volunteers receive a safeguarding induction and a copy of the code of conduct.

In line with statutory requirements, every recruitment process for school staff will have at least one member (teacher/manager/leader or governor) who has undertaken safer recruitment training.

The Trust has a Governance Recruitment and Induction Principles document which support the recruitment of Governors and Trustees, including the carrying out of enhanced DBS and the relevant management checks.

When we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. For all alternative provision placements, the school must obtain written assurance of safer recruitment checks, regularly review the placement at least half-termly, and confirm the child's education site during all school hours.

The Academy will undertake appropriate safeguarding checks for all volunteers. Where volunteering activity meets the statutory definition of regulated activity with children, an enhanced DBS check including children's barred list information will be obtained.

Where a volunteer is not engaged in regulated activity, the school will undertake a written risk assessment and use professional judgement to determine whether an enhanced DBS check without

barred list information is appropriate. The assessment will consider the nature and frequency of the activity, the level of contact with children and any other relevant safeguarding considerations.

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

15. Online safety and the use of mobile technology.

The White Hills Park Trust takes a whole trust approach to Online Safety to protect children from accessing potentially harmful and inappropriate content online and this is contained within the Trust Online Safety Policy. The safeguarding issues are categorised into four main areas of risk:

1. **CONTENT:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalization and extremism.

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.

3. **CONDUCT:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending or receiving explicit images (including consensual or non-consensual sharing), accessing inappropriate content, or online bullying.

4. **COMMERCE:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

We have an explicit Online Safety Policy which is in place to safeguard and protect all members of the White Hills Park Trust community online. As a Trust, we believe that online safety is an essential part of safeguarding. We understand the importance of having robust processes in place to ensure the online safety of all pupils and staff. This is reviewed at least annually.

Our policy identifies clear procedures to use when responding to online safety concerns, including the monitoring of staff use of technology, the use of mobile phones and rights to searching and confiscation.

It sets out steps to identify and support groups of pupils that are potentially at greater risk of harm online than others and reflects an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology, including mobile and smart technology. The processes we have in place support pupils and staff to work safely and responsibly and to model positive behaviour online.

Technology and associated devices are an important part of everyday life. Pupils should be empowered to build resilience and develop strategies to recognise, manage and respond to risks online. Staff receive annual training which is appropriate to their role.

Online risks now include exposure to misinformation, disinformation (including fake news), and conspiracy theories. Staff must be trained to help students critically evaluate online content.

Staff must be familiar with cyber security standards and DfE guidance on safe and effective use of Generative AI tools. Staff will remain alert to the safeguarding risks associated with generative artificial intelligence (AI), including AI-generated images, voice cloning and manipulated content, and will respond in accordance with this policy where these present a safeguarding concern.

Emerging Technology Risks

The Trust recognises that developments in technology, including artificial intelligence (AI), continue to create new and evolving safeguarding risks. These may include, but are not limited to:

- the creation, possession or sharing of self-generated intimate images or videos;
- AI-generated or manipulated content, including deepfakes and other synthetic media;
- online coercion, exploitation, blackmail or extortion involving intimate content;
- technology-facilitated child-on-child abuse, including harassment, bullying, sexual harassment and image-based abuse; and
- the misuse of social media, messaging platforms, gaming platforms and other online technologies to exploit or harm children.

The Trust recognises that harm occurring online can have significant offline consequences and will respond to concerns involving emerging technologies in the same way as any other safeguarding concern. Staff must remain vigilant to emerging risks, report concerns promptly in accordance with this policy, and seek advice from the DSL where appropriate. The DSL will maintain oversight of emerging safeguarding risks associated with technology, including artificial intelligence (AI), and ensure that appropriate safeguarding responses, staff awareness and preventative education reflect developments in the online environment.

Generative AI tools used in the educational setting must comply with the DfE's 2026 guidance to ensure age-appropriate safeguards, accuracy, and moderation of content.

Each academy will maintain filtering and monitoring arrangements that are appropriate to the age, needs and abilities of pupils and meet the applicable DfE standards. The senior leader responsible for filtering and monitoring will ensure their effectiveness is reviewed at least once every academic year, with support from the DSL and IT support. The review will include checks that filtering works appropriately on all internet-connected devices in relevant locations, and records of those checks, findings and actions will be retained.

The Trust reminds staff that although there are effective systems in place, we must remain vigilant to online risks and continue to use effective classroom management and the curriculum to inform and safeguard learners.

We maintain a record of all users who are granted access to our devices and systems.

