Woodmansterne Primary School

Child Protection & Safeguarding Policy (from 1st September 2025)

Bourne Education Trust

Transforming schools... changing lives

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Statement of intent

The Bourne Education Trust and Woodmansterne Primary School are committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of our schools' premises. We implement a trust-wide preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken and that healthy relationships are promoted. The trust is also committed to a zero-tolerance policy with regards to sexual harassment and violence.

This policy has been created to outline a clear framework relating to any aspects of safeguarding within the trust and should be followed by:

- All members of staff.
- Any school within the trust.
- Any local governing committees and committees of the trust.
- Individual trustees and the board of trustees.
- The trust as a whole, including trust staff.

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

- Ensuring that members of the board of trustees, headteachers and trust and school staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to an appropriately trained person, e.g. the DSL or deputy DSL (DDSL) within their school.
- Ensuring pupils are taught how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil who has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that headteachers and any new staff and volunteers within the trust are only appointed once all the appropriate checks have been satisfactorily completed.

1. Acronyms

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act 2018.

DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	The UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.

LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the UK and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in LA care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs and disabilities (SEND) policy and provision of education to pupils with SEND.

SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads oversee promoting the educational achievement of all the children looked after by the LA they work for, and all children who currently have, or previously had, a social worker.

2. Definitions

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

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

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

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

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

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.

- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

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

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

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

For the purposes of this policy, the **"consensual and non-consensual sharing of nude and semi-nude images and/or videos"**, colloquially known as **"sexting"**, and collectively called **"youth-produced sexual imagery"** is defined as the creation of sexually explicit content by a person under the age of 18 that is shared with another person under the age of 18. This definition does not cover persons under the age of 18 sharing adult pornography or exchanging messages that do not contain sexual images.

"**Deep fakes**" and "**deep nudes**" refer to digitally manipulated and AI-generated nudes and

semi-nudes.

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

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

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

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

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

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

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

children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

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

For the purposes of this policy, **"sex"** is defined as biological sex. This means that, under the Equality Act 2010:

A 'woman' is a biological woman or girl (a person born female) and a 'man' is a biological man or boy (a person born male). The UK Supreme Court's ruling clarifies that the terms "woman" and "sex" in the Equality Act 2010 refer exclusively to biological sex at birth.

3. Legal framework

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

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- DfE (2025) 'Keeping children safe in education 2025'

- DfE (2023 'Working Together to Safeguard Children 2023'
- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2025) 'Academy trust handbook 2025'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2025) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2022) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- DfE (2024) 'Working together to improve school attendance'
- DfE (2025) Relationships Education, Relationships and Sex Education (RSE) and Health Education (for teaching until 31 August 2026)

Non-statutory guidance

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

Policies and documents

This policy operates in conjunction with the following school-level and trust-wide policies:

- BET Code of Conduct
- BET Data Protection Policy
- BET Data Retention Policy
- BET Disciplinary Policy
- BET Disciplinary Rules
- BET Ending Bullying and Harassment Policy
- BET ICT and Communications Policy
- BET Recruitment and Selection Policy
- BET Whistleblowing Policy
- BET Model Sexual Violence and Harassment Between Children in School Policy
- BET Model Suspension and Exclusion Policy
- BET Model Statement for Dealing with Allegations of Abuse Against Staff
- BET Model Supporting Children with Health Needs Who Cannot Attend School Policy

- Behaviour Policy
- Attendance Policy
- Anti-bullying Policy
- Online safety/e-safety Policy
- Management of allegations Policy
- Safe Use of AI Policy
- PSHE Policy
- Relationship and Sex Education and Health Education Policy

4. Roles and responsibilities

The board of trustees is responsible for:

- Carrying out their functions to safeguard and promote the welfare of children in all schools within the MAT.
- Understanding their safeguarding duties and having regard to any statutory guidance on safeguarding issued by the Secretary of State.
- Taking strategic leadership responsibility for the trust's safeguarding arrangements.
- Ensuring the suitability of staff, supply staff, volunteers, contractors, and proprietors.
- Making sure that all schools within the trust have effective safeguarding policies, procedures and training in place that comply with their statutory obligations.
- Ensuring that the policies and procedures adopted by local governing committees, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.
- Having procedures in place to monitor the implementation of safeguarding policies and procedures regularly.
- Ensuring that all governors and trustees receive appropriate safeguarding and child protection training at induction, and that this training is updated regularly thereafter.
- Commissioning annual safeguarding audits of each school.
- Receiving regular reports on safeguarding to the board of trustees delegating operational responsibilities.
- Ensuring that every school within the trust complies with its duties under the above child protection and safeguarding legislation.
- Facilitating training opportunities trust-wide to ensure consistency in the level of training and expertise in safeguarding across the trust's schools.
- Guaranteeing that each school within the trust contributes to multi-agency working in line with the statutory guidance '[Working Together to Safeguard Children]'.
- Confirming that the trust's safeguarding arrangements take into account the procedures and practices of the relevant LAs as part of the inter-agency safeguarding procedures.
- Understanding the local criteria for action and the local protocol for assessment for each school within the trust and ensuring these are reflected in the trust's policies and procedures.
- Complying with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.

