Safeguarding and Child Protection Policy (2026–27)

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Description of Changes	**Safeguarding Policy Key Updates (V4 2025 → V5 2026)** • **Rebrand & Governance Alignment (Section 1):** All policy references updated from DEMAT to Grace Schools, and all governor references updated to Regional Schools Board (RSB). • **Mandatory Full Reading of Part One (Section 1):** Annex A removed by DfE. All staff must read Part One in full. • **Terminology Shift (Family Help & Image Sharing) (Sections 3.1 & 3.6):** Replaced "Early Help" with "Family Help". Replaced "sexting" with "making or sharing of nudes or semi-nudes" (including AI deepfakes). • **Looked-After Children (LAC) & PEP Coordination (Section 4.10):** Expanded Designated Teacher responsibilities, termly

	Personal Education Plan (PEP) reviews, and explicit partnership working with the Virtual School Head (VSH). ● **Single-Sex Spaces & Gender-Questioning Pupils (Sections 4.15 & 4.16):** Added formal framework for single-sex toilets/changing rooms and decision-making protocols for social transition requests. ● **Generative AI, Deepfakes & The 4Cs Framework (Section 4.17):** Explicit safeguards for AI-generated abuse, deepfakes, and online misogyny, fully integrated into the DfE 4Cs framework (*Content, Contact, Conduct, Commerce*). ● **Mental Health Crisis Pathways (Section 4.18):** Explicit protocols including emergency 999 and NHS 111 (Option 2) escalation. ● **Elective Home Education (EHE) Safeguarding (Section 4.19):** Mandatory pre-off-rolling multi-agency meetings with the Local Authority, social care, and involved professionals for vulnerable pupils before off-rolling to EHE. ● **External Whistleblowing Pathways (Section 5):** Formal integration of the national NSPCC Whistleblowing Helpline contact details (0800 028 0285 / help@nspcc.org.uk) as an explicit external reporting route. ● **Volunteer DBS Checks (Crime and Policing Act 2026) (Section 5.3):** Supervision exemption removed. Regular volunteers teaching/supervising children require an Enhanced DBS with Barred List check regardless of supervision. ● **Annual Filtering & Monitoring Effectiveness Review (Section 7):** Mandated formal written annual reviews led by SLT, DSL, and IT. ● **Statutory Allergy Safety & Anaphylaxis - Benedict's Law (Section 11):** Implementation of mandatory standalone whole-school allergy policy, annual staff-wide anaphylaxis response training, stocked emergency Adrenaline Auto-Injectors (AAIs) accessible for immediate emergency use (including undiagnosed acute cases), and mandatory IHPs with regular emergency drill auditing.

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1. Aims and Purpose

Grace Schools is committed to ensuring that every child who is a registered pupil at any of our schools is safe and protected from harm. This policy sets out the Trust's safeguarding aims, ethos, and expectations, and clarifies the roles and responsibilities of the Trust and of each school within it.

Each school adopts this Trust policy and supplements it with school-specific procedures. These procedures provide clear direction to staff, volunteers, visitors, and parents/carers about expected conduct and the legal duty to safeguard and promote the welfare of all children to:

- Identify concerns early to prevent them from escalating.
- Provide a safe environment in which children can learn.
- Identify children who may benefit from universal services, community-based early help, or targeted Family Help.
- Know what to do if a child discloses abuse, neglect, or exploitation.
- Follow referral processes without delay when there is a concern.

Grace Schools recognises its responsibilities under Section 175 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014 to safeguard and promote the welfare of children.

Safeguarding and promoting the welfare of children is everyone's responsibility. For the purposes of this policy, 'children' means anyone under the age of 18.

This policy must be read alongside statutory guidance, in particular *Keeping Children Safe in Education* (KCSIE 2026). Following the withdrawal of Annex A in KCSIE 2026, **it is a mandatory statutory expectation that ALL staff (teaching and non-teaching, paid and unpaid) read Part One in full**.