Each academy must maintain an accurate record of its filtering and monitoring arrangements, including any use of Lightspeed or other approved systems. Further procedures for reporting and managing online safety incidents are set out in the academy's Online Safety Policy.

In accordance with KCSIE and the DfE's statutory mobile phones in schools guidance, academies will be mobile phone-free environments for pupils throughout the school day by default, including lessons, transitions, breaktimes and lunchtime. Any permitted exceptions or reasonable adjustments, and the practical arrangements for implementing this expectation, will be set out in the relevant academy behaviour or mobile phone policy.

In EYFS settings, the following measures support the safe use of mobile phones and cameras:

Therefore:

- EYFS Staff will not carry personal mobile phones while working.
- A mobile phone will be taken on all school trips.

- EYFS Children are not allowed to bring mobile phones into school.
- Parents, carers and visitors must not photograph or record children without the academy's express authorisation. They should minimise non-essential mobile phone use on school premises and follow any additional rules communicated for EYFS and other designated areas.
- Professionals who need to use mobile phones or other devices in the course of their duties may do so appropriately, provided use does not compromise safeguarding, privacy or confidentiality. Staff should challenge use that presents a safeguarding concern and direct visitors to an appropriate space where necessary.
- It is good practice at times to record photographic and video images of pupils, or to allow pupils to record images of each other to assist teaching and learning, or to celebrate achievement. There is, however, potential for images of children to be misused. Employees should therefore adhere to the following:
- Only record images when there is a justifiable need;
- Ensure that pupils understand the reason for the recording of the images and how the images will be used and stored;
- Ensure that a senior colleague is aware of the recordings and how the recording or image is being taken;
- Ensure that all images recorded are available for scrutiny;
- On admission to the school, seek consent regarding photography and video use.

16. Working with pupils and their families

Parents/carers.

Each school will ensure that parents/carers have an understanding of the child protection responsibility placed on the school and staff. This can be via policies, the school website and communication with new and current families.

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a concern or a disclosure

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

17. Children who are potentially at greater risk of harm.

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We are particularly alert to those who:

- Have special educational needs and/or disabilities (SEND) or health conditions.
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender reassignment or sexuality.
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs.

- Are looked after or previously looked after.
- Are absent from education for prolonged periods and/or repeat occasions.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.
- Are already (have previously been) allocated a social worker.

The Trust recognises that children who are abused or who have witnessed abuse may find it difficult to develop a sense of self-worth and view the positives in their life. School may be one of the few stable and secure components of their lives.

We offer extra pastoral support for these pupils. This includes pastoral mentoring, mental health support referral pathways, emotional coaching and any appropriate direct work that could improve a child's emotional wellbeing.

Our schools seek to remove any barriers that may exist in being able to recognise abuse, neglect or exploitation in pupils with special educational needs or disability. We will seek to provide such children with the necessary support to and to build their self-esteem and confidence. The context in which safeguarding incidents occur and/or behaviour occur, whether in school or outside (including online), will be considered by staff, particularly the DSL/DDSL. Any associated threats or risks will be included in assessments and relevant information included in referrals to Children's Social Care (contextual safeguarding).

Schools within the Trust also recognise that some children will not feel ready to disclose abuse or do not recognise that they are victims of it. Schools facilitate a range of opportunities to disclose e.g. open-door policy, worry boxes, pastoral email addresses to ensure that students can contact a member of staff if they need to. The safeguarding curriculum teaches children how to recognise various forms of abuse and how to report these.

We recognise that pupils with SEND, or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Autism (in line with the SEND Code of Practice), formerly referred to as autism spectrum disorder, is considered in safeguarding where additional needs may affect a child's vulnerability. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Staff must not assume that indicators of possible abuse, including changes in behaviour, mood or injuries, arise solely from a child's disability or health condition without further exploration.
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

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

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

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

Each school has an appointed designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. They are appropriately trained and have the relevant qualifications and experience to perform this role. The school will liaise with the Virtual School Head (VSH), whose role now includes promoting education of children with a social worker and those in kinship care.

- Appropriate staff will have relevant information about a child's looked-after legal status, contact arrangements with those who have parental responsibility, and care arrangements.
- The DSL has details of children's social workers and relevant virtual school heads.
- As part of their role, the designated teacher will:
- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

Where school absence indicates safeguarding concerns, schools must work with children's services in line with 'Working Together to Improve School Attendance' statutory guidance.