- Ensuring that staff in schools working directly with children read at least part one of KCSIE.
- Ensuring that staff in schools who do not work directly with children read either part one or Annex A of KCSIE. **NB:** Individual schools within the trust will assess which guidance will be most effective for their staff to safeguard and promote the welfare of children.
- Ensuring that mechanisms are in place to assist staff in schools to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensuring schools within the trust appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Ensuring schools within the trust appoint one or more DDSLs to provide support to the DSL and ensuring that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Ensuring each school within the trust facilitates a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern within a school that is part of the trust, ensuring there are procedures in place to take the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensuring systems are in place within the trust for pupils to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensuring that procedures are in place within the trust so that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensuring that a member of the local governance committee for each school within the trust is nominated to liaise with the school's LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Ensuring all relevant persons are aware of the trust's safeguarding arrangements, including the board of trustees itself, and each school's DSL, DDSL(s) and SLT.
- Making sure that pupils in each school are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhering to statutory responsibilities by ensuring pre-employment checks are conducted on all staff within the trust who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensuring that staff within the trust are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensuring each school within the trust has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.

- Guaranteeing that volunteers within the trust are appropriately supervised.
- Making sure that at least one person on any appointment panel within the trust has undertaken safer recruitment training.
- Ensuring that all staff within the trust receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensuring each school within the trust takes overall strategic responsibility for filtering and monitoring and seek assurance that the filtering and monitoring standards for schools are being met
- Certifying that there are procedures in place within the trust to handle allegations against staff, supply staff, volunteers and contractors.
- Confirming that there are procedures in place within the trust to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guaranteeing that there are procedures in place within the trust to handle pupils' allegations against other pupils.
- Ensuring that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff within the trust.
- Ensuring that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child and teenage relationship abuse within the trust.
- Guaranteeing that there are systems in place for pupils to express their views and give feedback within the trust.
- Establishing an early help procedure and ensure all staff within the trust understand the procedure and their role in it.
- Appointing a designated teacher for LAC within each school to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensuring that the designated teacher for LAC within each school works with the virtual school head(s) (VSH) to discuss how the pupil premium funding can best be used to support LAC.
- Introducing mechanisms to assist staff within the trust in understanding and discharging their roles and responsibilities.
- Making sure that staff members within the trust have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Putting in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensuring the trust has put in place appropriate safeguarding responses for pupils who go missing from a school within the trust, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and preventing the risk of their disappearance in future.

- Ensuring that all members of the board of trustees have been subject to an enhanced DBS check.
- Creating a culture within the trust where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring that robust safeguarding records are kept in each school and the effectiveness of recordkeeping is monitored.
- Acting in accordance with their obligations under the Human Rights Act 1998 the Equality Act 2010, and the trust's local multi-agency safeguarding arrangements.
- Ensuring each school within the trust has appropriate arrangements are in place to keep children safe where school facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks.
- Ensuring each school within the trust has safeguarding requirements that are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.
- Ensuring each school within the trust has robust health and safety and emergency evacuation procedures.
- Ensuring all policies align with the legal definition of sex while continuing to support and protect transgender and non-binary children and staff.
- Ensuring that staff are trained to understand the implementation of the ruling on the definition of transgender and how to support transgender children within the legal framework
- Ensuring that all children and staff are aware they are expected to respect the rights of others
- Ensuring all staff and children including those who identify as transgender and non-binary feel full supported and safe.

The Trust Safeguarding Lead is responsible for:

- Liaising with the board of trustees on an agreed basis with regards to safeguarding matters.
- Undertaking any responsibilities delegated to them by the board of trustees.
- Liaising with the DSL in each school on an agreed basis regarding safeguarding matters.
- Taking leadership responsibility for safeguarding arrangements within the trust.