The DfE document *Part One: Overview for All Staff* may be used as a supplementary reference tool, but does not replace reading Part One in full. Furthermore, all staff who work directly with

children and every Regional Schools Board (RSB) member must read Annex B. This policy applies to all staff, trustees, RSB members, contractors, trainee teachers, and volunteers. Parents/carers may also raise concerns directly with the school or Regional Schools Board (RSB).

There are four core elements to our safeguarding approach:

- **Prevention** – high-quality teaching, pastoral care, and a whole-school protective ethos.
- **Procedures** – clear processes for identifying and referring cases of abuse, harm, or exploitation.
- **Supporting Children** – targeted support for those who have been abused, exposed to harm, or require mental health interventions.
- **Preventing Unsuitable People from Working with Children** – robust safer recruitment and conduct processes.

This policy is available on the Grace Schools website and all individual school websites.

2. Prevention

We recognise that children with high self-esteem, strong peer relationships, and trusted adults to talk to are better protected. Accordingly, each Grace Schools school will:

- Maintain environments, on site and online, where children feel safe, are encouraged to talk, and are listened to.
- Ensure children know who the trusted adults are and that concerns will be taken seriously and acted upon.
- Provide an age-and stage-appropriate curriculum, tailored to specific needs and vulnerabilities, including those of children with SEND and children who have experienced abuse.
- Embed learning that challenges stereotyping, prejudice, misogyny, misandry, and inequality.
- Challenge prejudice-related behaviour (e.g., sexism, online misogyny, homophobia, biphobia, sexual harassment/violence).
- Teach pupils how to stay safe from abuse, generative AI risks, deepfakes, and exploitation in all contexts, reflecting current RSE and online safety guidance.

Pupils will learn about:

- The importance of families in providing love, security, and stability; recognising unsafe family relationships and how to seek help.
- Healthy, welcoming friendships; recognising when friendships or peer interactions are harmful and how to seek support.
- How and where to seek help, including when facing violence, domestic abuse,

child-to-parent abuse, or harm.
- Critical evaluation of online relationships and content; risks of interacting with unknown people or AI chatbots online; recognising and reporting harmful content or contact.
- Body autonomy; appropriate vs. inappropriate contact; responding safely to unknown adults (online and offline).
- How to report abuse, including non-consensual image sharing or deepfake content, with the vocabulary and confidence to do so.

Grace Schools utilise approved PSHE schemes, Personal Safety Units, and the Safer Spaces Toolkit to deepen children's understanding of sexist/misogynistic language, attitudes, and behaviours.

3. Procedures

All Grace Schools follow their Local Authority Safeguarding Partnership procedures and Trust-wide requirements set out in the Headteachers' Handbook. Each school will:

- Appoint a Designated Safeguarding Lead (DSL) with lead responsibility for safeguarding and child protection. Appropriately trained Deputy DSLs (DDSLs) may be appointed; however, overall statutory accountability remains with the Headteacher/DSL. Every Headteacher is a fully trained DSL.
- Ensure DSL/DDSL roles are explicit in job descriptions (KCSIE 2026 Annex C).
- Provide the DSL with sufficient status, authority, time, funding, training, and resources; ensure completion of the Local Authority two-day DSL training (refreshed at least every two years).
- Provide annual updates- for DSLs/DDSLs (e.g., Grace Schools DSL Network meetings) and all staff.
- Ensure all staff and RSB members know who the DSL/DDSLs are from induction onwards. Staff must alert the DSL/DDSL verbally and immediately log concerns on CPOMS.
- Ensure the DSL or a DDSL is available during school hours in term time, with clear, written contingency arrangements in place (Appendix B).
- Liaise with the three safeguarding partners (Local Authority, Integrated Care Board, and Police) in line with *Working Together to Safeguard Children*.
- Nominate a trained safeguarding RSB member.

All trustees, staff, and RSB members must know:

- The names and roles of the DSL/DDSLs.
- Signs of abuse, neglect, exploitation, and harmful subcultures (online and offline).
- That children may not be ready or able to disclose abuse or recognise it as harmful.