Where suspension or permanent exclusion is being considered, the school will take account of any safeguarding concerns, unmet needs, SEND, mental health, disability, social care involvement or other vulnerabilities. Safeguarding information will be shared appropriately with relevant staff to inform decision making and ensure appropriate support remains in place throughout any period of suspension or following permanent exclusion. Following a suspension, schools will ensure appropriate reintegration arrangements are in place, including consideration of safeguarding, wellbeing and any ongoing support required.

Children who are questioning their gender

The Trust recognises that children who are questioning their gender may require sensitive and thoughtful support. Staff should take time to understand the child's individual circumstances and remain professionally curious about any wider vulnerabilities or safeguarding concerns. Bullying or discrimination will not be tolerated.

Schools will not initiate action relating to social transition. Where a child or their parent/carer makes a request for support with social transition, this will be considered on an individual basis and in accordance with KCSIE. Social transition will be regarded as an active intervention and schools will

take a very careful approach when considering any such request. Individual members of staff must not make changes relating to social transition without an appropriate school-level decision having been made.

Where a child discusses feelings about their gender but does not request changes to how they are treated in school, staff should respond sensitively and maintain appropriate confidentiality. Information should not be disclosed solely because a child is questioning their gender, unless there is an associated safeguarding concern or another lawful reason to share it.

Where a request for support with social transition is made, the academy will undertake an individual, documented assessment of the child's needs and circumstances. This will consider safeguarding, wellbeing, parental involvement, any relevant clinical or professional advice, the impact on other children and the school's obligations under equality and human rights legislation. Decisions and agreed arrangements will be recorded and reviewed where appropriate.

Any arrangements relating to toilets, changing facilities, PE, sport or residential accommodation must comply with statutory requirements and Keeping Children Safe in Education. Schools will maintain accurate records of pupils' biological sex and consider appropriate alternative arrangements where required, ensuring that the safety, privacy and dignity of all children are protected.

Parents and carers will be actively involved in decision-making and their views given appropriate weight. Decisions will consider the best interests and safeguarding needs of the child and other children, alongside any relevant clinical or other professional advice, and the decision-making process will be appropriately documented.

Primary schools will exercise particular caution when considering requests for social transition; in accordance with KCSIE, support for full social transition in primary-aged children is expected to be agreed very rarely.

Where there is reason to believe that involving parents or carers would create a greater risk of harm to the child, the DSL must be consulted before parents are contacted or any decisions are made.

18. Support for staff

As part of their duty to safeguard and promote the welfare of children and young people, staff may hear information, either from the child/young person as part of a disclosure or from another adult, that will be upsetting. Where a member of staff is distressed as a result of dealing with a child protection concern, he/she should in the first instance speak to the DSL who will seek to signpost to the support that they require.

The welfare of all our staff is very important to us and in addition to the external support offered via the HR teams, the Trust also has a staff mental health first aid structure in place for all staff and a supervision structure for those who work within safeguarding. This includes regular supportive sessions with their line manager and external clinical supervision where required.

19. Complaints and concerns about school safeguarding policies.

Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

Other complaints

For any other form of complaint, we follow the procedures set out in the Trust Complaints Policy.

Whistleblowing concerns should be raised in accordance with the separate Trust Whistleblowing Policy. Concerns and allegations about adults working with children must follow the Trust Managing Allegations and Low-Level Concerns Policy and the safeguarding reporting routes in this policy.

20. Visitors

All visitors must report to academy reception on arrival, sign in using the academy's approved visitor management system and follow the academy's identification and lanyard procedures, except where immediate emergency action makes this impracticable.

The academy is responsible for confirming the identity, credentials and purpose of each visitor and deciding, in accordance with KCSIE and local risk assessment, whether supervision is required.

Academies will identify visitors who have been approved for unsupervised access through their local visitor identification system, after completing the relevant checks and authorisation.

Visitors who are not authorised for unsupervised access to children must remain accompanied in accordance with academy procedures and any relevant risk assessment.

Each academy is responsible for obtaining and retaining appropriate safeguarding checks or written assurances for agency staff, contractors and subcontractors, and for making relevant information accessible to staff who verify visitors. Records are held and managed at academy level. The Director of Safeguarding and Attendance provides strategic oversight through Trust quality assurance, not through a centrally managed contractor database.

For professional visitors, including social workers and local authority staff, each academy will verify identity and seek appropriate assurance of safeguarding checks where required by KCSIE and the visitor's role. The academy will record the assurance locally and assess any supervision requirements.

Police officers and emergency personnel should present identification and follow school sign-in arrangements where practicable; these administrative steps must not delay an urgent safeguarding or emergency response.