The Headteacher has a duty to:

- Ensure that the policies and procedures adopted by the trust, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff within the trust with the appropriate policies and information upon induction.
- Ensure that staff implement appropriate filters and monitoring of online material.

- Ensure that the school practises safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in Keeping Children Safe in Education and the Education (Independent School Standards) (England) Regulations 2014 as amended.
- Ensure that, where the school ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS within one month.

DSLs have a duty to:

- Take lead responsibility for safeguarding and child protection within their school, including online safety.
- Report on an agreed basis to the board of trustees via the agreed route of communication.
- Refer cases:
    - To CSCS where abuse and neglect are suspected, and support staff who make referrals CSCS.
    - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
    - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
    - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Ensure each member of staff within their school has access to and understands the Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the board of trustees or delegated authority to ensure their school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Understand the importance of information sharing within the trust, including within school, with the trust's other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Adhere to any other school-level duties outlined in their school's Child Protection and Safeguarding Policy and their job description.
- Adhere to any safeguarding arrangements specified in the trust's funding agreement.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

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

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

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

- Consider, at all times, what is in the best interests of the pupils in the trust.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide safe environments in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the trust's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and DDSL(s) within the relevant school.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL within the relevant school.
- Be aware of and understand the trust's procedure to follow in the event that a pupil confides they are being abused, exploited or neglected.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to their school's DSL or DDSL(s) if they are unsure about how to manage safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.

5. Multi-agency working

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

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

The school will develop trusting relationships between families and agencies to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

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

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

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

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

6. Information sharing

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

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

Staff members within the trust and its schools will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If school staff members are in doubt about sharing information, they will speak to their school's DSL or DDSL(s).

7. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Schools within the trust will be proactive in ensuring that every pupil is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with pupils to identify concerns as early as possible.

Any pupil may benefit from early help, but in particular, staff within the trust will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Are suffering from mental ill health.
- Are young carers.

- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised.
- Have family members in custody or is affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a PRU.

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

- Bereaved.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Have recently returned home to their family from care.
- Missing education, or are persistently absent from school, or not in receipt of full-time education.

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

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

The board of trustees or delegated authority will collaborate with the relevant LAs and external agencies to engage with the local early help process.

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

8. Abuse, neglect and exploitation

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

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

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

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

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

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

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

9. Specific safeguarding issues

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

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

10. Child-on-child abuse

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

The trust has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online.

All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring.

All staff will speak to their school's DSL if they have any concerns about child-on-child abuse.

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

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

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

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

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

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

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

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

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

11. Online safety and personal electronic devices

The trust will ensure that schools within the trust adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils within the trust's schools will be made aware of online risks and taught how to stay safe online.

Through training, all staff within the trust will be made aware of:

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

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

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

The trust will ensure that each of its schools have appropriate filtering systems in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the filtering and monitoring standards published by the DfE.

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

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

Communicating with parents

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

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

Reviewing online safety

All schools within the trust will conduct an annual review of its approach to online safety as part of their annual safeguarding review, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils will be closely monitored by the trust and its schools, in accordance with the Staff ICT and Electronic Devices Policy and Pupils' Personal Electronic Devices Policy.

The trust will ensure that schools are adhering to the Data Protection Policy and Photography and Images Policy and that the taking of any photographs and videos of pupils are carefully planned before any activity with particular regard to consent. The trust will ensure that procedures are in place for school DPOs to oversee the planning of any events where photographs and videos will be taken.

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

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

Upskirting

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

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

12. Consensual and non-consensual sharing of indecent images and videos

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

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

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

Where a member of staff within the trust becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the affected school's DSL as soon as possible. Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copying, printing, sharing, storing or saving the imagery.
- Inform the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved and reassuring them that they can receive support from the school's DSL.
- Report the incident to the school's DSL.

13. Context of safeguarding incidents

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

14. Pupils potentially at greater risk of harm

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

Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

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

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

Home-educated children

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

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

Where a parent has expressed their intention to remove a pupil from a school within the trust for EHE, the school, in collaboration with the trust, LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

LAC and PLAC

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

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

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

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

Further details of safeguarding procedures for LAC and PLAC are outlined in each school's LAC Policy.

Pupils with SEND

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

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability.
- Pupils with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs.
- Communication barriers may exist, as well as difficulties in overcoming these barriers.