- How to pass on and record concerns, and their individual duty to refer to the DSL/DDSL or external agencies.
- The importance of professional curiosity.
- Expectations for filtering and monitoring, including participating in mandatory annual effectiveness reviews.

All staff receive safeguarding training at induction, updates each term (including online safety, AI risks, and filtering/monitoring roles) and full refreshers training at least annually thereafter. Whistleblowing pathways are clearly maintained.

3.1 Multi-Agency Working

The Headteacher is responsible for the following commitments:

- Develop effective links with relevant local services to promote pupil safety and welfare.
- Cooperate with key agencies under *Working Together to Safeguard Children*, including referrals to universal services, community-based early help, and targeted Family Help.
- Notify Social Care immediately if a pupil subject to a Child Protection Plan or Family Help Plan is suspended, excluded, persistently absent, or experiences significant changes in circumstances.
- Transfer safeguarding records promptly when a pupil leaves the school.

3.2 Record Keeping

All Grace Schools use CPOMS to record safeguarding information securely. CPOMS is for recording, not reporting: all safeguarding concerns must be reported to DSLs verbally and in person immediately without relying solely on CPOMS alerts.

Schools keep clear, detailed, accurate written records even when a referral to Social Care/Family Help is not immediately made. Records include:

- A clear, objective summary of the concern.
- The child's wishes and feelings.
- How the concern was followed up and resolved.
- Decisions reached, rationales, and communications with parents and external agencies.

When a pupil moves schools, relevant safeguarding records are transferred to the receiving school within 5 working days in accordance with KCSIE 2026.

3.3 Confidentiality and Information Sharing

Information about children and families constitutes 'special category data' governed by the Data

Protection Act 2018, UK GDPR, and the Data (Use and Access) Act 2025. Staff adhere to confidentiality protocols and share information in line with DfE *Information Sharing* guidance.

- Subject Access Requests are referred immediately to the Data Protection Officer, DSL, and Headteacher.
- Staff cannot promise absolute confidentiality to a child disclosing abuse or harm.
- The DSL/DDSL shares information on a 'need-to-know' basis. Where data withholding is necessary to prevent serious harm, rationales are formally recorded under data protection laws.

3.4 Communication with Parents/Carers

- Safeguarding duties are published transparently on school websites.
- Appropriate discussions are held with parents/carers prior to external agency involvement, unless doing so would place the child or others at immediate risk of harm or prejudice a police investigation.
- All rationales regarding parental engagement are formally logged.

3.5 Child-on-Child Abuse

Child-on-child abuse occurs inside and outside school and online. It includes bullying (including cyber, prejudice-based, and discriminatory), intimate peer abuse, child-to-parent abuse, physical violence, harmful sexual behaviour (HSB), sexual harassment, sexual violence, child sexual exploitation (CSE), child criminal exploitation (CCE), racism, and initiation/hazing.

All forms are unacceptable and will be taken seriously:

- Maintain a zero-tolerance approach; never dismiss incidents as 'banter' or 'growing up'.
- Recognise that harmful sexual behaviour (HSB) operates along a continuum leading into sexual harassment and violence.
- Be alert to elevated risks for girls, SEND pupils, and pupils who are LGB or gender-questioning.
- Recognize intrafamilial harms (including child-to-parent abuse) and support siblings.
- Refer to Local Authority tools if sexually harmful behaviour is suspected.

3.6 Dealing with Sexual Violence and Sexual Harassment Between Children

Such behaviours can occur between any children and may take place online and/or face-to-face, including group contexts. They are never acceptable. Staff and RSB members must follow KCSIE 2026 Part Five and DfE guidance on *Making or Sharing of Nudes or Semi-Nudes*.