Whilst on site, visitors must not:

- Use personal devices in a way that compromises the safeguarding, privacy or confidentiality of pupils. Necessary professional use is permitted in accordance with academy procedures.
- Photograph, film or record children without express authorisation from the academy.
- Enter pupil toilets or changing facilities without a legitimate and authorised operational or safeguarding reason.

21. Training

All staff

All staff members will undertake safeguarding and child protection training at induction, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the 3 safeguarding partners.
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.
- Draw upon key policies that support our safeguarding processes and procedures.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
- Manage behaviour effectively to ensure a good and safe environment.
- Have a clear understanding of the needs of all pupils.

All staff will have Prevent Training to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

Volunteers will receive appropriate training, if applicable.

All staff will be made aware during training sessions that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will receive training on how these children's experiences can impact on their mental health, behaviour and education. The mental health lead for the school is listed above.

The DSL/DDSL

The DSL/DDSL will undertake child protection and safeguarding training at least every 2 years.

In addition, the DSL and DDSL will update their knowledge and skills regularly and at least annually, for example through briefings, professional networks and reading statutory developments. They will undertake appropriate Prevent training.

Governors

All governors and members of the Trust Board receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

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

22. Monitoring arrangements

This policy is reviewed annually, or in line with any changes to national guidance.

Appendix A - Specific safeguarding issues

Children who are absent from education

Our Trust recognises the entitlement that all children have to education and will work closely with the local authorities to share information about pupils who may be missing out on full-time education or who are absent from education. Knowing where children are during school hours is an extremely important aspect of Safeguarding. We monitor attendance carefully and address poor or irregular attendance without delay. Parents/carers should ensure that school has at least two emergency contacts for their child and that these are regularly reviewed to ensure they are up to date.

Staff should be aware that prolonged, repeated or unexplained absence, including persistent absence, may be an indicator of abuse, neglect, exploitation or other safeguarding concerns and should always be considered alongside the wider context of the child. A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. Children who attend an alternative education provision are more likely to be vulnerable to these forms of abuse.

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Each school in the Trust has a local Attendance Policy which sets out its procedures to ensure high standards of attendance and the appropriate safeguarding response.

Child sexual exploitation (CSE)/Child Criminal Exploitation (CCE)

These are both forms of abuse and both occur where an individual or a group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age can be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. Abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse 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. Victims can be exploited even when activity appears consensual and it can take place on and offline**.**

The experience of girls who are criminally exploited can be very different to that of boys. The indicators

may not be the same, however all staff working within the trust will have training to ensure they are aware of the risks to girls of criminal exploitation and also that both boys and girls who are criminally exploited are at higher risk of sexual exploitation.

CSE is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media. CSE can affect any child, and this includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited and may feel they are in a genuine romantic relationship.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point or are targeted by criminals involved in the illegal supply of drugs (County Lines). This term is used to describe organised networks involved in exporting illegal drugs into one of more importing areas within the UK, using dedicated mobile phone lines. Exploitation is an integral part of this with children and vulnerable adults exploited to move and store both drugs and money. Staff training includes raising awareness of these issues.

Staff should be aware of the indicators associated with serious violence and recognise that involvement may be linked to criminal exploitation, county lines, peer influence, coercion or other safeguarding concerns. Concerns should be reported to the DSL in accordance with this policy. Any concerns are passed to the DSL who will make a risk assessment and refer to Children's social care if appropriate.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

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

Where the academy receives an Operation Encompass notification, the DSL will ensure that the notification and any necessary safeguarding response are recorded on the academy's approved safeguarding recording system.

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

Parental Conflict while not directly Domestic Abuse is defined as conflict that is frequent, intense and unresolved or damaging. This can include unresolved arguing, silence, lack of respect or lack of resolution which can have a significant impact on the children and their mental health and their outcomes. Where staff have concerns about parental conflict, this should be reported to the DSL for further assessment about the level of harm.

Homelessness

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

The DSL/DDSL is aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

This encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of this are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

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

The 'recognising abuse and taking action' section of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

A girl who is:

Having difficulty walking, sitting or standing, or looking uncomfortable

- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Having frequent urinary, menstrual or stomach problems.
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period.
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
- Being reluctant to undergo any medical examinations.

- Asking for help, but not being explicit about the problem.
- Talking about pain or discomfort between her legs.

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

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

A girl:

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

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have one chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the local authority's designated. officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fcdo.gov.uk.
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Serious violence

All staff are made aware of indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals, a significant decline in academic performance, signs of self-harm and/or significant changes in well-being.