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL in the affected school will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

LGBTQ+ pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff within the trust will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. All staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

Pupils requiring mental health support

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

15. Use of school premises for non-school activities

Where a school within the trust hires or rents out school facilities or school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe, including seeking approval from the board of trustees, where required. The trust will ensure that schools within the trust refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

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

Where activities are provided separately by another body, this may not be the case; therefore, the board of trustees or delegated authority will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed.

The board of trustees or delegated authority will also ensure that there are arrangements in place to liaise with schools within the trust on these matters where appropriate. The board of trustees or its delegated authority will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the schools in the trust to effectively safeguard pupils and adhere to local and trust-wide safeguarding arrangements.

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

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

16. Alternative provision

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs.

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

17. Work experience

The trust will ensure that schools have the appropriate procedures in place to ensure that providers of work experience have appropriate safeguarding policies and procedures in place. Where pupils are undertaking work experience at the trust or one of the schools within the trust, an enhanced DBS check will be obtained if the pupil is over the age of 16.

18. Homestay exchange visits

School-arranged homestays in UK

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

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

School-arranged homestays abroad

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

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

Privately arranged homestays

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

Private fostering

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

19. Concerns about pupils

The trust's Safeguarding Lead will monitor the procedures within each school for reporting concerns about pupils' welfare. Monitoring visits will be conducted at least annually and will assess whether each school:

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

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

The trust and its schools will ensure that all staff members, including those working within the trust's schools, are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the Communication and confidentiality section of this policy.

The trust adopts a zero-tolerance approach to child-on-child abuse, which is defined as abuse between children under the age of 18. The procedures for managing instances of child-on-child abuse will be held within each school and will also reference the Behaviour Policy.

The school will consider whether a family group decision-making forum is appropriate to determine the help and support the family network can provide for a pupil where concerns have been raised about their safety or wellbeing.

20. Managing referrals

The reporting and referral process outlined in the Reporting Safeguarding Concerns Flowchart will be followed accordingly.

All staff members, in particular the DSLs and DDSLs working in schools within the trust, will be aware of the LA's arrangements in place for managing referrals. The school DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

DSLs will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. DSLs will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

Schools within the trust will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, schools will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. Schools will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

21. Concerns about trust safeguarding practices

Any concerns regarding the safeguarding practices at the school will be raised with the SLT of the school, and the necessary whistleblowing procedures will be followed, as outlined in the trust's Whistleblowing Policy. If a staff member feels unable to raise an issue with their school's SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

22. Safeguarding concerns and allegations of abuse against staff

All allegations against school staff, trust staff, supply staff, volunteers and contractors will be managed in line with the relevant Allegations of Abuse Against Staff Policy and the procedures laid out by the individual school at which the staff members work or have worked. The trust will ensure its schools are equipped to manage all allegations against staff, including those who are not employees of schools within the trust, and that the affected schools liaise with the relevant parties.

When managing allegations against staff, the trust will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns."

Allegations that meet the harms threshold include instances where staff have:

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

Low-level concerns will be managed in line with the affected school's Reporting Low-level Safeguarding Concerns Policy (in place from Autumn 2025).

23. Communication and confidentiality

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

- Understand the importance of information sharing, both within their school and the trust, and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances

where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with the data protection policies of the trust and individual schools within the trust.

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

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

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

Depending on the nature of a concern, the DSL of the affected school will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. External agencies will be invited to these discussions where necessary.

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

24. Safer recruitment

The trust's full policy and procedures for safer recruitment are outlined in the BET Recruitment and Selection Policy.

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

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

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

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

The appropriate DBS and suitability checks will be conducted for all trustees and local governors, volunteers, and contractors within the trust.

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

Referral to the DBS

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

25. Single central record (SCR)

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

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

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check, where required
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- **[Colleges only]** Whether the employee's position involves relevant activity, i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18
- A section 128 check for those in management positions

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

The SCR will also record:

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

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

26. Training

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

The induction training will cover:

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

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

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

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

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

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conference, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.

- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND

27. Monitoring and review

This policy is reviewed at least annually by the trust. This policy will be updated as needed to ensure it is up to date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is Autumn 2026.

The trust will ensure that any significant child protection incidents at any of its schools will be followed up by a review of safeguarding procedures within that school by the trust safeguarding lead. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the school's procedures.