- **Mandatory Safeguarding Response:** Any incident involving the making, holding, or sharing of nude or semi-nude images (including digitally altered images, AI-generated content, or deepfakes) requires a formal safeguarding response, regardless of whether the sharing was consensual or non-consensual.
- Manage reports on a case-by-case basis, reassuring and supporting victims while implementing dynamic risk assessments for all involved parties.
- Implement and review risk assessments for victims, alleged perpetrators and others as needed.
- Liaise closely with police and social care where required.

4. Supporting Children

Mental health concerns can be a direct indicator of actual or potential abuse, neglect, or exploitation. Headteachers ensure pupils are supported through coordinated pastoral systems, the Senior Mental Health Lead, and multi-agency referral pathways.

4.1 Children with Disabilities, Health Conditions or SEND

Children with SEND or communication difficulties face increased vulnerability. Staff maintain high vigilance, adapting safety education (e.g., using PECS/Makaton) and making reasonable adjustments under the Equality Act 2010.

4.2 Young Carers

Schools identify and support young carers, ensuring workload/attendance pressures are accommodated and referring to local young carers' services or Family Help where appropriate.

4.3 Children at Risk of Criminal Exploitation (CCE)

CCE (including county lines and gang activity) is abuse. DSLs utilise Local Authority screening tools, monitor repeated missing episodes, and refer cases immediately to Social Care or Family Help.

4.4 Children at Risk of Sexual Exploitation (CSE)

CSE involves power imbalances and can occur offline or online. All Grace Schools participate in **Operation Encompass**, working with police to support children affected by domestic or community incidents.

4.5 Children Persistently Absent from Education

Persistent absence signals safeguarding risks (abuse, neglect, FGM, forced marriage, county lines). Attendance is tracked closely; schools maintain multiple emergency contact details per pupil and follow Children Missing Education (CME) protocols.

4.6 Children Misusing Drugs or Alcohol

Substance misuse creates vulnerability to exploitation and physical harm. DSLs coordinate specialist targeted support or medical interventions.

4.7 Children Living with Substance-Misusing Parents/Carers

Parental substance misuse poses severe risks of neglect and trauma. Concerns trigger immediate early help/Family Help assessments or Social Care referrals.

4.8 Children Living with Domestic Abuse

Under the Domestic Abuse Act 2021, children seeing, hearing, or experiencing domestic abuse are victims. Operation Encompass notifications are processed immediately by the DSL/Domestic Abuse Lead.

4.9 Children at Risk of Honour-Based Abuse (HBA, FGM, Forced Marriage)

HBA encompasses forced marriage and FGM. Under the Marriage and Civil Partnership (Minimum Age) Act 2022, facilitating child marriage under age 18 is illegal. Teachers have a statutory personal duty to report known cases of FGM in under-18s directly to the police.

4.10 Looked-After Children (LAC), Previously Looked-After Children (PLAC) and Children Returned Home from Care

Looked-After Children (LAC) and Previously Looked-After Children (PLAC) are inherently vulnerable due to experiences of trauma, loss, or abuse. Each Grace School maintains a designated teacher for LAC and PLAC who collaborates closely with the Designated Safeguarding Lead (DSL) and relevant Local Authority Virtual School Head (VSH).

- **Personal Education Plans (PEPs):** For every Looked-After Child, the school maintains an up-to-date Personal Education Plan (PEP) integrated into the pupil's care plan, with statutory PEP reviews conducted termly alongside the VSH and social worker.
- **Pastoral Support & Monitoring:** The Designated Teacher ensures tailored academic and pastoral interventions are implemented to mitigate recurring educational or developmental vulnerabilities.

- **Children Returned Home:** Children returning home from care remain subject to elevated monitoring to ensure safety and stability during family reunification.

4.11 Children Showing Signs of Abuse, Neglect and/or Exploitation

Staff assess risks inside and outside the home (extrafamilial harm, serious youth violence, online misogyny) and report concerns promptly.

4.12 Children at Risk of Radicalisation (Prevent Duty)

All staff undergo Prevent training to spot signs of extreme ideologies (including far-right extremism, Islamist extremism, and extreme misogynistic/incel subcultures). Referrals follow the National Prevent Referral Form.