All staff will be made aware of the range of risk factors which increase the likelihood of involvement with serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced previous child abuse and having been involved in offending.

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Private Fostering Arrangements

Where a child under the age of 16 (or 18 with a disability) is living with someone who is not their family or a close relative for 28 days or more, staff must inform the DSL so that a referral can be made to Children's social care for a suitability check. A close relative includes a step-parent, grandparents, uncle, aunt or sibling.

Fabricated Induced Illness (FII)

Is a form of child abuse and it occurs when a parent or carer exaggerates or deliberately causes symptoms of illness in the child. The parent/carer may present the child as ill when they are health, deliberately induce symptoms of illness, manipulate test results, or exaggerate or lie about symptoms. FII is child abuse and will be reported as such to social care, in line with local procedures.

Child Trafficking

Child Trafficking is a form of modern slavery. It's defined as recruiting, moving, receiving and harbouring children for the purposes of exploitation. Child trafficking is a form of modern slavery. Children are trafficked for many reasons, some for child sexual exploitation, others for forced labour, and criminal activity and forced marriage. Children who are trafficked are often exploited in more than one way. Children may be groomed, tricked or persuaded to leave their homes to be trafficked, and child trafficking often involves networks of organised criminals as well as individuals and children's own families. Child trafficking is child abuse and the response to any concern of child trafficking will be a child protection multi agency one in line with current legislation.

Appendix B

The safeguarding scenarios below must be reported to the Trust as soon as practicable so that academies can access advice and support. If an incident is not listed but presents a significant concern, staff should contact the Director of Safeguarding and Attendance or the Chief Executive Officer promptly. Whistleblowing concerns follow the separate Trust Whistleblowing Policy.

scenario	Details to be shared	Person to contact
LADO referral of a member of staff	Reason for the LADO referral and pdf of LADO contact form	Lauren Newport Claire Shaw
Pupil leaving school without permission e.g. flight risk pupil	Any current risk assessment Synopsis of incident academy safeguarding record log	Lauren Newport Claire Shaw
Consideration of permanent exclusion. Contact the Trust before a decision is relayed to parents and carers.	Synopsis of incident Any relevant academy safeguarding record log/behaviour log	Claire Shaw Lauren Newport James Macdonald
Use of part time timetable for a pupil with safeguarding concerns	Details of reasons Relevant paperwork	Lauren Newport Claire Shaw
Police on site to talk to a pupil (Please see additional guidance sent separately and previously around police coming to school)	Reason for police being on site	Lauren Newport Claire Shaw
Police on site to talk to a member of staff as a suspect or to arrest a member of staff	Reason for police being on site	Lauren Newport Claire Shaw
Full or partial lockdown (Not practice drills)	Reason for lockdown	Lauren Newport Claire Shaw James Macdonald

Fire at school	Details of incident and response	Lauren Newport Claire Shaw James Macdonald Colin Strawbridge

Serious or reoccurring incidents of parental abuse towards staff including via phone, email, social media or face to face	Details of incident and response	Lauren Newport Claire Shaw James Macdonald
Serious injury towards a pupil, parent, adult or member of staff involving a 999 call being made and an ambulance/paramedic attending school	Details of incident and response	Lauren Newport Claire Shaw
Serious incident in the vicinity of school which has affected school pupils or staff e.g. flood, serious traffic accident, fire etc	Details of incident and response	Lauren Newport Claire Shaw James Macdonald
scenario	**Details to be shared**	**Person to contact**
Loss of member of staff or pupil(with permission and consultation with next of kin)	Details of incident and response	Claire Shaw Lauren Newport James Macdonald
Significant concern about safeguarding in external AP provision	Details of incident and response	Lauren Newport Claire Shaw
Consideration of Prevent referral	Details of incident and response	Lauren Newport Claire Shaw
significant online safety concern or significant breach by pupils/staff of filtering /monitoring policies and relevant codes of conduct/acceptable use agreements	Details of incident and response	Paul Bedford Lauren Newport

Significant concern about safeguarding for an outside provider using school premises or a contractor on school site	Details of incident and response	Lauren Newport Claire Shaw

Any incident that requires police to attend school that is not a planned assembly or PCSO visit. E.g. after a physical altercation between parents, intruder on site etc,	Details of incident and response	Lauren Newport Claire Shaw

Telephone the relevant member of the Trust team as soon as practicable. Then complete the form below and send it securely to the relevant Trust contact.

Appendix C

Confidential reporting form for a safeguarding related incident

School name	
Date and time of incident	
Name of member of staff reporting	
Scenario	
Details of school response	
Support school needs	