If any concerns are raised by the LADO or Ofsted about safeguarding issues, the following actions will be taken:

- The trust safeguarding lead conducts an investigation as a priority and comply with any deadlines given
- The Chair of the Governors reports to the LADO or Ofsted on the findings of the investigation and sets out any action to be taken
- The school endeavours to comply as soon as possible with any recommendations from the LADO or Ofsted

Appendix A

Specific safeguarding issues

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

Here are the issues covered:

1. Domestic abuse
2. Homelessness
3. Children absent from education
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)

6. Cyber-crime
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM
10. Virginity testing and hymenoplasty
11. Forced marriage
12. Radicalisation
13. Pupils with family members in prison
14. Pupils required to give evidence in court
15. Mental health
16. Serious violence
17. Gender Identity

Domestic abuse

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

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

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

Homelessness

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

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

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

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

Children absent from education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The trust will ensure that its schools respond to children persistently being absent from education and will support schools in identifying such abuse and help prevent the risk of pupils becoming absent from education in the future.

Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing from Education Policy.

Schools within the trust will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

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

Admissions register

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

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

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

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

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

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

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

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

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

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

If a pupil is to be removed from the admissions register, the relevant school will provide the LA with the following information:

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

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

Child abduction and community safety incidents

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

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

Schools within the trust will provide pupils with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child criminal exploitation (CCE)

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

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

Specific forms of CCE can include:

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

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

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

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

County lines

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

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

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.

- Being exposed to techniques such as 'plugging,' where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

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

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

Cyber-crime

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

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

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

Child sexual exploitation (CSE)

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

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

School staff will be able to recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. Schools will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. Staff will also

recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

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

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

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

Modern slavery

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

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

The trust will publish an annual statement **on its website** setting out the steps it takes to prevent modern slavery within the trust and its schools.

FGM

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

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

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of

18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been conducted. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

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

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

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

Indicators that FGM may take place soon include:

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

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

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

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

Virginity testing and hymenoplasty

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

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

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

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

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

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

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

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a prolonged period which was not a problem previously

- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or notable change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

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

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

Forced marriage

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

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

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

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

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

- Being absent from school – particularly where this is persistent.

- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

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

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

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

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

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

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

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.

- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

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

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

Schools will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

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

Radicalisation

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

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

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

Protecting pupils from the risk of radicalisation is part of the trust's wider safeguarding duties. Schools within the trust will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Schools will ensure that procedures are in place for staff to be alerted to changes in pupils' behaviour which could indicate that they may need help or protection. Schools will also ensure that staff can use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The trust and its schools will work together with local safeguarding arrangements as appropriate.

The trust will ensure that schools engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the trust and its schools will assist and advise family members who raise concerns and provide information for support mechanisms.

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

The Prevent duty

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

Pupils with family members in prison

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

Pupils required to give evidence in court

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

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

Mental health

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

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

Staff within the trust and its schools who have a mental health concern about a pupil that is also a safeguarding concern are encouraged by the trust to act in line with this policy and their school-level Child Protection and Safeguarding Policy and speak to the DSL or DDSL(s).

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

Serious violence

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

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

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

- Being male.
- Having been frequently absent from school.
- Having been permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

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

Gender Identity

The UK Supreme Court's ruling clarifies that the terms "woman" and "sex" in the Equality Act 2010 refer exclusively to biological sex at birth. Schools must align their policies with this interpretation, ensuring that legal duties regarding sex are framed around biological sex.

However, schools are expected to foster an inclusive environment while adhering to the legal framework and ensure practical measures include addressing name changes, pronoun usage, and the provision of single-sex spaces.

Schools should balance safeguarding, data rights, and equality duties for all children, considering the complex legal issues involved.

Schools should provide support for transgender and gender-questioning children through inclusive policies and practices and this includes staff training to raise awareness and competence in supporting transgender students and tackling harmful stereotypes and safeguarding concerns.

Schools should ensure all members of the school community who identify as transgender and non-binary feel supported and recognise they are still protected under the Equality Act, with the protected characteristic of gender reassignment.

Appendix B

School and Trust Contact Details

Role	Name	Email
DSL	Georgia Geary	GearyG@wps.org.uk
DDSL	Sam McCormack	mccormacks@wps.org.uk
DDSL	Sarah Snell	snells@wps.org.uk
DDSL	Claire Rogers	rogersc@wps.org.uk
Online Safety Lead	Samie French	frenchs@wps.org.uk
Safeguarding Governor	Josef Czerpak	czerpak@wps.org.uk
Trust Safeguarding Lead	Clare Goldsmith	GoldsmithC@bourne.education

Published date:	Autumn 2025
Author:	The National College (modified)
Approved by:	
This policy is written with reference to:	Keeping Children Safe in Education 2025
Next review:	Autumn 2026