4.13 Privately Fostered Children

Arrangements where a child under 16 (under 18 if disabled) is cared for by a non-close relative for 28+ days must be formally notified to the Local Authority.

4.14 Children with Family Members in Prison

Grace Schools offer confidential, non-judgmental support to children with incarcerated family members to mitigate stigma and mental health impacts.

4.15 Single-Sex Spaces, Facilities and Accommodation

In accordance with the *School Premises (England) Regulations*, the Equality Act 2010, and DfE statutory guidance, Grace Schools maintain single-sex spaces to guarantee the privacy, dignity, and safety of all pupils:

- **Toilets:** Separate single-sex toilet facilities are provided for male and female pupils aged 8 and over. Where unisex/gender-neutral toilets are provided, they must consist of fully enclosed individual cubicles with floor-to-ceiling walls and internal handwashing facilities.
- **Changing Rooms & PE:** Single-sex changing facilities are provided for physical education and sports.
- **Residential Trips & Boarding:** Overnight accommodation and sanitary facilities on school trips must be strictly segregated by biological sex, with separate provisions for staff.
- **Privacy and Dignity:** Access to single-sex spaces is maintained to protect physical safety and privacy.

4.16 Gender-Questioning Children and Social Transition Requests

Schools follow the DfE framework when responding to pupils questioning their gender or requesting social transition (e.g., changes to names, pronouns, or uniforms):

- **Parental Involvement:** Parents/carers must be involved in decisions regarding social transition, except in rare circumstances where involving parents would create a significant risk of severe harm to the child.
- **Decision-Making Process:** Headteachers assess requests individually, taking into account the child's age, developmental stage, physical and mental health, and the impact on the wider school community.
- **Facilities:** Pupils must use the single-sex toilets and changing facilities designated for their biological sex. If a gender-questioning child declines to use single-sex facilities matching their biological sex, the school may provide access to a separate, single-occupancy unisex facility (such as an accessible toilet).

4.17 Generative AI, Digital Risks, Deepfakes & The 4Cs Framework

Technological risks evolve rapidly. To ensure robust online safety, Grace Schools integrates the DfE **4Cs of Online Safety** across all educational and digital risk management practices:

- **Content:** Exposure to illegal, inappropriate, or harmful material, including self-harm, radicalisation, online misogyny, or extreme subcultures.
- **Contact:** Exposure to harmful interaction, including grooming, exploitation, or simulated human interactions via generative AI tools and chatbots.
- **Conduct:** Personal behavior that contributes to harm, including cyberbullying, harassment, or the making, requesting, holding, or sharing of nude or semi-nude images.
- **Commerce:** Exposure to financial harm, including predatory online marketing, illegal gambling, or extortion.

Staff and pupils must be equipped to respond to AI-facilitated harms:

- **AI-Generated Nudes & Deepfakes:** Creating, requesting, holding, or sharing AI-generated nude or semi-nude images/videos of minors is illegal and constitutes child abuse. Any occurrence will be treated as a severe safeguarding incident.
- **Generative AI Use:** The use of generative AI tools and chatbots within schools must comply with Trust Online Safety and Acceptable Use Policies. Pupils are taught the risks of simulated human interactions and data privacy risks.

4.18 Mental Health Safeguarding Protocols

Mental health concerns must be evaluated through a safeguarding lens.

- **Recognising Escalation:** Staff must report sudden changes in behaviour, severe distress, self-harm, or suicidal ideation to the DSL immediately.

- **Emergency Crisis Pathways:**
    - If a pupil is in immediate physical danger or has self-harmed severely, staff must call **999** or transport the child to A&E under supervision.
    - For urgent mental health crises not posing immediate life threat, staff contact the local NHS Mental Health Crisis Team via **111 (Option 2)**.
    - Cases requiring non-urgent mental health intervention are escalated to the Senior Mental Health Lead and referred to CAMHS or Family Help.

4.19 Children Moving to Elective Home Education (EHE)

When a parent or carer expresses an intention to remove a child from the school roll to provide Elective Home Education (EHE), the school must take proactive safeguarding steps prior to off-rolling:

- **Local Authority Liaison:** The Headteacher/DSL must notify the Local Authority EHE team immediately upon receiving written or verbal notification from parents.
- **Pre-Off-Rolling Multi-Agency Meetings:** Where a child is subject to a Child Protection Plan, Child in Need Plan, Family Help Plan, or has identified SEND/safeguarding vulnerabilities, the school must convene a multi-agency meeting with the Local Authority, social care, and involved professionals before removing the pupil from roll.
- **Off-Rolling Compliance:** A pupil may only be off-rolled in full compliance with the Education (Pupil Registration) (England) Regulations and after ensuring local Children Missing Education (CME) and EHE procedures have been executed.

5. Preventing Unsuitable People from Working with Children

Safer recruitment practices comply with KCSIE 2026 Part Three, the Trust's Recruitment Policy, and relevant employment legislation. At least one panel member must hold current Safer Recruitment training. All pre-employment checks (identity, DBS, Barred List, prohibition orders via "Check a teacher's record", overseas checks, right to work) are completed before employment commences. Where checks are delayed a risk assessment is completed and signed by the schools and agreed by the Hub Director.

5.1 Allegations that Meet the Harms Threshold (KCSIE 2026 Part Four, Section One)

Allegations against staff, supply workers, contractors, or volunteers meeting the harms threshold are reported immediately to the Headteacher.

- **Allegations against Headteachers/CEO/RSB members:**
    - If against a Headteacher or CEO: refer to the Director of

People(people@graceschools.org.uk), who informs the CEO (for Headteacher allegations) or Chair of Trustees (for CEO allegations).
    - If against an RSB member or trustee: refer to the Director of People (people@graceschools.org.uk), who informs the CEO.
- The case manager consults the Local Authority Designated Officer (LADO) within one working day.
- Fact-finding is conducted without compromising potential police investigations.
- Disciplinary processes are concluded even if the individual resigns, and statutory referrals to the DBS and/or Teaching Regulation Agency (TRA) are made where criteria are met.

While staff are encouraged to resolve concerns internally and must use Trust reporting pathways, any staff member who feels unable to raise a safeguarding concern internally, or who feels that an internal concern has not been acted upon appropriately, can contact the national **NSPCC Whistleblowing Helpline** directly:

- **Telephone:** 0800 028 0285
- **Email:** help@nspcc.org.uk

5.2 Concerns that Do Not Meet the Harms Threshold (Low-Level Concerns) (KCSIE 2026 Part Four, Section Two)

Low-level concerns are handled under the Grace Schools Low-Level Concerns Policy.

- A low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Code of Conduct, but does not meet the harms threshold.
- Low-level concerns about a Headteacher are reported to the school Hub Director and notified to people@graceschools.org.uk.
- All records are kept confidential, reviewed by the People Team to spot patterns, and stored securely under data protection laws.

5.3 Volunteers and Removal of Supervision Exemption

Under the Crime and Policing Act 2026, **the 'supervision exemption' from regulated activity has been removed**.

- Any volunteer undertaking teaching, training, instructing, caring for, or supervising children on a regular basis (more than 3 days in a 30-day period, or overnight) **is in regulated activity**, regardless of whether they are supervised by a member of staff.
- All volunteers in regulated activity **must undergo an Enhanced DBS check with Children's Barred List information** prior to starting their role. Unchecked volunteers must never be left unsupervised with children.

5.4 Trainee Teachers

Trainee teachers (whether salaried or unsalaried) are subject to full safer recruitment checks. Salaried trainees are checked by the Trust; unsalaried trainees' checks are verified via written assurance from the Initial Teacher Training (ITT) provider. Allegations involving trainee teachers follow LADO processes and are coordinated with the ITT provider.

6. Other Related Policies and Procedures

This policy operates alongside:

- Attendance (including Children Absent from Education)
- Behaviour & Anti-Bullying
- Code of Conduct & Low-Level Concerns Policy
- Complaints & Whistleblowing
- Health, Safety & Critical Incident Plan
- Online Safety, Acceptable Use & Cyber Security Policy
- Safer Recruitment Policy
- Single-Sex Spaces & Gender-Questioning Guidance

6.1 Use of Mobile Phones and Other Smart Devices

In accordance with DfE statutory guidance *Mobile Phones in Schools*, all Grace Schools settings operate as **mobile phone-free environments for pupils** during the school day. Smartwatches and smart devices capable of image recording or internet access are restricted. EYFS settings strictly enforce Section 3 of the EYFS Statutory Framework prohibiting unauthorised personal smart devices in early years environments.

7. Trustees' Responsibilities for Safeguarding

The Grace Schools Board of Trustees holds overall accountability for safeguarding across the Trust. Trustees will:

- Approve and review the Trust-wide Safeguarding Policy annually.
- Ensure all Trustees and RSB members receive safeguarding and online safety training at induction and regular updates.
- Appoint a Lead Safeguarding Trustee to meet termly with the Trust Safeguarding Lead.
- **Mandatory Annual Safeguarding Review and Review of Filtering and Monitoring:** Ensure that each school receives an Annual Safeguarding Review with follow up visits to ensure any actions are complete. Schools should also conduct a formal annual review of the effectiveness of its filtering and monitoring systems. (led by the SLT lead, DSL, and

digital team support) The Safeguarding Lead, Head of IT receives written reports of the outcomes.

- Ensure this Trust policy is published on the school website.
- Ensure age-appropriate filtering and monitoring systems are in place and regularly reviewed.

8. Regional Schools Board (RSB) Safeguarding Responsibilities

Regional Schools Boards (RSBs) facilitate a whole-Trust line of sight into safeguarding as a link between the Trust Board, Hub Directors and Schools. All systems must operate in the best interests of the child. Through termly Hub Director monitoring reports, RSBs assure themselves that school procedures and training are effective and compliant.

- Nominate a trained safeguarding RSB member to monitor school arrangements in line with the Regional Schools Board Terms of Reference.
- Ensure awareness of obligations under the Human Rights Act 1998, Equality Act 2010, the Public Sector Equality Duty, and local multi-agency arrangements.
- Receive termly Safeguarding Hub Director Monitoring Forms, attendance analytics, Annual Safeguarding Reviews, and relevant school/LA safeguarding reports.

9. Use of school Premises for Non-School Activities

Where activities are provided by external organisations on school sites, the DSL obtains written assurance regarding safer recruitment and safeguarding procedures in line with DfE *Out-of-School Settings* guidance. Safeguarding non-compliance is an explicit ground for immediate termination of hire agreements.

10. Preparing for Martyn's Law (Protect Duty)

To ensure physical security against terrorism or serious threats, each Headteacher will:

- Maintain a context-specific terrorism risk assessment and proportionate security plan.
- Conduct and log **termly drills** for evacuation, invacuation, and lockdown on Smartlog.
- Maintain reliable emergency communication systems and deliver staff threat-awareness training.

Section 11: Statutory Allergy Safety & Anaphylaxis Protocols (Benedict's Law)

In compliance with statutory guidance introduced under Benedict's Law (Children's Wellbeing and Schools Act 2026), Grace Schools maintains a zero-tolerance approach to unmanaged allergen exposure and establishes mandatory protocols to prevent and respond to anaphylaxis across all school sites.

11.1 Policy Oversight & Governance

- Grace Schools maintains a standalone, publicly accessible Whole-Trust Allergy Policy, reviewed annually and kept separate from general medical conditions policies.
- In each school, a designated member of the Senior Leadership Team (SLT) acts as Allergy Lead and oversees policy implementation, environmental risk management, and the tracking of all allergy incidents and "near misses".

11.2 Mandatory Staff Training & Awareness

- Annual allergy awareness and anaphylaxis response training is compulsory for all school staff present on site, including teaching, administrative, catering, cleaning, and lunchtime supervision personnel.
- Staff training covers early symptom recognition, allergen avoidance strategies, emergency escalation protocols, and practical administration of Adrenaline Auto-Injectors (AAIs).

11.3 Emergency Adrenaline Auto-Injectors (AAIs)

- The school holds a stocked, regularly audited supply of spare emergency AAIs stored in unlocked, easily accessible locations across the site.
- Spare AAIs may be administered in an acute emergency to any pupil or adult displaying signs of anaphylaxis within a 5-minute critical response window, including pupils without a prior formal diagnosis.

11.4 Individual Healthcare Plans (IHPs) & Risk Mapping

- Up-to-date IHPs are mandatory for every pupil with an identified allergy, detailing specific allergens, physiological symptoms, prescribed medication, and emergency escalation procedures.
- Allergy risk controls are directly integrated into health and safety risk assessments for

classroom practicals, school dining, curriculum activities, and off-site educational visits.

11.5 Inclusion, Peer Culture, & Emergency Drills

- Policy arrangements ensure that pupils living with allergies participate fully in all meals, trips, and extracurricular activities without stigma, segregation, or peer isolation.
- The school conducts periodic simulated emergency allergy drills to audit response times, verify AAI accessibility, and test staff confidence during acute health emergencies.

Appendix A: Categories of Abuse, Neglect and Exploitation

- **Abuse:** A form of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm includes ill-treatment, witnessing domestic abuse, or child-to-parent abuse. Abuse occurs offline or online.
- **Physical Abuse:** Hitting, shaking, throwing, burning, drowning, suffocating, or fabricating/inducing illness.
- **Neglect:** Persistent failure to meet basic physical, medical, educational, or emotional needs.
- **Emotional Abuse:** Persistent emotional maltreatment causing severe adverse impacts, including persistent verbal abuse, name-calling, belittling, or exposure to domestic violence.
- **Sexual Abuse:** Forcing or enticing a child to engage in sexual activities. Includes physical contact, non-contact acts, grooming, or making/sharing nudes/semi-nudes (including AI-generated deepfakes).
- **Assault by Penetration:** Defined legally as rape or penetration with an object.
- **Child Criminal Exploitation (CCE) & CSE:** Coercing or manipulating a child into criminal acts (e.g., county lines) or sexual activity in exchange for gifts, status, or protection.
- **Risks Outside the Home (Extrafamilial Harm):** Contextual harms including criminal gangs, trafficking, online abuse, radicalisation, and harmful online subcultures (such as extreme misogyny).

Appendix B: Relevant Documents & Statutory Guidance

- **DfE:** Keeping Children Safe in Education (KCSIE, September 2026)
- **DfE:** Part One: Overview for All Staff (September 2026)
- **DfE:** Working Together to Safeguard Children (2026)

- **DfE:** Making or Sharing of Nudes and Semi-Nudes: Advice for Education Settings (2026)
- **DfE:** Gender-Questioning Pupils: Guidance for Schools and Colleges
- **DfE:** Mobile Phones in Schools Statutory Guidance (2026)
- **DfE:** Allergy Safety in Schools Statutory Guidance (Benedict's Law, September 2026)
- **DfE:** Promoting the Education of Looked-After Children and Previously Looked-After Children
- **DfE:** Children Missing Education (CME)
- **DfE:** Elective Home Education: Guidance for Local Authorities
- **DfE:** Information Sharing Advice for Safeguarding Practitioners
- **DfE / NSPCC:** Whistleblowing Advice for Employees
- **HM Government:** Prevent Duty Guidance for England and Wales
- **Home Office:** Terrorism (Protection of Premises) Act 2025 (Martyn's Law)
- **Home Office:** Crime and Policing Act 2026 (Regulated Activity & Volunteers)
- **UK Parliament:** Data (Use and Access) Act 2025 & UK GDPR

Creating the foundations to build successful futures

"We can do all things through Christ who strengthens us" (Philippians 4:13)